PGO 2·0

Justice First:
Human-Led, AI-Empowered



REPORT ON EXECUTION · DAY 0 TO DAY 100

The First Hundred Days

From governance on paper
to governance in practice.

An account of how the Prosecutor General's Office (PGO) delivered the first hundred days of PGO 2.0, tested gate by gate against its own plan.

PGO-RPT-AI-001 · VERSION 1.0 · NOVEMBER 2026

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AN INITIATIVE UNDER Maldives 2.0

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ABOUT THIS REPORT

An account of the first hundred days

On 11 August 2026 PGO brought its AI strategy, framework and policy into force. A hundred-day plan then set ten statements that had to be true on 19 November 2026. This report takes each of them in turn.

It is written for the people and institutions with an interest in how a prosecution service adopts artificial intelligence responsibly: courts and investigating authorities, development partners, peer prosecution services, and the public PGO serves.

The plan made a commitment that this report keeps: *any statement that is not true on Day 100 is reported as not true, with a date by which it will be.* What was met and what remains are therefore set out with equal prominence and on the same evidence standard.

REPORTING PERIOD

Day 0, Tuesday 11 August 2026, when the three core governance instruments came into force, to Day 100, Thursday 19 November 2026.

BASIS OF PREPARATION

Each verdict rests on PGO's own records: signed Committee minutes, instrument version histories, training and certification records, and procurement status. Where a record does not yet exist, the item is not counted as done.

SCOPE

The ten Day 100 gate statements in Section 13 of the Hundred-Day Implementation Plan. Wider programme work, including the sovereign AI contract and infrastructure procurement, is referred to only where a gate depends on it.

HOW VERDICTS ARE GIVEN

Met	The statement is true on Day 100, as written.
Largely met	The substance is in place; a defined element remains, with a date.
In progress	Work is under way; material parts are not yet in place.
Not yet met	Carried forward with an owner and a target date.

The fill of each symbol reflects the verdict, so the scale reads without colour.

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PGO 2.0 is an initiative under Maldives 2.0.



Justice (Rtd.) Abbas Shareef

Prosecutor General
Republic of Maldives

> “AI will assist prosecutors. The prosecutors will make the decisions.”

Portrait stylised using AI.

FOREWORD

Governance before deployment, kept as a promise

When PGO began PGO 2.0 on 11 August 2026, we made a commitment: artificial intelligence would enter prosecution under our own rules, in our own language, and on systems we control.

This report is the first account of how we have kept that commitment. In a hundred days, almost all our staff have been trained, our AI Governance Committee has met three times, and an early first version of the Prosecutor Assistant has been launched in Dhivehi for testing.

We set ourselves a hard test. Ten statements had to be true on Day 100, each shown by a record. Five are true in full and three in substance. The two still in progress depend on suppliers, and each has a date. I would rather report that result against a demanding standard than full marks against an easy one.

Our principle has not changed, and it will not. Technology will take groundwork off a prosecutor’s desk. It will not take a decision out of a prosecutor’s hands. Every charging decision at PGO will remain the responsibility of a qualified prosecutor, who answers for it.

This work has not been ours alone. I am grateful to His Excellency the President and the Digital Transformation Council for their guidance and steady support throughout, and for the funding that made this programme possible. I thank the leadership of MINDCo, the Maldives Innovation and Digital Company, for their support in bringing AI training to every part of PGO.

I also thank the members of the Committee, PGO’s IT team, the experts and advisers who have lent their knowledge to the programme, and every member of staff who gave their time to learning something new. The next hundred days will be judged by the same standard as the first.

Justice (Rtd.) Abbas Shareef
Prosecutor General



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OVERVIEW

Eight of ten gates met or largely met; the two still in progress depend on suppliers

PGO set itself a demanding hundred-day test and has largely passed it. A hundred days after its AI governance instruments came into force, PGO has a working governance system, a trained workforce, an early Dhivehi version of its first sovereign AI capability in testing, and AI use recorded automatically in its case system. Every gate within PGO's own control is met or largely met. The two still in progress, devices and off-site backup, depend on outside suppliers, and Chapter 06 sets a date for each.

The hundred-day plan set out to prove four things: that governance works instrument by instrument and not only on paper; that every member of staff understands, at an assessed level, what AI is and what the rules are; that one capability can be taken into use without breaching those rules; and that the conditions for everything else, devices and a recoverable backup, are being built at the same time.

The first two were largely met. The Designated AI Lead was appointed and the AI Governance Committee constituted. The Committee met three times, each meeting recorded in signed minutes. Five of the seven scheduled governance documents, including the Everyday Use Guide, the AI Tool Register and the incident reporting guide and form, have been endorsed by the Committee and the Prosecutor General and are in force, with Microsoft Copilot as the first registered tool, approved for all staff with a firm bar on case-related data. The incident process was proven on Day 98 with a scripted near-miss taken through the log end to end. A Direction requiring investigating authorities to disclose AI use in material submitted to PGO, not foreseen in the plan, was endorsed and issued on Day 85.

186 of 193 staff, 96%, completed the assessed and certified *AI Essentials: Understanding and Working with AI* course. Beyond the gate, 171 staff, 89%, have completed the UNESCO and Saïd Business School (University of Oxford) course *AI, Justice and the Rule of Law*, and all three staff planned for specialist certification in the period have earned EC-Council AI certifications.

The third was largely met. An early beta of the Prosecutor Assistant, a chat interface over more than 80 legal documents in Dhivehi, went to the Committee for testing on Day 96; its fuller features are still to come. The AI activity log is live in Mafini and records AI use automatically, with no data entry by staff; its operation has been demonstrated.

The fourth is in progress. Device delivery has slipped by around three weeks, owing to global shipping delays and high demand for AI-capable hardware. No off-site backup service has been contracted: proposals have been received from service providers and evaluation is under way.

FIVE GATES MET

- AI Lead appointed; Committee constituted
- Three Committee meetings, with signed minutes
- AI Tool Register live, Copilot registered
- AI activity log live, logging automatically
- Incident log exercised end to end

THREE LARGELY MET

- Five of seven instruments in force
- 96% of staff trained and certified
- Prosecutor Assistant early beta in testing

TWO GATES IN PROGRESS

- Devices delayed by around three weeks
- Off-site backup not yet contracted

What made the difference

Three things carried the governance and training results. First, PGO kept to its own rule that nothing goes live ahead of its governing instrument: Copilot reached staff only after its register entry was endorsed, and the Prosecutor Assistant has gone to the Committee for testing before any wider testing. Second, the Committee worked to a fixed rhythm of short, single-purpose meetings, with drafts circulated in advance and minutes finalised and signed promptly. Third, training was drawn from established national and international providers rather than built from nothing, which allowed almost every member of staff to be reached inside the period.

What took longer than planned

The plan assumed the governance structure would stand up in the first fortnight. In practice the Committee first met on Day 65, which pushed every instrument endorsement into the second half of the period and left the Prosecutor General's approvals queued close to Day 100. The two gates still open on infrastructure share a second cause: each depends on an outside supplier or a hardware supply chain, and the plan did not hold enough margin for that dependence.

What this report does not claim

An off-site backup is not a disaster recovery site, and this report does not describe it as one. Internal training records competence under the AI Governance Policy; it is not external certification, and the two are kept apart throughout.

What happens next

The road ahead (Chapter 06) gives each open gate an owner and a target date. In brief:

- the two remaining instruments are reviewed by the Committee and taken to endorsement;
- the Prosecutor Assistant beta moves from Committee testing to further testing by a selected group of prosecutors;
- devices are issued against signed acceptance records;
- the off-site backup is contracted, and a restore is tested and signed off.



An AI Essentials session, delivered under the Digital for All national literacy campaign.

WHY THE BAR WAS SET HIGH

Ambitious by design

The plan could have set ten easy gates. It set ten hard ones.

Each gate had to be shown by a record, and every part had to be true for it to count. An instrument counted as operational only once it had an owner, an activation session, live use, a full cycle and written confirmation.

All of this began from a standing start. On Day 0, PGO had its three core instruments and no AI Lead, Committee, register or incident process. A plan met in full on easy terms would have told PGO little. This one shows exactly where the pathway holds and where it needs more time.

What the hundred days proved

The plan set out to prove four things. Three are proved; the fourth is under way.

01 **Governance works instrument by instrument** — PROVED

Five instruments are in force, the incident process has been run end to end, and the Register has already set firm limits on the first tool.

02 **Staff understand AI and the rules** — PROVED

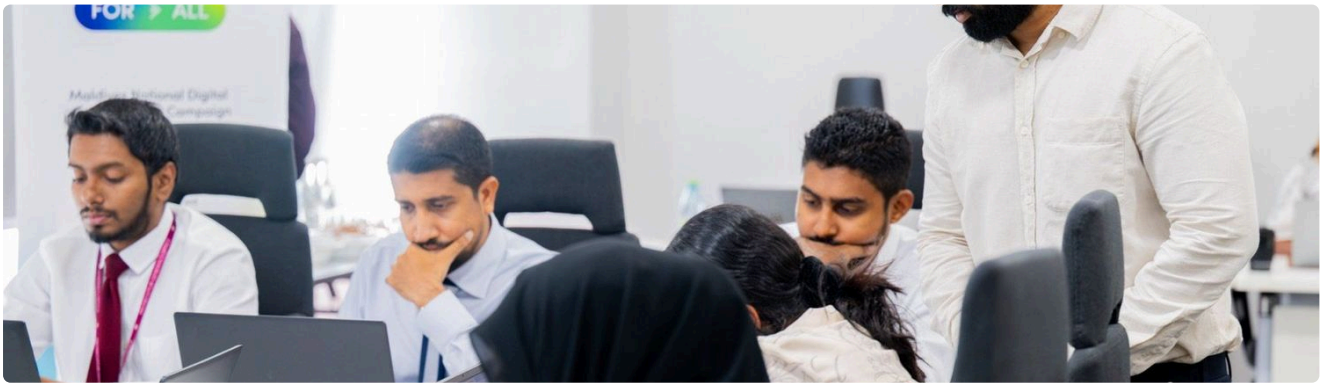
Almost every member of staff, 96%, has been trained and certified.

03 **A capability can be taken towards use within the rules** — PROVED

The Prosecutor Assistant reached the Committee for testing, in Dhivehi, without touching live case data.

04 **The infrastructure is built at the same time** — UNDER WAY

Devices and off-site backup are under way, and both depend on suppliers.



An AI Essentials session, delivered under the Digital for All national literacy campaign.

WHY THE BAR WAS SET HIGH

Why governance came first

At Day 0, staff intention to adopt AI scored 81 out of 100 in PGO's readiness baseline, while the responsible-AI guidance available to them scored 52.

Putting tools in people's hands before the rules exist is how fabricated citations and undisclosed AI output reach courtrooms. In prosecution, an error of that kind cannot be recalled once a case is filed.

PGO chose to close the guidance gap first. That cost time, and this report shows it: visible AI capability is still at an early stage. It also means nothing deployed so far has to be undone.

The sequence is consistent with the UNESCO Recommendation on the Ethics of Artificial Intelligence and the UNESCO Guidelines for the Use of AI Systems in Courts and Tribunals.

2026 AI READINESS BASELINE

Scores out of 100

Intention to adopt AI · 81



Responsible-AI guidance available · 52



The gap between the two is the gap the governance instruments were written to close. Source: PGO 2.0 Vision and Programme Summary, August 2026.

SHARED WITH OTHERS

Under the Pledge for Justice, PGO's framework and training curriculum will be shared with other jurisdictions at no cost.



A facilitator supports a participant during an AI Essentials session.

THE HUNDRED DAYS IN NUMBERS

Day 100, measured

The Day 100 gate

8/10

gates met or largely met, 80% of the Day 100 gate

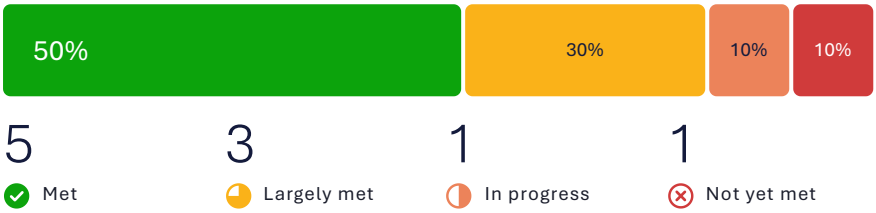
8/8

gates within PGO's own control met or largely met

2

gates in progress, devices and off-site backup, both dependent on outside suppliers

Ten statements were to be true on 19 November 2026. Full count by verdict:



> Any statement that is not true on Day 100 is reported as not true, with a date by which it will be.
>
> Hundred-Day Implementation Plan, Section 13

People and governance

186/193

staff, 96%, completed the assessed and certified AI Essentials course

171/193

staff, 89%, certified in UNESCO–Oxford *AI, Justice and the Rule of Law*

3/3

specialist staff planned for the period awarded EC-Council AI certifications

3/3

AI Governance Committee meetings held, each with signed minutes

5/7

governance documents endorsed by the Committee and the Prosecutor General

5+1

in force: five governance instruments and one Direction to investigating authorities, brought into force during the period. The three core instruments have been in force since Day 0.

Staff figures exclude auxiliary staff. The verdict for each gate is shown in the contents and in Chapter 03.



Staff at an AI Essentials session.

DAY 0 TO DAY 100

From a standing start

What PGO had on 11 August 2026, and what it has on 19 November 2026.

	DAY 0 · 11 AUG		DAY 100 · 19 NOV
AI Lead	None	→	Appointed on Day 9
AI Governance Committee	None	→	Nine members; three meetings, each with signed minutes
Governance instruments in force	Three core instruments	→	Eight, plus a Direction to investigating authorities
AI Tool Register	None	→	Live, with Microsoft Copilot registered
Incident process	None	→	Tested end to end on Day 98
Staff certified in AI Essentials	None	→	186 of 193, 96%



Staff at an AI Essentials session.

TIMELINE

One hundred days, in order

0 DAY

TUE 11 AUG 2026

Governance in force

The Institutional AI Strategy 2026–2028, the AI Governance Framework and the AI Governance Policy come into force. Day 0.

7 DAY

TUE 18 AUG

Hundred-day plan prepared

An implementation plan sets ten Day 100 gate statements across seven workstreams.

9 DAY

THU 20 AUG

AI Lead and Committee

The Designated AI Lead is appointed and the AI Governance Committee established.

15 DAY

WED 26 AUG

Sovereign AI programme contracted

PGO signs its strategic AI licensing, sovereign deployment and consultancy agreement with Thaana AI.

43 DAY

WED 23 SEP

Sandbox request to China

Under the new cooperation agreement with the Supreme People's Procuratorate, PGO requests support for a Technical Sovereign Sandbox to test AI tools away from live case data.

60–80 DAY

10–30 OCT

Seminar in China

Two officials attend a three-week seminar on digital transformation and AI in the public service, Wuhan Textile University.

65 DAY

THU 15 OCT

Committee: first meeting

Everyday Use Guide and AI Tool Register endorsed. Microsoft Copilot approved for all staff as an enterprise tool, with no case-related data.

71 DAY

21–23 OCT

First specialists certified

Batch 1 of the EC-Council programme: three staff earn C|AIPM and C|OASP certifications through Koenig Solutions.

80 DAY

FRI 30 OCT

Staff trained

186 of 193 staff, 96%, have completed AI Essentials and been certified.

82 DAY

SUN 1 NOV

Committee: second meeting

Incident reporting guide, AI Incident Report Form and AI Use Record endorsed. PGO 2.0 logo adopted for published AI-generated content.

84 DAY

TUE 3 NOV

Committee: third meeting

Convened at short notice at the Prosecutor General's request. Direction on Disclosure of AI Use endorsed as amended.

85 DAY

WED 4 NOV

Direction issued

The Prosecutor General issues PGO-DIR-AI-001 to investigating authorities, from the Maldives Police Service to the Presidential Commissions.

96 DAY

SUN 15 NOV

Prosecutor Assistant beta launched

An early beta, a chat interface over more than 80 legal documents in Dhivehi, is shared with the AI Governance Committee for testing.

98 DAY

TUE 17 NOV

Incident log exercised

With the incident instruments endorsed by the Prosecutor General, a scripted near-miss is raised, logged, assessed, closed and escalated to the Committee.

100 DAY

THU 19 NOV 2026

Day 100

171 staff certified in the UNESCO–Oxford course on AI, justice and the rule of law.



CHAPTER 01

PGO 2.0 at a Glance

Artificial intelligence is entering prosecution. PGO is adopting it under its own rules: governance before deployment, Dhivehi from the start, and every charging decision in the hands of a qualified prosecutor.

24

month programme, 2026 to 2028, on infrastructure PGO controls

8

governed capabilities to be built into Mafini, PGO's case management system

6

commitments that every capability, control and decision must meet

WHAT PGO 2.0 IS

PGO's own AI strategy and delivery programme

PGO 2.0 completes Mafini, PGO's case management system, and builds eight governed capabilities into it, developing the two together rather than one after the other. It runs for 24 months, on infrastructure PGO controls, under PGO's own AI Governance Framework.

The programme rests on three pillars, each delivered through two enablers: **Capability and Delivery** (the digital core; evidence, identity and case integrity), **People and Access** (prosecutor empowerment; citizen-centred access), and **Governance, Data and Trust** (governance before deployment; sovereign and secure data).

GOVERNANCE BEFORE DEPLOYMENT

No AI tool operates on a live PGO matter until the applicable instruments are in force, the tool is entered in the AI Tool Register, and its users are assessed as competent. The hundred days put that rule into operation.

EIGHT CAPABILITIES, BUILT INTO MAFINI

01 Legal analysis	02 Identity checks	03 Prosecutor Assistant	04 Summarisation and charge drafting
05 Tamper-evident evidence	06 Document exchange ledger	07 Case intelligence	08 Citizen guidance

SIX COMMITMENTS

i — Ethics and human rights
Human rights, fairness and due process come first.

ii — Human authority
Every charging decision belongs to a qualified prosecutor.

iii — Fairness
Tools are checked for bias and error before and during use.

iv — Sovereignty
Case information and the AI that works on it stay under Maldivian control.

v — Transparency
Material AI use in court-facing work is recorded and disclosed.

vi — Inclusivity
Where a person lives should not decide the service they get.

WHAT PGO 2.0 WILL NEVER AUTOMATE

- No automated charging, prosecution or discontinuation decisions.
- No use of public AI tools with PGO case information.
- No AI-fabricated evidence, witness accounts, authorities or court material.
- No assessment of guilt or truthfulness from face, voice or demeanour.

THE READINESS BASELINE



Adoption intention · Responsible-AI guidance · Readiness Index

2026 AI Readiness Baseline, scores out of 100. Closing the 29-point gap is a headline target. Source: PGO 2.0 Vision and Programme Summary, August 2026.

PGO 2.0 AT A GLANCE · THE LAUNCH

PGO 2.0, launched in public

PGO 2.0 was unveiled to the public in the presence of the nation's leadership. At the request of the Prosecutor General, His Excellency President Dr Mohamed Muizzu officially launched the initiative during a ceremony attended by the Chief Justice, the Attorney General, members of the diplomatic corps, senior government officials, PGO staff, and other distinguished guests.

More on the programme: pgoffice.gov.mv/en/pgo-2.0

> "Our position is simple. Technology assists; people decide. No decision to prosecute will be made by a machine, and no AI will alter evidence."
>
> The Prosecutor General, on the rules governing AI in Maldivian prosecution, following the World AI Regulation Summit 2026 in London



The Prosecutor General, His Excellency President Dr Mohamed Muizzu and the Chief Justice, Honourable Abdul Ghanee Mohamed, at the launch of PGO 2.0.

PGO 2.0 AT A GLANCE · THE LAUNCH

A programme for the whole of PGO

The launch presented the programme's commitments and its governance to the people who will work with it. Prosecutors and support staff from across PGO attended alongside senior leadership.



Deputy Prosecutor General Aishath Mohamed presenting in the programme.



Assistant Prosecutor General Mariyam Fezleen at the event.







PGO 2.0 AT A GLANCE · INTERNATIONAL COMMITMENT

Pledge for Justice

At the 15th United Nations Congress on Crime Prevention and Criminal Justice in Abu Dhabi in 2026, the Prosecutor General pledged, on behalf of the Republic of Maldives, that the prosecution service would adopt AI only under a binding governance framework put in place before any operational use.

The pledge is delivered through PGO 2.0, itself an initiative under Maldives 2.0, the national digital vision. It is funded entirely from the national budget. Government support is political and financial; prosecution decisions remain with PGO. Data stays on sovereign infrastructure, prosecutors must be assessed as competent before using a tool on a live case, and every tool is held on a register.

40%

target cut in routine case preparation time by the end of year two

24

month delivery programme; progress reported to the UN Commission on Crime Prevention and Criminal Justice from 2026 to 2031

THREE SAFEGUARDS AT THE HEART OF THE PLEDGE

01

No automated liberty decisions

No decision to charge, to discontinue a charge, or otherwise to determine a person's liberty will be automated.

02

Disclosure to the courts

Any use of AI in material placed before the courts will be disclosed.

03

Shared freely

The framework and the training curriculum will be shared at no cost with other jurisdictions.

WHAT PGO HAS COMMITTED TO

01 Adopt and enforce the AI governance framework across PGO by the end of 2028.

02 Cut routine case preparation time by at least 40% by the end of year two.

03 Build Dhivehi OCR and transcription, validated before use.

04 Replace the paper signature register with an append-only ledger.

05 Publish an annual external review from year two, including what did not work.

06 Share the framework and curriculum with other jurisdictions.

WORKING WITH OTHERS

UNODC, with which PGO has offered to share its work; UNESCO, whose standards provide the normative basis; and the CCPCJ, to which progress is reported. An independent technical advisory panel, including an external AI governance specialist and a practitioner from a comparable jurisdiction, supports delivery.

The hundred days reported here are the opening months of that commitment: governance in force, staff trained, and an early version of the first capability in testing.

DELIVERY TIMELINE

Months 1–6
Framework adopted, risk classification, staff training, two pilots outside live cases

Months 7–12
Supervised Prosecutor Assistant, summarisation and charge drafting under review, Dhivehi transcription

Months 13–18
Decision support on live matters, disaster recovery tested, all staff assessed, first external audit

Months 19–24
Full deployment, capability transfer, handover to PGO's IT function

To end 2028
Framework applied to all matters, annual reviews published, materials shared

Source and full pledge: pgoffice.gov.mv/en/p4j

PGO 2.0 AT A GLANCE · CONTRACTS AT DAY 100

The three contracts behind PGO 2.0

PGO 2.0 is delivered through three contracts: the Sovereign AI Programme, the AI hardware it runs on, and devices for prosecutors. Because the sovereign platform runs on PGO's own servers, most of the build follows the arrival of the hardware and falls after Day 100.

CONTRACT 1

Sovereign AI Programme

With Thaana AI. Licensing of AI models, deployment on PGO infrastructure, and consultancy.

01	**Contract signed** 26 August 2026, Day 15. Strategic AI Model Licensing, Sovereign Deployment and Consultancy Services.	DONE
02	**Mobilisation** PGO's acceptance, technical, security and business owners nominated; a PGO project manager appointed; vendor personnel approved; security and confidentiality arrangements in place; performance guarantee lodged.	DONE
03	**Licensing** Three service agreements signed on 20 September: the control plane, the AI models and AI Legal.	DONE
04	**Infrastructure design** A detailed design of the sovereign infrastructure, 165 pages, delivered on 24 September for PGO's review.	UNDER WAY
05	**Discovery** Workshops held with every section of PGO by mid-October. The discovery report and roadmap are due on 25 November.	UNDER WAY
06	**Build and deployment** Installation and configuration on PGO's own servers, once the AI hardware is in place.	NEXT

CONTRACT 2

AI hardware and data centre

Supply and installation of the AI servers and data centre infrastructure that the sovereign platform runs on.

AWARDED · DUE DEC 2026

CONTRACT 3

2-in-1 laptops for prosecutors

The "Paperless Prosecution" devices. Delivery has slipped on global shipping delays and is now expected on 26 November 2026 (see Gate 09).

AWARDED

DELIVERY DUE 26 NOV

WHY MOST OF THE BUILD SITS AFTER DAY 100

Under PGO's own rules, case data and the AI that works on it stay on PGO-controlled infrastructure. The models are therefore installed only once the hardware is in place. The hundred days were used for the work that can safely come first: contracting, licensing, design, and discovery with every section of PGO.



CHAPTER 02

The Plan and How It Was Measured

How the hundred days were planned, and how each Day 100 gate was tested against PGO's own records.

CHAPTER 02

A deliberately narrow plan

The plan was deliberately narrow. It did not try to advance all eight capabilities, and it did not depend on the full technology partnership being in place. Most of it could be delivered by PGO's own people.

What the plan set out to prove

01 That the governance system works in practice, instrument by instrument, and not only on paper.

02 That every member of staff understands, at a basic and assessed level, what AI is, what it does badly, and what the rules are. Training is the deployment gate.

03 That PGO can take one capability from register entry to supervised daily use without breaching its own rules.

04 That the conditions for everything else are being built at the same time: prosecutors equipped with devices, and case records backed up off-site and demonstrably recoverable.

THE ONE HARD RULE

Nothing in the plan displaces the governance sequence. Where a go-live date arrives and the governing instrument, training or register entry is not complete, **the go-live moves**. It does not proceed with a note on file.

Where a tool waited for its governing instrument, as Copilot did for its register entry, this rule is what held it back.

SEVEN WORKSTREAMS

01	Governance made operational	Instruments issued, activated and tested, one by one.	GATES 1–3, 5–6
02	AI literacy for all staff	Every member of staff trained and assessed.	GATE 4
03	Specialist capability	Four external certification tracks for key roles.	BEYOND THE GATE
04	One Mafini function live	The AI activity log: the system logs itself.	GATE 8
05	One AI capability live	The Prosecutor Assistant, in Category 2 scope.	GATE 7
06	Devices for prosecutors	Around 120 devices, issued against signed acceptance.	GATE 9
07	Secure off-site backup	Encrypted, immutable, with a tested restore.	GATE 10

FOUR BLOCKS ACROSS THE HUNDRED DAYS

Stand up	Train and assess	Build and pilot	Prove and report
Days 1–25 · 12 Aug – 5 Sep	Days 26–55 · 6 Sep – 5 Oct	Days 56–80 · 6 Oct – 30 Oct	Days 81–100 · 31 Oct – 19 Nov

Day 0 and Day 100

Day 0 is Tuesday 11 August 2026, when the three core governance instruments came into force. Day 100 is Thursday 19 November 2026. Both dates have been used consistently by PGO and the Committee throughout the period.

What "operational" means

The plan set a demanding standard for Gate 3. An instrument is operational only when five tests are met:

1. A named owner is recorded.
2. An activation session has been delivered and attendance logged.
3. The associated record or form is in live use.
4. One full cycle has run end to end, using a deliberate test case where no real one has arisen.
5. The AI Lead has confirmed all four in writing to the Committee.

An incident form counts as operational only once a test incident has been raised, logged, assessed, closed and escalated.

How each gate was assessed

Every gate statement was tested against PGO's records as they stood on Day 100. Where the statement has several parts, each part is checked; a gate is rated met only if all parts are true. Plan milestones are shown alongside each verdict so that lateness is visible even where the end result was met.

What changed along the way

- **The technology partner was contracted on Day 15**, far earlier than the plan's assumed award on Day 90, and the plan's procurement track was superseded.
- **The device specification changed** from tablets with styluses to 2-in-1 laptops, procured under the "Paperless Prosecution" contract.
- **A Direction was added.** The Committee's work produced a Direction to investigating authorities on disclosing AI use, issued on Day 85.



Prosecutors working together during AI training delivered by MINDCo.





CHAPTER 03

Gate by Gate

Ten statements had to be true on 19 November 2026, each shown by a record. This chapter takes them one at a time: what was delivered, what remains, and why.

01 AI Lead appointed — Met	02 Committee has met three times — Met	03 Instruments issued and activated — Largely met	04 All staff trained and assessed — Largely met	05 Tool Register live — Met
06 Incident log exercised — Met	07 Prosecutor Assistant in supervised use — Largely met	08 AI activity log live — Met	09 Staff equipped with devices — In progress	10 Off-site backup restore tested — Not yet met

GATE 01 OF 10

The AI Lead is appointed and the appointment record is complete.

VERDICT

MET

PLAN MILESTONE

Day 15 · 26 Aug

WHAT WAS DELIVERED

On 20 August 2026, Day 9, the Prosecutor General appointed the Designated AI Lead, the single accountable owner named in every instrument. The AI Lead chairs the AI Governance Committee, acts as PGO's focal point for the sovereign AI programme, and is the issuing authority or owner for most of the governance set.

The AI Governance Committee was established the same day around the AI Lead, with nine members spanning prosecution leadership, data governance, IT security and procurement:

- Designated AI Lead (Chair)
- Deputy Prosecutor General
- AI Data Governance Lead
- AI Procurement Lead
- Deputy Prosecutor General, AI Governance Lead
- Assistant Prosecutor General
- AI IT Security Officer
- Two further members

The Committee's composition goes beyond the plan, which asked for one senior prosecutor: two Deputy Prosecutors General and an Assistant Prosecutor General sit on it.

9

Committee members, including two Deputy Prosecutors General and an Assistant Prosecutor General

THE COMMITTEE

Members, roles and portraits are on the next page.

GATE 01 · GOVERNANCE IN PRACTICE

The AI Governance Committee

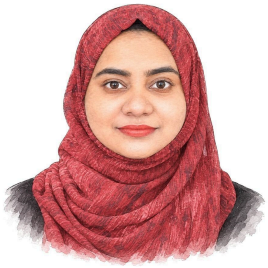
Nine members, chaired by the Designated AI Lead, bring together PGO's senior prosecutorial leadership with the specialists responsible for data, security and procurement.



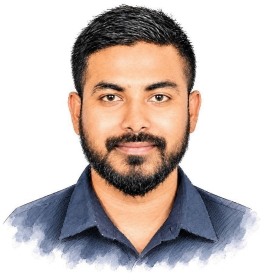
Ahmed Adam
Designated AI Lead
CHAIR



Mahmood Saleem
Deputy Prosecutor General; AI Governance Lead



Aishath Mohamed
Deputy Prosecutor General



Hussain Samy
Assistant Prosecutor General



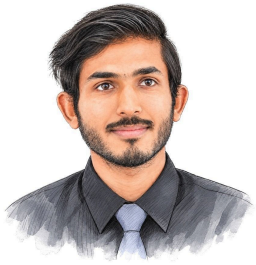
Aminath Waheeda
AI Procurement Lead



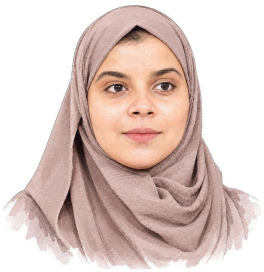
Ali Farsam
AI Data Governance Lead



Ali Nihadh
AI IT Security Officer



Ahmed Shafeeu
Committee Member



Sulthona Adam
Committee Member

WHAT IT DOES

Reviews each governance instrument before it goes to the Prosecutor General, considers tools for the AI Tool Register, and receives regular updates on the programme.

HOW IT WORKS

Short, focused meetings with papers circulated in advance. Minutes are circulated to members for comment, then signed by the Chair.

FIRST HUNDRED DAYS

Three meetings, five governance documents endorsed, and Microsoft Copilot approved for all staff. The record is set out under Gate 02.

Portraits stylised using AI.

GATE 02 OF 10

The AI Governance Committee has met at least three times, with minutes.

02

VERDICT

MET

PLAN MILESTONE

Day 100 · 19 Nov

WHAT WAS DELIVERED

The Committee met three times inside the period, on Days 65, 82 and 84, which meets the gate. Each meeting worked to a published agenda, considered drafts circulated in advance, and is recorded in minutes that were circulated to members for comment and then signed by the Chair, with presentation slides and the instruments reviewed attached as annexes.

Across the three meetings the Committee endorsed five governance documents, approved Microsoft Copilot for all staff, adopted a rule on marking published AI-generated content, and endorsed a Direction to investigating authorities. Members raised questions that shaped later work, including how PGO would identify AI-generated material in submissions it receives, which the Direction now addresses.

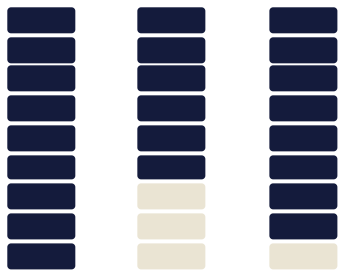
WHAT FOLLOWS

The Committee's next meeting will review the evidence and court-facing guide and the international standards alignment tool (see Gate 3).

ON THE PMS PORTAL

Committee papers are also published on PGO's Project Management System portal, built by the PGO IT team. The AI Governance Committee is the portal's first user (see Chapter 04).

ATTENDANCE BY MEETING



9/9
M01 · Day 65
In person

6/9
M02 · Day 82
In person

8/9
M03 · Day 84
Online

Each block is one member. Members unable to attend sent apologies.

3/3

meetings required by the gate, all held with signed minutes

GATE 02 · THE COMMITTEE'S RECORD

Three meetings held

MEETING 2026/01

Thursday 15 October 2026 Day 65

14:15 – 15:02
Kaamil Didi Maalan
9 of 9 present

AGENDA

01 PGO-GDE-AI-001 Everyday Use Guide

02 PGO-REG-AI-001 AI Tool Register

03 PGO 2.0 project update

OUTCOMES

- Everyday Use Guide endorsed without changes.
- AI Tool Register endorsed with two changes: legal research added to Copilot's proposed uses, and case-related data added to its prohibited uses.
- Microsoft Copilot approved for all staff as an enterprise (Category B) tool.
- Both instruments forwarded to the Prosecutor General, and since endorsed.

MEETING 2026/02

Sunday 1 November 2026 Day 82

14:30 – 14:57
Kaamil Didi Maalan
6 of 9 present

AGENDA

01 PGO-GDE-AI-003 Incident Reporting guide

02 PGO-FRM-AI-001 AI Incident Report Form

03 PGO-FRM-AI-003 AI Use Record

04 Marking of published AI-generated content

05 PGO 2.0 project update

Rescheduled from Wednesday 28 October.

OUTCOMES

- All three instruments endorsed as submitted and forwarded to the Prosecutor General.
- AI-generated content published by PGO will carry the PGO 2.0 logo in place of AI-tool watermarks.
- Members asked that AI tools add no administrative burden, and that retention of AI use records be made transparent.

MEETING 2026/03

Tuesday 3 November 2026 Day 84

14:00 – 14:33
Online, Microsoft Teams
8 of 9 present

AGENDA

01 PGO-DIR-AI-001 Direction on disclosure of AI use

OUTCOMES

- Direction endorsed with amendments, including a new title and corrected cross-references.
- Forwarded to the Prosecutor General and issued on Day 85.
- A guide on how disclosed AI use bears on evidential weight to follow.

Convened at short notice at the Prosecutor General's request for an expedited review.

GATE 03 OF 10

Every remaining instrument in the Day 20 to Day 75 schedule has been issued and activated, and meets the five operational tests.

VERDICT

LARGELY MET

PLAN MILESTONE

Days 20–75 · 31 Aug–25 Oct

ALREADY IN PLACE

Five of seven instruments in force; the remaining two drafted.

INSTRUMENT PIPELINE AT DAY 100

REFERENCE	INSTRUMENT	PLAN	DRAFTED	COMMITTEE ENDORSED	PG ENDORSED
PGO-GDE-AI-001	Everyday Use Guide	Day 20	●	●	●
PGO-REG-AI-001	AI Tool Register	Day 25	●	●	●
PGO-FRM-AI-001	AI Incident Report Form	Day 25	●	●	●
PGO-GDE-AI-003	Incident Reporting guide	Day 35	●	●	●
PGO-FRM-AI-003	AI Use Record	—	●	●	●
PGO-GDE-AI-002	Evidence and Court-Facing Work	Day 60	●	◍	○
PGO-ALN-AI-001	International Standards Alignment	Day 75	●	◍	○

● Complete ◍ Next step, pending ○ Not started

WHAT WAS DELIVERED

All seven scheduled instruments have been drafted. Five have been endorsed by the Committee and then by the Prosecutor General, and are in force: the Everyday Use Guide, the AI Tool Register, the incident reporting guide, the AI Incident Report Form and the AI Use Record.

Beyond the schedule, PGO issued a Direction to investigating authorities on disclosing AI use (PGO-DIR-AI-001), and drafted a Human Rights and Due Process Impact Assessment form (PGO-FRM-AI-002), which the Policy makes a precondition of any high-risk deployment.

WHAT REMAINS

Two of the seven scheduled instruments, the evidence and court-facing guide and the international standards alignment tool, are not yet in force. They have not yet been reviewed by the Committee. Both plan dates have passed.

The gate is therefore rated largely met: five of the seven scheduled instruments are in force, and the remaining two are drafted and awaiting Committee review, endorsement, activation and testing.

GATE 03 · THE INSTRUMENTS

The governance set, one instrument at a time

Three core instruments have been in force since Day 0. The remaining instruments turn them into everyday practice. Their status at Day 100:

PGO-GDE-AI-001

Everyday Use Guide

ALL STAFF | IN FORCE

The practical rules for using approved AI tools in everyday, non-case work: what may be done, what may never be done, and how to verify what a tool produces before relying on it. Endorsed by the Committee without change on Day 65.

PGO-REG-AI-001

AI Tool Register

ALL STAFF; SUPERVISING PROSECUTORS | IN FORCE

The authoritative list of AI tools approved for use, with each tool's category, risk level, permitted and prohibited uses, and conditions. Its first entry is Microsoft Copilot. No tool may be used on PGO work unless it is on the Register.

PGO-GDE-AI-003

Incident Reporting guide

ALL STAFF | IN FORCE

How to recognise and report an AI incident, from a fabricated citation to case data entered into an unapproved tool, and what happens after a report. Endorsed by the Committee on Day 82 and since by the Prosecutor General.

PGO-FRM-AI-001

AI Incident Report Form

ALL STAFF | IN FORCE

The controlled form for raising an AI incident, used with the incident reporting guide and the incident log. Endorsed by the Committee on Day 82 and since by the Prosecutor General.

PGO-FRM-AI-003

AI Use Record

PROSECUTORS | IN FORCE

The human record kept only where the Policy requires it, for court-facing work in the highest-risk category. Routine use is captured by Mafini's activity log instead. Endorsed by the Committee on Day 82 and since by the Prosecutor General.

PGO-GDE-AI-002

Evidence and Court-Facing Work

PROSECUTORS | AWAITING COMMITTEE

The duties that apply when AI touches evidence or anything placed before a court: candour to the court, preservation of originals, verification and disclosure. Placed last among the guides by design, because it carries the highest consequence if written badly.

PGO-ALN-AI-001

International Standards Alignment

COMMITTEE; AI LEAD | AWAITING COMMITTEE

Maps the governance set against international standards, including the UNESCO Recommendation on the Ethics of AI, the UNESCO Guidelines for AI in Courts and Tribunals, and ISO/IEC 42001, recording where PGO aligns and where gaps remain.

PGO-DIR-AI-001

Direction on Disclosure of AI Use

INVESTIGATING AUTHORITIES | ISSUED DAY 85

Requires every submission to PGO to carry an AI Use Declaration stating whether AI was used on the material and how, and to preserve originals. Addressed to the investigating authorities listed below.

IN FOCUS

The Direction on Disclosure of AI Use

Investigating authorities increasingly use tools with AI features, from transcription and translation to image enhancement and matching. Many are lawful and useful. But a prosecutor cannot tell from a file whether AI was used, and PGO does not try to detect it; it asks the submitting authority to declare it.

From 4 November 2026, every submission to PGO carries an AI Use Declaration. Where no AI was used, a single tick says so; a nil declaration matters, because without one PGO cannot tell whether AI was not used or simply not mentioned. Where AI was used, the declaration identifies each affected item, what the AI did, the tool, whether the original is kept, and whether an officer checked the output.

The Direction also sets two firm lines. A statement of a suspect, victim or witness must be in that person's own words; text drafted, rephrased or summarised by generative AI is not accepted as a statement. And where AI has been applied to an exhibit, the original is kept and remains the exhibit of record.

ADDRESSED TO

- Maldives Police Service
- Maldives Customs Service
- Anti-Corruption Commission
- Maldives Inland Revenue Authority
- National Integrity Commission
- Human Rights Commission of the Maldives
- Elections Commission
- Ministry of Defence
- Presidential Commissions

Issued under Article 223 of the Constitution and section 15 of the Prosecutor General's Act (Law No. 9/2008). Classification: public.

GATE 04 OF 10

All staff are recorded as trained and assessed as competent, or are recorded with a scheduled reassessment date.

VERDICT

LARGELY MET

PLAN MILESTONE

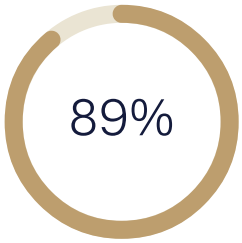
Day 70 · 20 Oct

ALREADY IN PLACE

186 of 193 staff, 96%, trained and certified.



AI Essentials
186 of 193 staff



UNESCO–Oxford course
171 of 193 staff certified

WHAT WAS DELIVERED

186 of 193 staff, 96%, completed *AI Essentials: Understanding and Working with AI*, a mandatory course delivered by the Future Institute and MINDCo under the national Digital for All literacy campaign. The course is assessed and certified, so each completion is also a recorded assessment of competence.

PGO's own rules for using AI are set out alongside it in the Everyday Use Guide, which is in force for all staff.

AHEAD OF THE GATE

The gate asked for one assessed course. Staff went further: 171 have also completed the UNESCO and Saïd Business School (University of Oxford) course *AI, Justice and the Rule of Law* and received certificates, and all three specialist staff planned for the period have earned EC-Council AI certifications. The course and these programmes are described on the following pages.

TIMING

The plan set Day 70, 20 October, as the date by which all staff would be trained. By the Committee's first meeting on Day 65, 94 staff had completed the course; 186 had completed it by Day 80, 30 October, ten days after the planned date. Seven staff had not completed it by Day 100, and they are not yet recorded with reassessment dates, so the gate is rated largely met.

Staff figures exclude auxiliary staff.



The Prosecutor General taking part in an AI Essentials session.

GATE 04 · FEATURE

AI Essentials: Understanding and Working with AI

Future Institute and MINDCo · Digital for All

A practical foundation course for public officers: what generative AI is, when and how to use it, how to work with it well, how to judge what it produces, and how to stay accountable for the result.

This is the course that met the gate. It was led by Future Institute facilitators, with realistic scenarios, demonstrations and hands-on exercises in an approved AI tool. The Institute's online learning platform carried the slides, activities, readings and assessments, so participants could keep working between and after the sessions.

The course is built around four habits that match PGO's own rules for using AI: decide whether AI belongs in the task, brief it clearly, check what comes back, and remain responsible for what is used. Most modules end in an assessment, and the certificate is awarded only after a final exam.



186 of 193 staff completed and certified

Excludes auxiliary staff

10	66	1
hours of facilitated learning	assessed questions, plus a practical exercise	certificate, awarded on completion

THE FOUR DS

01 Delegation
Should AI be used?

Decide whether AI belongs in a task at all, which part it should do, and what must stay with the officer.

02 Description
Brief it well

Define the result needed, give relevant context and boundaries, set quality criteria, and improve the work in stages.

03 Discernment
Judge the output

Evaluate what AI produces, check important claims, and catch errors before they reach anyone else.

04 Diligence
Stay accountable

Protect information, keep human oversight, and take responsibility for how the final output is used.

DELIVERED BY Future Institute MINDCO Maldives Innovation and Digital Company

GATE 04 · FEATURE

Inside the course

THE LEARNING PATH

01 **Your AI starting point**
A short survey of each participant's experience, confidence, expectations and concerns.

02 **Human intelligence to artificial intelligence**
What AI, generative AI and AI assistants can do, where they fail, and why human judgement remains essential.

03 **Safe start: minimum rules for AI use**
Choosing appropriate systems, protecting sensitive information, reviewing outputs, and knowing when to stop and ask.

04 **Delegation: should AI be used?**
Mapping which work AI should do, which stays with the human, and when AI should not be used at all.

05 **Description: working effectively with AI**
Clear briefs, context, quality criteria and targeted iteration, practised in a live build and a prompt lab.

06 **Create a learning game with AI**
In pairs, participants build, test and improve a 5–8 challenge game, then reflect individually.

07 **Take-home assessment**
Twenty questions, completed outside the facilitated sessions.

08 **Discernment and diligence**
Evaluating AI output and remaining accountable for AI-assisted work.

09 **AI opportunities in government**
Authoritative data, interoperability, the once-only principle, connected services and oneGov.

10 **Final assessment**
Applying all four Ds to a realistic public-service task, with a 26-question final exam.

11 **Course feedback**
Participants record what was useful and how their confidence has changed.

COURSE MATERIALS

Lecture slides for every module, a safe-use checklist, a learner guide and additional reading, all kept on the Institute's learning platform for participants to return to.

ASSESSMENT AT EVERY STEP

Module checks	4 × 5 questions
Prompt lab	practical upload
Take-home	20 questions
Final exam	26 questions



Aishath Muhudha presenting a module.

GATE 04 · FEATURE

What participants took away

AI Essentials aimed to build habits as well as knowledge: using approved tools, checking their output, and keeping responsibility with the officer.

WHAT PARTICIPANTS LEARNED

- What generative AI and AI assistants are, what they do well, and where they fail.
- The minimum rules for safe use: approved tools only, no sensitive information in public tools, and when to stop and ask.
- How to decide whether AI belongs in a task at all, and which part must stay with the officer.
- How to brief AI clearly, check what it produces, and remain accountable for the result.

GREATER AWARENESS

- That AI can be fluent and confidently wrong, so every important claim needs checking.
- Why case information stays out of public AI tools, and what PGO's own rules require.
- That responsibility for AI-assisted work stays with the person who signs it.

SKILLS GAINED

- Writing a clear brief: the result needed, the context, the boundaries and the quality bar.
- Improving a draft through staged, targeted iteration.
- Verifying facts, figures and references in AI output before relying on it.
- Mapping a task to decide what AI should do and what it should not.

PUTTING IT INTO PRACTICE

The course is designed to carry into everyday work: using approved AI tools for drafting, summarising and research, briefing them with care, checking what they return before relying on it, and keeping case information out of AI tools as PGO's rules require.

OUTCOMES

186/193

staff, 96%, completed the course and earned the certificate

66

assessed questions, from module checks to a final exam applying all four Ds

Positive

participant feedback, with staff reporting greater confidence in using AI safely; results will inform the next stage of training

GATE 04 · FEATURE

Who taught the course

AI Essentials was delivered by the Future Institute and MINDCo under Digital for All, the national digital and AI literacy campaign. These are the people who taught it.

Future Institute

MINDCO
Maldives Innovation and Digital Company



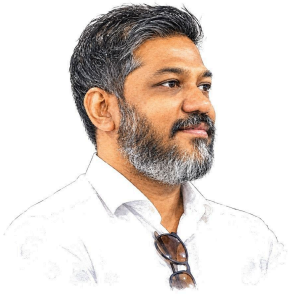
Mohamed Ushau
General Manager and Head of Future Institute



Aishath Muhudha
Instructional Designer



Ismail Lujain Jaleel
Programme Associate for Data & AI



Ismail Azeem
Programme Associate for Data & AI

A COURSE BUILT FOR PUBLIC OFFICERS

The course started from the work public officers already do, and asked where AI can help, where it should not be used, and who answers for the result. It is the same approach PGO takes in its own governance set.

BEYOND THE INDIVIDUAL TASK

The closing module turned to government-wide reform: authoritative data, systems that work together, asking citizens for information only once, and connected services under oneGov.

186 members of staff, 96% of the 193, completed AI Essentials and received the certificate by Day 80. It is the foundation every other course in PGO's programme builds on.

Portraits stylised using AI.

GATE 04 · IN PICTURES

Learning together

Sessions were run in small groups, with facilitators working alongside participants on practical, low-risk tasks.



An AI Essentials session, delivered under Digital for All, the national digital and AI literacy campaign.



Mohamed Ushau leading a session.



Ismail Azeem working with a participant.



Ismail Lujain Jaleel during a practical exercise.

GATE 04 · FEATURE

AI, Justice and the Rule of Law

UNESCO and Saïd Business School, University of Oxford

A global course for legal and judicial professionals on how artificial intelligence is changing justice systems, and how to use it while upholding human rights and the rule of law.

Funded by the European Union and developed by Saïd Business School, University of Oxford, in partnership with UNESCO, the course draws on the Faculty of Law and the Blavatnik School of Government, with contributions from the Oxford Institute of Technology and Justice and the Institute for Ethics in AI. It is self-paced and online, around 18 hours of core learning, and the certificate requires every module to be completed and the graded quizzes passed. PGO opened it to all staff, to be taken after AI Essentials, so that prosecutors and support staff share a common grounding in AI and fair-trial rights.

It complements the governance set directly. PGO's Framework and Policy align with the UNESCO Recommendation on the Ethics of Artificial Intelligence and the UNESCO Guidelines for the Use of AI Systems in Courts and Tribunals; the course teaches the reasoning behind both.



171 of 193 staff hold the certificate

9×

increase since the Committee's first meeting, when 19 staff had completed the course

SIX MODULES

01 AI in legal practice

Tools, opportunities and risks of AI in courts, and the decisions to make before adopting a system.

02 Fairness and accuracy

Sources of bias, the role of data, and how to evaluate error in AI-assisted judicial tools.

03 Transparency

Explainability, data governance, privacy, and the contestability of AI-assisted outcomes.

04 Trust and accountability

Building trust and assigning accountability when AI is used in justice.

05 Access to justice and fair trial

Protecting the right to a fair trial and access to justice in the age of AI.

06 Women's rights

How AI can propagate gender bias, and how it can advance gender justice.

Grounded in the UNESCO Global Toolkit on AI and the Rule of Law for the Judiciary and the UNESCO Guidelines for the Use of AI Systems in Courts and Tribunals.

DEVELOPED BY University of Oxford · Saïd Business School IN PARTNERSHIP WITH unesco · Funded by the European Union

GATE 04 · FEATURE

Who teaches the course

50 faculty and contributors from five continents, among them justices of the Supreme Court of the United Kingdom, a former Master of the Rolls, senior UNESCO officials, and judges from Brazil, Malawi, Singapore and South Africa. Names and positions as listed in the course materials.

COURSE FACULTY

Professor Philippa Webb
Professor of Public International Law, Blavatnik School of Government

Professor Ignacio Cofone
Professor of Law and Regulation of AI, Faculty of Law

UNIVERSITY OF OXFORD EXPERTS

Jeremias Adams-Prassl
Professor of Law, Magdalen College

John Armour
Professor of Law and Finance, Oriel College

Reuben Binns
Associate Professor of Human Centred Computing

Amal Clooney
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Keri Grieman
Research Fellow in Ethics in AI (AI and Law), Oriel College

Kejia Hu
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Alan Morrison
Intesa Sanpaolo Professor of Business, Ethics and Finance, Saïd Business School

Pinar Ozcan
Professor of Entrepreneurship and Innovation, Saïd Business School

Lodovica Raparelli
Head of Research and Projects, Oxford Institute of Technology and Justice

Richard Susskind
Visiting Professor, Faculty of Law; Technology Adviser to the Lord Chief Justice of England and Wales, 1998–2023

Felipe Thomaz
Associate Professor of Marketing, Saïd Business School

Kelly Webb-Davies
AI Consultant, AI Competency Centre

Rebecca Williams
Professor of Public Law and Criminal Law, Pembroke College

GUEST CONTRIBUTORS

Sophia Adams Bhatti
Chair, PROBabLE Futures; Chair, AI in Justice Programme; Non-Executive Board Member, Amnesty International UK

Frederik Zuiderveen Borgesius
Professor of ICT and Law, Radboud University

Haffide Boulakras
Deputy Director, École nationale de la magistrature (ENM)

Michael Briggs
Justice of the Supreme Court, The Right Hon Lord Briggs of Westbourne

Guilherme Canela
Director, Division for Digital Inclusion and Policies and Digital Transformation, UNESCO

Kamel El Hilali
AI and the Rule of Law Specialist, UNESCO

Isabela Ferrari
Federal Judge, Federal Regional Court of the Second Region, Brazil

Mariya Gabriel
Assistant Director-General for Communication and Information, UNESCO

Giulia Gentile
Lecturer in Law, Essex Law School

Juan David Gutiérrez
Associate Professor, Government School, Universidad de los Andes

Sophia Ignatidou
Group Manager for AI Policy, Information Commissioner's Office

Warut Khern-Am-Nuai
Associate Professor of Information Systems, McGill University

Kari Kivinen
Education Outreach Expert, European Union Intellectual Property Office

Ernest Lim
Chan Sek Keong Chair in Private Law, National University of Singapore

Perri Lyons
Director of Operations and Strategy, Office of Amal Clooney; co-lead, Justice for Women initiative

Gianclaudio Malgieri
Associate Professor of Law and Technology, Leiden University

Sarah McCosker
Partner, Lexbridge Lawyers

Yvonne McDermott Rees
Professor of Law, Queen's University Belfast

Ana María Montoya
Director of Data Analytics, World Justice Project

Zione Ntaba
Judge of the High Court, Zomba Registry, Malawi

Golda Rapozo
Executive Director, Women Lawyers Association Malawi

Catherine Régis
Full Professor, Faculty of Law, Université de Montréal

Neil Richards
Koch Distinguished Professor in Law, Washington University School of Law

Philip Sales
Deputy President of the Supreme Court

Margaret Satterthwaite
Professor of Law, NYU School of Law; Faculty Director, Bernstein Institute for Human Rights

Utkarsh Saxena
Co-founder and CEO, Adalat AI

Prateek Sibal
Programme Specialist, Digital Policies and Digital Transformation, UNESCO

Rhiana Spring
Founder and CEO, Spring ACT

Cass Sunstein
Robert Walmsley University Professor, Harvard University

Raquel Vazquez Llorente
Lawyer and Policy Strategist, Emerging Technology

Geoffrey Vos
Master of the Rolls and Head of Civil Justice in England and Wales, January 2021 to October 2026

Sara Wahedi
CEO, Civaam

Jakkie Wessels
Regional Court President, Limpopo Regional Division, South Africa

Cédric Wachholz
Chief, Digital Policies and Digital Transformation Section, UNESCO

Aiden Xu
Judge of the General Division of the High Court, Supreme Court of Singapore

GATE 04 · BUILDING CAPABILITY

A training programme at every level

PGO combined national, international and online providers, from a mandatory course for everyone to advanced certifications for specialists.

SPECIALIST CERTIFICATION

EC-Council AI certifications, through Koenig Solutions

The hundred-day target was to certify the first three specialist staff, and it was met. Batch 1 took place in Bangalore on 21–23 October 2026, and all three participants earned EC-Council certifications in AI programme management and AI security:

PARTICIPANT	CERTIFICATION
Ahmed Adam	Certified AI Program Manager (C|AIPM)
Ali Farsam	Certified AI Program Manager (C|AIPM)
Mohamed Shaffanu	Certified Offensive AI Security Professional (C|OASP)

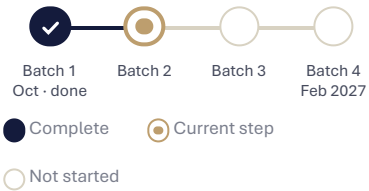
The wider programme certifies fifteen specialist staff in four batches. Batches 2 to 4 run through February 2027 and add Certified Responsible AI Governance and Ethics (C|RAGE) for legal and policy staff and Certified Penetration Testing Professional (CPENT AI) for security staff.

HUNDRED-DAY TARGET



3 of 3 staff planned for the period certified

FULL PROGRAMME, TO FEBRUARY 2027



Fifteen specialist staff across four batches.

COMPLETED · DAY 80

Digital transformation seminar

Two officials attended a three-week seminar on digital transformation and AI in the public service at Wuhan Textile University, organised by the Government of the People's Republic of China, from 10 to 30 October, including study visits to Shenzhen, Wuhan and Shishou.

PLANNED · AFTER DAY 100

Microsoft 365 and Copilot

In-house training for all staff, with Dr Nitin Paranjape as the proposed trainer, planned for after the hundred days. Described on the next page.

PLANNED · 2027

Follow-on training for prosecutors

Two to three days of on-site AI training for around 85 prosecutors, delivered by Koenig Solutions at PGO after Batch 4 completes.



AI training sessions at PGO.

GATE 04 · NEXT IN THE PROGRAMME

Microsoft 365 and Copilot, for every member of staff

Copilot is the first tool on PGO's AI Tool Register. The next step is to make sure every member of staff uses it, and the Microsoft 365 tools around it, well and within the rules.

PGO has planned an in-house, hands-on programme for all staff in two parts: Microsoft 365 best practices, and Microsoft Copilot. The training was planned during the hundred days and will be held after Day 100. It is reported here because it was part of the period's planning, and because it carries the Copilot register entry into everyday practice, including the enterprise data protection that keeps PGO's information inside its own tenancy.

PLANNED · AFTER DAY 100

ALL STAFF | IN-HOUSE

26

topics across two parts

PART 1 · MICROSOFT 365 BEST PRACTICES

01	Selecting the right Microsoft 365 application for each task
02	Using OneDrive efficiently
03	Word: styles and tables
04	Excel: tables, Power Query and PivotTables
05	PowerPoint: layouts and templates
06	Outlook: rules and calendar management
07	Teams chat and collaboration
08	Task management, delegation and monitoring
09	Project management with Teams
10	Meetings: notes and action items
11	Visio: flowcharts and diagrams
12	Approvals and updates
13	SharePoint intranet

PART 2 · MICROSOFT COPILOT

01	Enterprise data protection in Copilot
02	Custom instructions
03	Copilot Search
04	Model selection
05	Prompt Coach
06	Word Agent
07	PowerPoint Agent
08	Excel Agent
09	Creating infographics
10	Copilot Notebooks
11	Referencing files
12	Drafting, summarising and replying to emails
13	Creating agents

PROPOSED TRAINER

Dr Nitin Paranjape

Digital transformation specialist and Microsoft Most Valuable Professional

Dr Paranjape is a digital transformation specialist and a Microsoft Most Valuable Professional (MVP), recognised for his work on the Microsoft platform.

GATE 04 · IN PICTURES

The programme in pictures

Prosecutors and support staff from every part of PGO took part in the training during the hundred days.



AI training sessions at PGO.

GATE 05 OF 10

The AI Tool Register is live and no tool is in operational use outside it.

VERDICT

MET

PLAN MILESTONE

Day 25 · 5 Sep

WHAT WAS DELIVERED

The AI Tool Register is live. It was endorsed by the Committee on Day 65, with two changes, and then by the Prosecutor General, and it is accessible to all staff. Only tools on the Register may be used for PGO work; at Day 100 that means one tool.

Its first entry, Microsoft Copilot, shows how the Register works in practice: the tool is approved, but within a boundary set on the face of the entry, and the Committee tightened that boundary before endorsing it.

REGISTER ENTRY 0001

Microsoft Copilot

APPROVED

Deployment category	B · Enterprise tool
Risk category	1 · Administrative and non-case use
Approved for	All staff, for administrative work, drafting and legal research
Prohibited	Any case-related data or PGO case information
Condition	User must be on the competency record as trained and assessed

1

tool in operational use, and it is on the Register

PLAN VERSUS ACTUAL

The plan had the Register live on Day 25, 5 September. It went live after the Committee's first meeting on Day 65 and the Prosecutor General's subsequent endorsement, roughly two months later.

NEXT

The Prosecutor Assistant will be entered on the Register before the beta is extended beyond the Committee to a selected group of prosecutors for further testing (see Gate 7).

GATE 06 OF 10

The incident log has been exercised end to end at least once.

VERDICT

MET

PLAN MILESTONE

Day 35 · 15 Sep

THE INCIDENT CYCLE, TESTED END TO END ON DAY 98

- Raised — Part A of the form
- Logged — AI Lead's incident log
- Assessed — Part B
- Closed and recorded
- Escalated — to the Committee

WHAT WAS DELIVERED

The incident reporting guide (PGO-GDE-AI-003) and the AI Incident Report Form (PGO-FRM-AI-001) were endorsed by the Committee on Day 82 and then by the Prosecutor General, and are in force. A dedicated mailbox for AI incidents has been set up.

No real incident arose in the period, so PGO ran a deliberate test case, as the plan allows. On Day 98 a scripted near-miss was reported on the controlled form: a staff member copied text from a fictitious case summary into Microsoft Copilot and stopped before submitting it. The AI Lead logged it, assessed it as Medium, recorded that no court or defence notification was needed, closed it with a corrective action, and escalated it to the AI Governance Committee in writing.

Every record was marked TEST, so the exercise cannot be mistaken for a real breach.

WHAT THE TEST SHOWED

The process works as written: the report travelled from the reporter to the AI Lead and on to the Committee within a day. Its one lesson, a near-miss scenario for the Copilot training, is now a corrective action.

5/5

stages of the incident cycle completed in the test

PLAN VERSUS ACTUAL

The plan scheduled the form for Day 25 and the guide for Day 35. Both came into force late in the period, and the log was exercised on Day 98, two days before the gate.

GATE 07 OF 10

The Prosecutor Assistant is in supervised Category 2 use, with a complete fifteen-stage approval record.

07

VERDICT

LARGELY MET

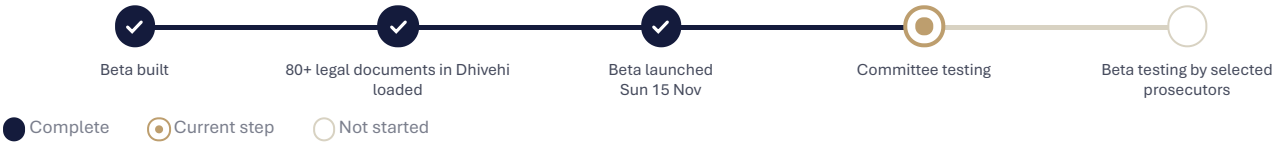
PLAN MILESTONE

Day 85–100 · 4–19 Nov

ALREADY IN PLACE

Early beta in Dhivehi, in testing by the Committee.

FROM BUILD TO TESTING



WHAT WAS DELIVERED

An early beta of the Prosecutor Assistant, PGO's first sovereign AI capability, was launched on Day 96, Sunday 15 November 2026. At this stage it does one thing: staff ask questions in a chat, and it answers from the documents loaded into it, currently more than 80 legal documents in Dhivehi. Dhivehi is built in from this first release.

The beta has been shared with the members of the AI Governance Committee for testing. Live case data is outside its scope, and nothing it produces is filed with a court.

80+

legal documents in Dhivehi the beta answers from

9

Committee members testing the beta

WHAT THE BETA IS NOT

This version should not be read as a preview of the finished tool. The Prosecutor Assistant is planned to become a much fuller capability over the programme; those features will be added in later releases, each taken through the same approval stages before use.

WHAT COMES NEXT

The Committee's testing is a Stage 9 pilot under the AI Governance Policy, and a pilot is not operational use. Approval, Register entry and training (Stages 10 to 12) are still to be completed, so the gate is rated largely met. The Committee's testing will shape the next stage: further beta testing by a selected group of prosecutors.

GATE 08 OF 10

The AI activity log is live, is generating records without user data entry, and the first sample review has been run from those records.

VERDICT

MET

PLAN MILESTONE

Day 95 · 14 Nov

- Built into Mafini
- Live across PGO
- Recording automatically
- Operation demonstrated

WHAT WAS DELIVERED

The AI activity log is live in Mafini, PGO's case management system, and records AI use automatically. No member of staff opens a second screen or fills in a form to report having used a tool: the system logs itself. This was the plan's design principle, and it is now working in production across PGO.

Its operation has been demonstrated, and the first sample review has been run from its records. The log generates records from the system itself rather than from self-reporting, so the records can be used for governance assurance, incident investigation, audit and progress reporting.

The Committee welcomed the approach at its second meeting, where members asked that AI tools add no administrative burden. They also asked that the retention period for these records be made transparent to staff, which PGO will set out.

THE SYSTEM LOGS ITSELF

Self-reported logs tend to lapse when workloads are heavy. Recording at source avoids both, and adds nothing to a prosecutor's day.

0

fields that staff must fill in to record AI use

CAPTURED BY THE SYSTEM

- User identity, role and office
- Capability, model and version
- Timestamp, session and case reference
- Task type, prompt and output
- Whether output was accepted, edited or discarded

Field set as specified in the plan.

GATE 09 OF 10

Prosecutors and frontline support staff are equipped, with acceptance records signed.

VERDICT

IN PROGRESS

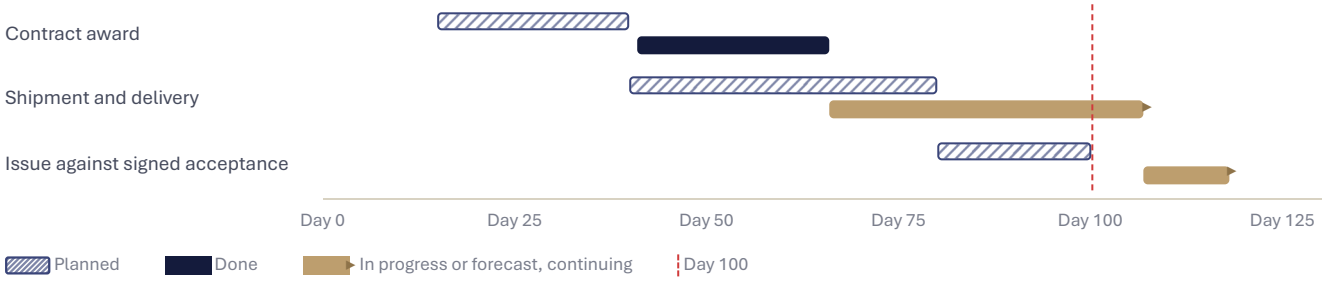
PLAN MILESTONE

Day 80–100 · 30 Oct–19 Nov

ALREADY IN PLACE

Contract awarded; delivery due 26 November.

SCHEDULE, PLAN VERSUS FORECAST



WHAT WAS DELIVERED

The contract for the supply of 2-in-1 laptops for prosecutors, under PGO's "Paperless Prosecution" initiative, has been awarded. The first tender was cancelled and re-issued, and the award followed evaluation of the second.

WHAT REMAINS

No devices have yet been issued, so no acceptance records exist yet. The gate is rated in progress: the contract is in place with the supplier, and what remains is delivery and issue. Delivery was expected in the first week of November, with handover to staff by mid-November. It has been delayed by around three weeks by global shipping delays and high demand for AI-capable hardware, and is now expected on 26 November 2026.

The plan anticipated this risk, rating import delay as medium likelihood and medium impact, and proposed configuring device management while shipments were in transit so that devices are enrolled, not merely delivered, on arrival.

~3

weeks of delay to delivery, from global shipping delays and high demand for AI hardware

RECOVERY

Devices issued against signed acceptance records, including acknowledgement of the acceptable-use conditions, in December 2026.

GATE 10 OF 10

Off-site backup is operating and a restore has been successfully tested and signed off.

VERDICT

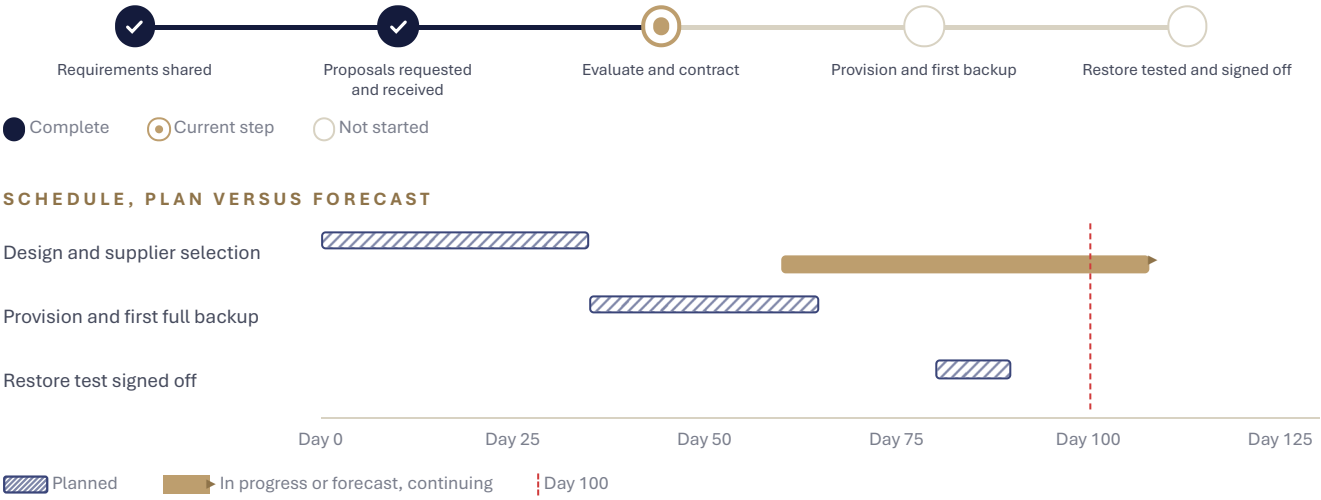
NOT YET MET

PLAN MILESTONE

Day 90 · 9 Nov

ALREADY IN PLACE

Requirements set; proposals received and under evaluation.



SCHEDULE, PLAN VERSUS FORECAST

WHAT WAS DELIVERED

Requirements for an encrypted, immutable, off-site backup were prepared and shared with service providers. Proposals have been received and evaluation is under way.

WHAT REMAINS

No backup service is operating and no restore has been tested. The plan placed supplier selection at Day 35 and a signed restore test at Day 90. Proposals were requested later than planned and have taken longer to arrive than expected.





CHAPTER 04

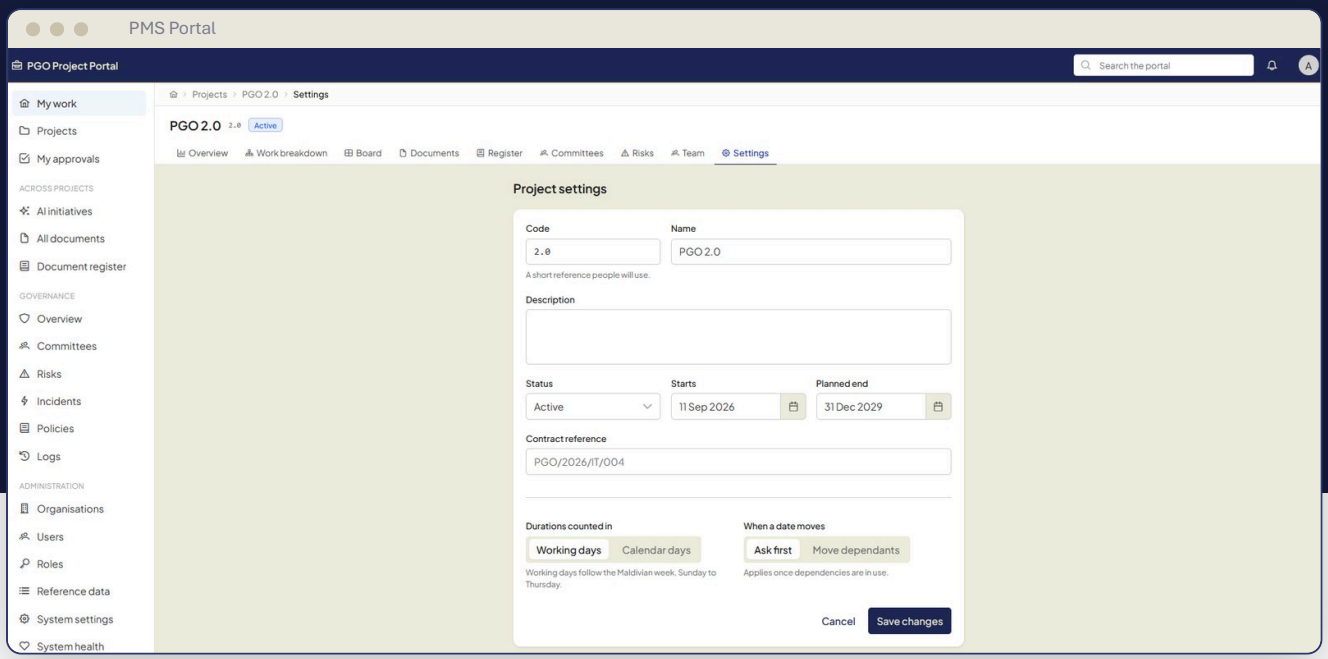
The PMS Portal

The project and governance portal built in-house by PGO's IT team, where PGO 2.0 and its Committee keep their record.

CHAPTER 04 · BUILT IN-HOUSE

One home for the programme's record

PGO 2.0 is run from a project and governance portal built by PGO's own IT team. It gives the programme, its Committee and its records a single home, and it was designed from the start to serve every project and committee in PGO.



The PGO 2.0 project in the PMS Portal: project settings, with the project's work breakdown, board, documents, register, committees, risks and team one click away.

In-house
built and hosted by PGO's own IT team

1st
user: the AI Governance Committee, with all members on the portal

5
areas: my work, projects, cross-project records, governance and administration

Why PGO built it

A programme governed instrument by instrument generates a great deal of record: agendas, drafts, minutes, registers, risks, incidents and approvals. Spread across email and shared folders, that record is difficult to find and to audit. The portal brings it into one place, with each item linked to the project and committee it belongs to.

Credit

The portal was designed and built by the PGO IT team. PGO 2.0 is its first project and the AI Governance Committee its first committee.

CHAPTER 04 · THE PMS PORTAL

What the portal does

My work and approvals

- A personal view of each user's tasks across projects
- An approvals queue, so nothing waits unseen

Projects

- Overview, work breakdown and a task board
- Documents, register, committees, risks and team for each project
- Status, start and planned end dates, and contract references

Across projects

- A register of AI initiatives across PGO
- All documents, and a controlled document register

Governance

- Committees, with members, papers and meetings
- Registers for risks, incidents and policies
- Logs, for an auditable record of activity

Administration

- Organisations, users and roles, for access by need
- Reference data, system settings and system health

Scheduling built for the Maldives

- Durations in working days that follow the Maldivian week, Sunday to Thursday, or in calendar days
- A choice, when a date moves, to ask first or move dependent tasks automatically

WHAT IT CONTRIBUTES TO PGO 2.0

Committee papers in one place

Agendas and draft instruments for AI Governance Committee meetings are published on the portal alongside the email invitation, so members can find the current version of every paper.

A home for the governance records

The portal's registers for policies, risks, incidents and logs, and its register of AI initiatives, give the records the governance set requires a single, searchable place.

Programme tracking

PGO 2.0 is set up as a project, with its work breakdown, board and documents, so progress can be followed and reported from one source.

WHAT IT OFFERS BEYOND PGO 2.0

Every project and committee

The portal is built for any project or internal committee in PGO, not only PGO 2.0.

Partners, with limited access

PGO plans to give vendors and contractors access restricted to their own areas, for shared tracking and reporting.

Built and owned locally

Designed by the PGO IT team, on PGO's own domain, and adaptable as PGO's needs change.

Every gate in this report is judged on evidence. A single place for that evidence makes the next hundred days easier to run and to check.





CHAPTER 05

Lessons from the Hundred Days

What PGO would keep, and what it would change, as it moves from proving the pathway to using it.

CHAPTER 05

Eight lessons

01 Fix the governance calendar first

Every gate ran through the AI Lead and the Committee, so the Committee's calendar set the pace for everything else, and endorsements clustered in the second half of the period. In the next phase, meeting dates are fixed before delivery dates are.

02 Keep the approval pipeline moving

Committee endorsement is not the end of the path: the Prosecutor General's approval follows. Three endorsed instruments waited weeks for that step, and two more were still awaiting the Committee's review at Day 100. A standing turnaround for approvals, and papers considered by written procedure between meetings, would keep the queue from building up near deadlines.

03 Give supplier-dependent work more margin

Every gate within PGO's own control was met or largely met. The two gates still in progress, devices and backup, depended on outside suppliers and global supply chains. Engaging suppliers on Day 1, and asking for proposals with firm reply dates, matters more than a tight internal timetable.

04 Build on established curricula

Training was the period's clearest success because PGO drew on national and international programmes, from the national Digital for All campaign to UNESCO and Oxford's Saïd Business School, rather than writing its own from scratch. PGO's own rules were then taught alongside them.

05 Keep the governance-first rule

Copilot reached staff only after its register entry was endorsed; the Prosecutor Assistant went to the Committee for testing before any wider testing. Neither went live with a note on file.

06 Design out the burden

Logging AI use automatically in Mafini, rather than asking staff to report it, was accepted readily at Committee level. The same principle, that the system does the record-keeping, should shape every capability that follows.

07 Set the bar high and report against it

Ten demanding gates showed exactly where the pathway holds. The Day 200 plan keeps the same standard.

08 Collect the evidence as you go

The five operational tests were demanding by design, but the evidence for them, such as activation sessions and attendance, owners and first cycles, is easiest to capture at the time. Recording it from the start makes each test easier to evidence.



CHAPTER 06

The Road Ahead

The open items carried forward, who owns them, and PGO's priorities for the next hundred days, to Day 200.

CHAPTER 06

Carried forward, with owners

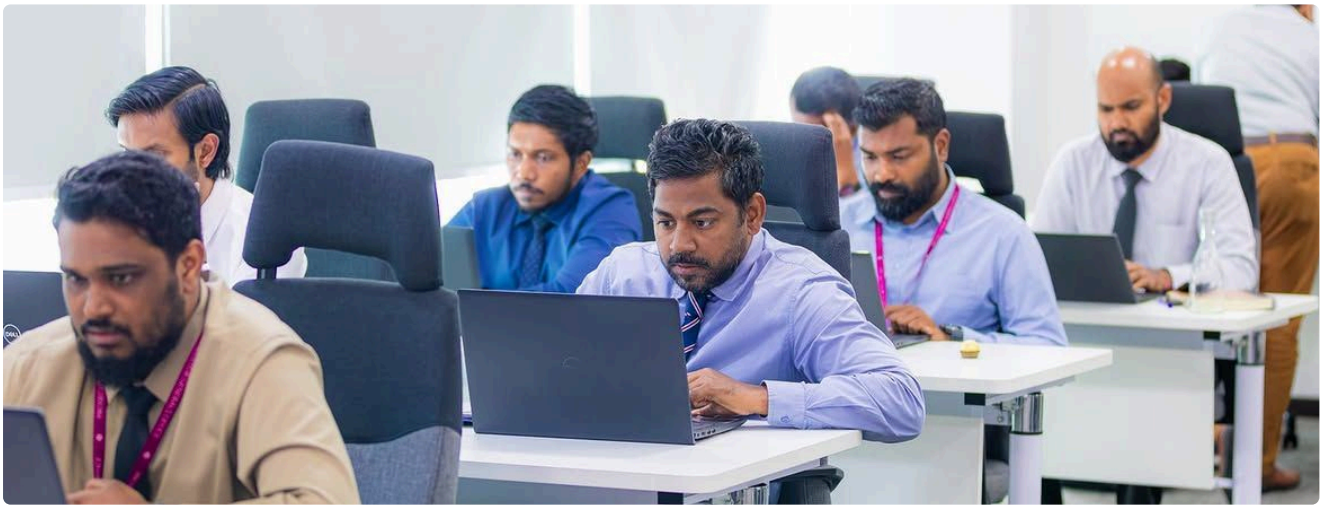
Every open gate now has an owner and a date. The aim for the next hundred days, to Day 200 on 27 February 2027, is to complete the five gates not yet fully met and to extend beta testing of the Prosecutor Assistant from the Committee to a selected group of prosecutors.

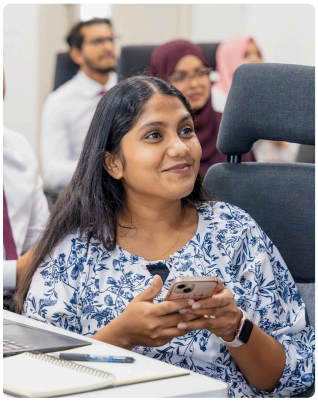
6

items carried forward from five gates, each with an owner and a target

CARRY-OVER REGISTER

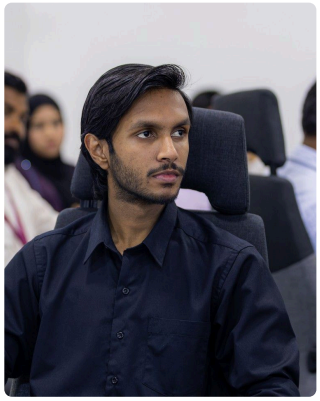
GATE	OPEN ITEM	OWNER	TARGET
G03	Committee review of the evidence and court-facing guide and the standards alignment tool	AI Governance Committee	December 2026
G04	Remaining seven staff complete AI Essentials, or are recorded with reassessment dates	Designated AI Lead	December 2026
G07	Prosecutor Assistant approval, Register entry and training (Stages 10 to 12)	Designated AI Lead	February 2027
G09	Devices issued against signed acceptance records	AI Procurement Lead	December 2026
G10	Off-site backup contracted and provisioned	AI Procurement Lead	December 2026
G10	Restore tested and signed off	AI Lead; IT Security Officer	February 2027











AI training sessions at PGO.

Priorities for the next hundred days

01

Prosecutor Assistant beta, wider testing

Complete the Committee's testing, enter the Prosecutor Assistant on the AI Tool Register, and extend the beta to a selected group of prosecutors for further testing.

02

The full governance set in force

All seven scheduled instruments endorsed, activated and tested, including the evidence and court-facing guide.

03

Infrastructure in place

Devices in prosecutors' hands, and case records backed up off-site with a restore tested and signed off.

04

Specialist depth

EC-Council Batches 2 to 4 completed by February 2027, bringing certified specialists to fifteen, and the remaining staff through the UNESCO–Oxford course.

GATES CLOSING, BY FORECAST



The forecast assumes the Committee reviews the last two instruments in December and that the backup contract is signed in the same month. If either slips, the gates that depend on it move with it, and that will be reported.

ALSO SCHEDULED

Microsoft 365 and Copilot training, all staff	After Day 100
EC-Council Batches 2 to 4	By February 2027
Follow-on AI training for around 85 prosecutors	After Batch 4
Day 200	Saturday 27 February 2027

Governance before deployment

The Day 200 report will follow the same method: each gate tested against PGO's own records.



AI training sessions at PGO.

ANNEXES

A · Governance instrument register at Day 100

REFERENCE	TITLE	VER.	STATUS	ENDORSEMENT
PGO-STR-AI-001	Institutional AI Strategy 2026–2028	1.0	IN FORCE	11 Aug 2026
PGO-FWK-AI-001	AI Governance Framework	1.0	IN FORCE	11 Aug 2026
PGO-POL-AI-001	AI Governance Policy	1.0	IN FORCE	11 Aug 2026
PGO-GDE-AI-001	Everyday Use Guide	1.0	IN FORCE	Committee 15 Oct; PG endorsed
PGO-REG-AI-001	AI Tool Register	1.0	IN FORCE	Committee 15 Oct; PG endorsed
PGO-GDE-AI-003	Incident Reporting guide	1.0	IN FORCE	Committee 1 Nov; PG endorsed
PGO-FRM-AI-001	AI Incident Report Form	1.0	IN FORCE	Committee 1 Nov; PG endorsed
PGO-FRM-AI-003	AI Use Record	1.0	IN FORCE	Committee 1 Nov; PG endorsed
PGO-GDE-AI-002	Evidence and Court-Facing Work	1.0	AWAITING COMMITTEE	Circulated 10 Nov
PGO-ALN-AI-001	International Standards Alignment	1.0	AWAITING COMMITTEE	Circulated 10 Nov
PGO-FRM-AI-002	Human Rights and Due Process Impact Assessment	0.2	DRAFT	—
PGO-DIR-AI-001	Direction on Disclosure of AI Use	1.0	IN FORCE	Issued 4 Nov 2026

Version numbers are assigned on drafting; status shows endorsement.

B · AI Governance Committee meetings

MEETING	DATE	DAY	MODE	PRESENT	PRINCIPAL OUTCOMES
2026/01	Thu 15 Oct	65	In person	9/9	Everyday Use Guide and Tool Register endorsed; Copilot approved
2026/02	Sun 1 Nov	82	In person	6/9	Incident guide, incident form and AI Use Record endorsed; logo rule
2026/03	Tue 3 Nov	84	Online	8/9	Direction on Disclosure of AI Use endorsed as amended

Minutes of each meeting held were circulated to members for comment, finalised, and signed by the Chair, with slides and instruments reviewed attached as annexes.

C · Calendar

DAY	DATE
0	Tue 11 Aug 2026
15	Wed 26 Aug
20	Mon 31 Aug
25	Sat 5 Sep
30	Thu 10 Sep
35	Tue 15 Sep
40	Sun 20 Sep
45	Fri 25 Sep
55	Mon 5 Oct
60	Sat 10 Oct
65	Thu 15 Oct
70	Tue 20 Oct
75	Sun 25 Oct
80	Fri 30 Oct
85	Wed 4 Nov
90	Mon 9 Nov
95	Sat 14 Nov
100	Thu 19 Nov 2026
200	Sat 27 Feb 2027

D · Glossary

AI Lead	The Designated AI Lead appointed under the AI Governance Policy; chairs the AI Governance Committee.
Category B	A deployment category in the Tool Register for enterprise tools, such as Microsoft Copilot, operated under PGO's own tenancy.
Category 2 scope	Use over published or internal non-case material, with no live case data and nothing filed with a court.
Day 0 / Day 100	11 August 2026, when the core instruments came into force / 19 November 2026.
Fifteen-stage lifecycle	The Policy's approval pathway for any AI capability, from defining a use case to supervised use and review.
Five operational tests	The plan's standard for an instrument to count as operational: owner, activation, live use, a full cycle, and written confirmation.
Mafini	PGO's case management system, into which PGO 2.0 capabilities are built.
PMS Portal	PGO's Project Management System portal, built by the PGO IT team.
Sovereign AI programme	PGO's strategic AI licensing, sovereign deployment and consultancy engagement with Thaana AI.
C|AIPM, C|OASP, C|RAGE	EC-Council certifications in AI programme management, offensive AI security, and responsible AI governance and ethics.





PGO 2·0

Justice First:
Human-Led, AI-Empowered

The First Hundred Days

Report on Execution · Day 0 to Day 100

PGO-RPT-AI-001 · VERSION 1.0 · NOVEMBER 2026

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