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ORIGINAL PAPER

Ethics of AI in Africa: Interrogating the role of Ubuntu and AI governance initiatives

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Abstract

One of the common concerns raised in AI ethics scholarship is the overly western-centric nature of ongoing AI ethics discourse and governance initiatives. This has recently prompted many commentators to proclaim the emergence of an epistemic injustice or "ethical colonialism". Many scholars point to the role of indigenous ethical systems, particularly Ubuntu, in addressing this flaw. In the meantime, a series of national and continental AI governance initiatives are also emerging in Africa. But the extent to which Ubuntu and emergent AI governance initiatives contribute towards addressing the problem of epistemic injustice is yet to be interrogated. In a novel approach, I examine in this article the extent to which Ubuntu and AI governance initiatives in Africa articulate an African perspective of AI ethics, and hence address the epistemic injustice. I argue that neither the normative structure of Ubuntu nor recent AI governance initiatives offer a clear, coherent and practicable framework of "African AI ethics". I further show that the much-touted "African" ethics of Ubuntu is rarely referenced or implied in recent national or continental AI governance initiatives. I close the article with a call for defining African AI ethics by relevant actors in the continent.

Keywords AI ethics · African ethics · AI policies · Epistemic injustice · Ethical colonialism · AI governance · Digital colonialism · Africa

Introduction

A recurring concern in Artificial Intelligence (AI) ethics scholarship is the overly western-centric nature of ongoing AI ethics initiatives. Charges that current AI ethics and governance discourse excludes "African narratives" are increasingly common in the literature (Eke & Ogoh, 2022). Corollary to this are strong claims of an impending "digital", or "algorithmic" colonisation of Africa, owing to the lack of African values or ethics in AI ethics (Adams, 2021; Birhane, 2023; Mohammed et al., 2020; Ndiaye, 2024).[1] As one way of overcoming this challenge, a growing body of scholarship highlights the imperatives of embracing "African values" in AI ethics to address the "epistemic injustice". The role of Ubuntu, in this regard, is often presented as a viable complementary African ethical framework of AI ethics (Birhane, 2021; Coecklbergh, 2022; Eke & Ogoh, 2022; Jecker et al., 2022; Mhlambi, 2020; Mhlambi & Tiribelli, 2023; Ruttkamp-Bloem, 2023).

On the other hand, a flurry of AI ethics initiatives is emerging in Africa in recent years, mainly in the form of national and continental AI strategies (AI Blueprint, 2021; Algeria, 2021; AU AI Strategy, 2024; Benin, 2023; Egypt, 2019, 2023; Ghana, 2022; Mauritius, 2018; Rwanda, 2023; Senegal, 2023). But to what extent Ubuntu and AI strategies offer an indigenous African perspective of AI ethics that address the limitations of current AI ethics has not been sufficiently interrogated. Nor has the interplay between the two been examined.

Exceptions in this regard are Jecker et al., Coecklbergh and Gordon who have explored the question of how a relational account of social robots informed by Ubuntu ethics may contribute in expanding narrower and western-centric approaches to AI ethics and governance (Coecklbergh, 2022; Gordon, 2022; Jecker et al., 2022). These interventions contribute greatly to the literature, but the starting

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point in almost all cases is that Ubuntu is undoubtedly a pan-African ethical system, and its normative structures are clear enough to serve as a framework of AI ethics and hence address the "epistemic injustice" in AI ethics. This article takes a different approach by exploring whether departing from such starting points is warranted, a question not yet directly examined in the AI ethics literature. Nor has the literature explored the extent to which, and whether, emergent AI governance policy instruments at the national and continental level in Africa embrace Ubuntu as a framework of AI ethics.

This article is an attempt to lessen this void. In a novel approach, I critically interrogate the role of and the nexus between Ubuntu and emergent AI governance initiatives in advancing an "African" perspective of AI ethics. I argue that despite much value attached to Ubuntu in the literature, lack of clarity in its normative structure and how it would apply to the AI context undercut its potential as a complementary framework of AI ethics. I further demonstrate that except for one of the five national AI strategies surveyed in this study—i.e. Benin's AI Strategy—national and continental AI strategies do not articulate a unique African ethical perspective of AI. Even with respect to Benin, I show that Ubuntu is included only indirectly, and without elaboration of how it applies to AI. I conclude the article with an emphasis that the next step in the effort to democratise and diversify AI ethics should be defining "African ethics" in a manner that unpacks its principles and specifies how they would apply in the development and governance of AI technologies.

For purposes of this article, "African ethical perspectives" means specific and indigenous ethical values or principles relevant to AI that are unique to communities in the continent. The phrase "African AI ethics" should also be seen as a pluralist set of values that leave room for diversity rather than a singular, monolithic ethical framework. By "western AI ethics", I simply mean frameworks of AI ethics advanced by institutions in the western world. In this respect, I refer to the AI ethics guidelines of the Organization for Economic Cooperation and Development (OECD) as the archetypal "western" AI ethics framework (OECD Recommendation, 2019).

The rest of the article unfolds in five sections. After outlining the underlying research methodology in the second section, I provide an overview of the "critique of western AI ethics" in the third section. I then critically examine the limits of Ubuntu in offering a viable African account of AI ethics in the fourth section. The fifth section explores a case study of five national AI strategies and initiatives for continental AI strategies, including the newly adopted AU continental AI strategy, to locate any African perspective of AI ethics. The final section concludes the article.

Approach

As highlighted above, I examine national AI strategies or policies, which I also refer to as AI governance initiatives, adopted between 2018 and 2024 in five African countries. The selection of the five national AI strategies is dictated by two factors. First, the five are the only African countries to have published national strategies in English at the time of writing. Algeria and Senegal's AI strategies, for instance, are published only in French (Algeria, 2021; Senegal, 2023). Second, despite recent reports that suggest the adoption of AI strategies in thirteen African countries, most of them are not publicly available (UNESCO Survey, 2021: 22). Ethiopia, for example, reportedly adopted a national AI strategy in July 2024, but it has not been published at the time of writing (Ethiopian Artificial Intelligence Institute, 2024). In other cases, the strategies are of broader scope where AI ethics is barely addressed (Sierra Leone Science, Technology and Innovation Policy, 2023).

While five is a small sample for a continent of fifty-five countries, a closer examination of the five case studies will help uncover whether there is any emerging approach to AI ethics that draws upon indigenous values such as Ubuntu. To further strengthen the case study—and to uncover any emerging niche African AI ethics, I explore recently introduced AI governance initiatives at the continental level. These are the newly adopted AU continental strategy, and an initiative launched under the auspices of the AU's Development Agency (AUDA-NEPAD). As shall be shown in the fifth section, this initiative appears to have collapsed into the process that ultimately led to the continental strategy. But a closer study of the initiative offers some insight into the approach to AI ethics by policymakers at the continental level. Further considered in this article is Smart Africa's AI Blueprint, another continental initiative introduced in 2021. By closely examining these continental initiatives, I seek to locate any emerging continental approach to AI ethics, including a unique "African AI ethics", that draws up or incorporates the much-touted Ubuntu.

National AI strategies—also referred to as AI policies—are policy instruments that lay out the policy direction, priorities and goals of national governments in harnessing the benefits as well as mitigating the risks, including ethical risks, of AI (Radu, 2021: 184–185). Where the strategy is continental adopted, for example by the AU, the objective would also be to create a harmonised approach to AI across member states. That would also mean that the structure of a typical national AI strategy or policy would include—in many cases—a section or chapter where it addresses AI ethics, alongside other AI governance themes. That makes AI strategies vital sources of locating local or indigenous AI ethics principles or perspectives.

The critique of "western" AI ethics in a nutshell

With the unprecedented increase in AI research, development and deployment, there is a palpable sense of urgency to put in place frameworks of governance at various levels. This is reflected in the proliferation of AI ethics initiatives authored by various actors in recent years. But many of these initiatives are advanced by actors from parts of the globe traditionally subsumed under the label "Global North" which consists primarily of countries in the western world. None of the recent comprehensive surveys have identified AI ethics initiatives from actors in Africa (Corrêa et al., 2023: 6). This has generated in the literature what I call here a "critique of western AI ethics". This section aims solely to provide a brief overview of this critique as a background to the subsequent analysis, not to demonstrate the critique's validity.

At the centre of the critique is the dearth of non-western values and epistemic systems in current AI ethics. This concern applies not only to the ways in which AI technologies are designed, developed and deployed but also in the way that they are governed through ethical principles. Because much of AI research and development is taking place in the west by western developers, little heed is paid to ethical values in the Global South, including African values (Hassan, 2023: 1439). AI technologies are designed and governed, the argument goes, on the basis of values prized in western societies such as individual autonomy (Mhlambi & Tiribelli, 2023: 867–872). Scholars argue that visions of current AI ethics do not embrace accounts of ethics found in non-western cultures, including Africa (Eke et al., 2023: 6). This omission of African values and epistemic systems in AI ethics discourse has been described as an "epistemic injustice" (Segun, 2021: 99).

Coined by Fricker, epistemic injustice has two dimensions: testimonial and hermeneutical injustices. Testimonial injustice is a form of epistemic injustice where the knowledge of a particular knower or speaker is discounted or treated with less credibility due to their status or identity (Fricker, 2007: 9–14). This relates to the intellectual weight attached to the epistemic contributions, authority or value of particular sections of society in the broader system of knowledge production. In the AI context, the neglect of non-western value and knowledge systems in the development of AI systems as well as normative governance structures can be taken as a form of testimonial epistemic injustice (Nihei, 2022: 42). This is precisely because the exclusion is on account of the identity of the author/speaker or the source of the ethical or knowledge system, i.e. being an African or being sourced from Africa, rather than the merit or juridical quality of the ethical, value or knowledge system in question. It is this form of epistemic injustice that is at the centre of the critique of western AI ethics, and hence the primary concern in this article.

Hermeneutical injustice, on the other hand, is an epistemological injustice that flows from structural and systemic barriers to interpretive resources that would limit the contribution of social groups in the chain of knowledge production (Fricker, 2007: 147–153). At its core, this type of epistemic injustice concerns the barriers to both the creation and the application of knowledge where it matters. Barriers to participation in global AI discussions perhaps best captures hermeneutical injustice in AI ethics. Ruttkamp-Bloem, for instance, characterises the exclusion of African academics and practitioners from global AI debates as a form of epistemic injustice (Ruttkamp-Bloem, 2023: 14, 18). But this would rather be testimonial injustice where the identity of stakeholders is the underlying driver of the exclusion. Hermeneutical injustice is a widely recognised challenge in AI governance (ÓhÉigeartaigh et al., 2020: 575–576, 588), but it is not the focus in this article.

Returning to the critique, the concern is that perpetration of epistemic injustice in the AI domain would lead to grave consequences. Scholars increasingly warn that epistemic injustice might lead to the "digital colonisation" of the continent (Kiemde & Kora, 2022: 35–36; Mohammed et al., 2020). Also dubbed "ethical colonialism", such a form of colonisation follows an exclusive focus on the Anglo-European moral framework that puts rational individuals at the centre (Piedra, 2023: 472). The net effect of such a form of epistemic injustice is that it would lead to a state where AI technologies are developed in a manner that perpetuates the marginalisation of users from the Global South, including Africa.

From an African context, scholars often invoke the potential of Ubuntu—a relational account of ethics widely discussed under the rubric of "African philosophy" or ethics—in addressing the epistemic injustice of current AI ethics. And to a degree, this has been heeded. For instance, an aspect of Ubuntu—as shall be discussed later—is codified into the United Nations Educational, Scientific and Cultural Organisation's (UNESCO) Recommendation on AI ethics. But the question of how, and to what extent, Ubuntu contributes towards addressing the widely accepted epistemic injustice in AI ethics remains. Against the above overview, I now turn to examine that question in the following section.

An African ethics?—Ubuntu and its limits

Forming a central part of the critique of western AI ethics is the recurrent call to embrace a relational ethical approach. Scholars critical of the current AI ethics discourse routinely

point, in this regard, to the virtue of Ubuntu in offering a complimentary relational African ethical perspective. The relational nature of Ubuntu is presented in two forms. One is that under the African ethics of Ubuntu, for an individual to fully become a person, her positive relations with others are fundamental (Metz & Gaie, 2010: 275; Ogude, 2019: 1–2). Personhood is attained through interpersonal and communal relations, rather than individualist, rational and atomistic endeavours (Ikuenobe, 2015: 1007). Ubuntu places considerable weight on the role of society in shaping individual identity and defining personhood. That makes Ubuntu a communitarian ethos.

This stands in stark contrast with western philosophy where individual autonomy, rationality and prudence are considered crucial for the attainment of the good life or personhood (Wareham, 2021: 129–130). Secondly, Ubuntu's relationality lies in the notion that one has to actively seek harmony with the community to be considered a person or human (Wareham, 2021: 129–130). In contrast, western philosophy emphasises the centrality of mutual respect of rights, among other virtues, for the peaceful coexistence of members of a community (Metz, 2015: 1178–1180). Unlike Ubuntu, this is passive where one's personhood will not hinge on her actively seeking social harmony but on the ability to lead her actions or life in accordance with accepted standards. In that sense, western ethical systems are rights-based while Ubuntu tends to be focused more on duties than rights.

Scholars argue that Ubuntu would bring a relational complement to the rationalist foundations of AI ethics which exclusively continues to inform AI development and governance (Birhane, 2021: 1–6; Eke & Ogoh, 2022: 1–3, 6; Mhlambi, 2020: 24–25; Mhlambi & Tiribelli, 2023: 876–877). The argument seems to be that by embracing Ubuntu, AI ethics would move past the epistemic injustice being exacted against African knowledge systems, and by extension, societies. Through "reverse tutelage", indigenous values such as Ubuntu could help remedy the exclusionary and impoverished colonial foundations of AI governance as well as development (Mohammed et al., 2020: 674–677).

To date, the extent to which Ubuntu lives up to such great expectations has not been put to a closer scrutiny. I seek to do precisely that in this section along the following key questions: (a) does Ubuntu have a clear and coherent set of specific normative principles? (b) is Ubuntu conceptually clear enough to meaningfully inform AI development and governance, and (c) does Ubuntu really represent an ethical framework representative of the rather culturally diverse African continent? I address each question in turn in the following paragraphs.

If Ubuntu indeed offers an alternative account of AI ethics, its normative structure applicable to the governance of AI should be amenable to clear and concise enumeration. There has been some effort to unpack the normative content of Ubuntu, namely, to define the specific ethical principles underpinning the concept in the AI context. Gwagwa et al. for instance, highlight that ideals of Ubuntu include values of "solidarity, harmony, hospitality and consensus" (Gwagwa et al., 2022: 2–3). Such descriptions remain generic, however. Importantly, descriptors such as solidarity tend to carry wider meanings on their own thereby frustrating the attempt at unpacking the meaning of Ubuntu.

Perhaps a relatively instructive enunciation of Ubuntu was provided, albeit incidentally, by the African Commission on Human and Peoples' Rights (African Human Rights Commission). In a 2021 Resolution, the African Human Rights Commission—an intergovernmental human rights body in Africa—called upon State Parties to the African Charter on Human and Peoples' Rights to give serious consideration to African "values, norms and ethics" in the formulation of AI governance frameworks with a view to address epistemic injustices (Resolution 473, 2021: Para 2, preamble). It then identifies, in the preamble, the following as components of such indigenous values, norms and ethics: "Ubuntu, communitarian ethos, freedom from domination of one people by another, freedom from racial and other forms of discrimination" (Resolution 473, 2021: Para 19). It is also interesting to note that Ubuntu is described in the footnote of the Resolution's preambular paragraph as "the shared humanity that connects all of us to each other" (Resolution 473, 2021: footnote 3).

Although Ubuntu is not explicitly mentioned, UNESCO's Recommendation embraces values largely similar to those identified by the African Human Rights Commission. One of the Recommendation's sections on "Values" includes "living in peaceful, just and interconnected societies" where it stresses the importance of living in harmony and solidarity, and the fact that humans are interconnected with each other, and with their natural environment (UNESCO Recommendation, 2021: Paras 22–23). Ruttkamp-Bloem, who was a member of the expert group that drafted the Recommendation, notes that this clause was added to incorporate the "African philosophy of Ubuntu and Eastern philosophies such as Buddhism and Taoism" (Ruttkamp-Bloem, 2023: 30).

Indeed, the relevant section of the Recommendation is consistent with descriptions of Ubuntu alluded to above. Given the importance attached to Ubuntu in the AI ethics literature, its inclusion in the Recommendation should not also be surprising. More so because six of the twenty-four members of the ad hoc expert team that drafted the Recommendation were from Africa (Composition of AHEG, 2020). Add to that the more recent Windhoek Statement, issued at the conclusion of the UNESCO Forum on Artificial Intelligence in Southern Africa, which—without specifically mentioning Ubuntu—recommends developing "knowledge

in line with African ethical values" (UNESCO Windhoek Statement, 2022: 3). Taken together, the point I am making here is that Ubuntu is somehow recognised, and to a degree described, in authoritative global and regional instruments of AI ethics as well as in the literature.

Such attempts at unpacking the underlying principles of Ubuntu are commendable but remain problematic. While the African Human Rights Commission's Resolution is—as a soft law—relatively authoritative, its articulation of the concept is not clearly formulated. The Resolution, for instance, identifies "communitarian ethos" as a distinct ethical value alongside Ubuntu while the latter, at its core, is a communitarian value founded on relationality. Add to that the inclusion of freedom from domination and discrimination, which largely are universally shared and legally codified principles and rights, and hence not necessarily unique to Africa (Universal Declaration of Human Rights, 1948: Arts 2–4, 6–7). Principles of autonomy, fairness and non-discrimination too are commonly stipulated in AI ethics guidelines of all types (*Cf* OECD Recommendation, 2019: Para IV). The same observation goes to solidarity and consensus in that there is little evidence to suggest that these are indigenous African values. UNESCO's Recommendation does not do justice either, as it simply stipulates the notion of human interconnectedness with no contextualization. Overall, the foregoing suggests that the specific normative content of Ubuntu is not entirely clear.

This takes us to the second, but related point: whether Ubuntu is conceptually clear enough to apply to the AI context. At the core of the concept is the widely stated adage that a "person is a person through others", not individually as an autonomous being (Letseka, 2012: 48). As a form of relational autonomy, an individual is viewed, under Ubuntu, as socially constituted and embedded in a social environment (Ikuenobe, 2015: 1005–1007). But it is not clear how this generic conception of Ubuntu would translate into an action-guiding principle of AI ethics. It is not straightforward, for example, how a certain AI developer should translate the concept into design to make the technology more socially constituted.

This is not, however, to rule out completely the prospect of values drawn from Africa, including Ubuntu, being embedded into technological design. As the vast literature on value-sensitive design illustrates, technology could very well be designed to reflect certain values in different domains such as healthcare (Umbrello et al., 2021). Indeed, the whole claim of epistemic injustice in AI ethics is a result of particular values, i.e. western values, continuing to inform AI design. But the use of a value sensitive design (VSD) approach is premised on the existence of values whose normative content is clear enough to be embedded into technological design. That is not the case with respect to Ubuntu whose meaning is so generic that it might not be amenable to encoding them into AI designs or governance. Indeed, recent philosophical exercises, including by Jecker et al. and Coeckelbergh, depart from the widely known description of Ubuntu: "a person is a person through others" (Coeckelbergh, 2022: 7–8; Jecker et al., 2022: 5). What this adage would really mean in technological design terms has not been explored. That is where the conceptual challenge of Ubuntu lies.

But more importantly, there are two conceptual problems that further lessen the potential of Ubuntu as an ethical principle of AI. One is that Ubuntu means many different things to different people. For some, it is an ideology or worldview, while it means a doctrine, ethic or philosophy for others (Idoniboye-Obu & Whetho, 2013: 229–230; Matolino & Kwindingwi, 2013: 201). It has also been applied in different contexts differently, including in governance, justice, reconciliation and even business (Idoniboye-Obu & Whetho, 2013: 229–230). That suggests the concept's ambiguity, lacking a coherent whole. The second problem is that the concept of Ubuntu has been evolving over time and space. The now popular description of Ubuntu as "a person is a person through others" emerged only in the early nineties after decades and centuries of conceptual evolution (Idoniboye-Obu & Whetho, 2013: 232). The meaning of Ubuntu also differed spatially with different meanings attached to the concept among the diverse societies of southern Africa (Ogude, 2019: 8). That suggests the concept's protean nature. Such conceptual challenges limit the role of Ubuntu in offering an African ethical perspective of AI.

The broader concern, as Louw rightly points out, however, is applying an ancient concept whose ideals of solidarity, community and caring are least practiced in a continent plagued by conflict and corruption to a modern era (Louw, 2019: 115, 118). Related to this point is that urbanization and westernisation in the continent are bound to erode the influence of Ubuntu where it was practiced for centuries. As Matolino and Kwindingwi rightly argue, the "natural and traditional context" within which Ubuntu existed in the past have since been displaced by "industrialisation and modernity" (Matolino & Kwindingwi, 2013: 203). In a way, this is partly acknowledged by champions of Ubuntu as an alternative or complementary framework of AI ethics. Writing in the context of social robots and the potential of Ubuntu-based robots in facilitating cross-cultural dialogue, Coeckelbergh for instance recognises that Ubuntu is likely to have faded as a major value system in most parts of the continent (Coeckelbergh, 2022: 16). That further undermines the potential of Ubuntu as a suitable principle of AI ethics.

Let us now turn to the third question posed at the outset: is Ubuntu really an African ethics applicable to the whole of the continent which consists of fifty-five culturally diverse countries? What really constitutes an African value or ethics is a deeply debated and unsettled question in the

literature. Scholars have sought to offer a coherent conceptualisation of what is collectively called "African ethics". Metz, a leading scholar of African philosophy, writes that African ethics relates to "certain properties that have been recurrent amongst many Sub-Saharan societies for a long span of time in a way they have tended not to be elsewhere around the globe" (Metz, 2017: 63). According to Metz, the notion of "African ethics" refers to "beliefs about morality found amongst many indigenous black peoples, as opposed to those of Arab descent in the north" (Metz, 2021: 57). This illustrates not only the difficulty, or uncertainty, of delineating which regions of the continent falls within the rubric of African ethics but also that the classification hangs on the rather thin line of "recurrence" of certain practices over a period of time.

By design, Metz's methodology excludes about a dozen north African countries who are members of the AU. It also excludes from its purview less recurrent practices. In his book, Metz expresses frustration in the debate around what makes a particular moral theory "African" (Metz, 2022: 61). He contends that "Africanness" comes in degrees, determined by the extent to which something is informed by features that have been salient in Sub-Saharan thought and practice (Metz, 2022: 61). But this attests to the conceptual uncertainties of who is an "African" and the attendant societal values. That would, in turn, cast doubt on the supposition that Ubuntu is an African ethical value.

Of course, even the staunchest of proponents of Ubuntu as a viable African perspective to AI ethics acknowledge that it is essentially a philosophical and political concept salient exclusively in the southern part of Africa (Gwagwa et al., 2022: 2, 5; Mhlambi, 2020: 12). Yet a closer look suggests that Ubuntu may not be as salient even in southern Africa as its proponents would like us to believe. In the Republic of South Africa for instance, Ubuntu was included in the initial version of the current Constitution during the drafting process, but it was later omitted (Norren, 2023: 117). To be sure, it was mentioned in the prologue to the post-apartheid Interim Constitution (Constitution of South Africa, 1993: Prologue). But Ubuntu is not enshrined in the current constitution of South Africa.

Recent empirical work has also shown that Ubuntu played no significant role during the post-apartheid truth and reconciliation process, nor had the Truth and Reconciliation Commission made a conscious attempt to use it (Gade, 2017: 4). Other commentators even add the rather common xenophobic attacks against other African migrant workers in South Africa to reinforce this point that the ideals of Ubuntu are not quite mainstream as one would hope (Kohnert, 2022: 8; Akinola & Uzodike, 2017: 91). More recently, South Africa led the development of Smart Africa's AI Blueprint, a continental AI initiative considered in the fifth section. But one sees no fragments of Ubuntu in the Blueprint. This also meant national AI strategies that drew significantly from the Blueprint, as shall be highlighted later, make no reference to or embody Ubuntu ethics.

If Ubuntu is an ethics barely entrenched in contemporary southern Africa, how could it be considered an "African ethics" and hence be deployed to inform AI development and governance? This throws further doubt on the claim that Ubuntu is a pan-African ethical system. I argue that one should not also read too much into Ubuntu's inclusion in the UNESCO Recommendation or the Resolution of the African Human Rights Commission. In fact, it might well be said that by uncritically embracing Ubuntu, what the UNESCO Recommendation did is simply co-opt an ethics whose essence in the continent is largely in doubt. Reinforcing this point is that only one of the national strategies surveyed in this study, as shall be shown below, embrace Ubuntu. That further undermines the role of Ubuntu as a potential framework of African AI ethics.

Two conclusions follow from the foregoing. First, the normative contours of Ubuntu as an ethical framework are less clear, and hence difficult to transpose to the AI context. Second, Ubuntu is not as African ethical value as is often presented in the AI ethics literature. That does not, of course, mean there are no ethical values in individual African states or particular regions of the continent. As a culturally and linguistically diverse continent, Africa would certainly have a large repertoire of ethical systems or "moral ideas" relevant to AI governance (Wareham, 2017: 860–864). One feasible way to uncover the existence or otherwise of such country-specific or continental ethical principles is by examining the content of national AI and continental policy instruments. What follows explores whether, and the extent to which, any of the five national AI strategies as well as initiatives for a continental strategy articulate distinctly "African" ethical principles.

Locating "African ethics" in AI policies

Do any of the recent AI related policy instruments in Africa define a niche framework of AI ethics that advances uniquely African ethical systems? In this section, I turn to address this question through an examination of national and continental AI policy instruments adopted in the past few years. In particular, I seek to show whether the AI strategies and policies envision any indigenous ethical values present in specific African countries, broader ethos like Ubuntu, or even any common African position on AI ethics. Accordingly, AI strategies of five African countries (Benin, Egypt, Ghana, Mauritius and Rwanda), and initiatives for a continental AI strategy are examined.

National AI policy instruments

Mauritius is the first African country that adopted a national AI strategy (Mauritius AI Strategy, 2018). In contrast to the other strategies discussed below, a defining feature of this Strategy is that it gives almost exclusive focus to the positive socio-economic benefits of AI rather than the attendant ethical risks. Except for the causal emphasis on the importance of a "clear, explicit and transparent code of ethics" that lays out what can and cannot be done with or by AI, the Strategy does not envisage any ethical framework, nor does it indicate by whom and when the envisioned code would be adopted (Mauritius AI Strategy, 2018: 17).

What is more, the Strategy makes no allusions about an ethics framework that reflects a particular Mauritian, let alone African, ethical perspective. It is also interesting to note that the working group that drafted the Strategy used AI policy initiatives in western countries—mainly OECD member states—as benchmark (Mauritius AI Strategy, 2018: 10–13). This might not be surprising given that no African country had a national AI policy or strategy back in 2018, but it reinforces the point that Mauritius' AI Strategy does not seek to articulate a unique Mauritian or African AI ethics perspective. Importantly, the Strategy does not make any reference to or embody an aspect of Ubuntu.

There is little evidence to suggest that Ubuntu is a widely practiced ethics in Mauritius. A cursory look at the literature reveals little, if not none, works of philosophy or otherwise that relate Ubuntu to Mauritius. One might hypothesize that its omission in the Strategy is a reflection of the fact that Ubuntu is not a major value system in Mauritius. But when one considers the fact that the Strategy envisages no discernible framework of AI ethics, the omission might require further explanation. One such plausible explanation could be that the prism of analysis of the Strategy's authors might have been deeply clouded by the hype around the potential socio-economic benefits of AI, thereby overlooking its multivarious ethical risks.

Egypt is the other African country that launched a national AI strategy (Egypt AI Strategy, 2019). It has, indeed, been at the forefront of AI governance initiatives in Africa more broadly. For instance, it chaired the AU's working group tasked to develop a continental AI strategy, a point considered further below. As highlighted in the preceding section, discussion of "African ethics" in African philosophical literature is often restricted to Sub-Saharan Africa, and hence excluding close to a dozen countries of northern Africa, including Egypt. Ironically, Egypt's national Strategy appears to signal an interest—at least on the part of the government—to lead and coordinate an African perspective on AI ethics and governance. In the Strategy's preface for instance, the Egyptian President expresses the commitment of the government in leading and coordinating African (and Arab) voices within international platforms in line with commonly shared "needs, aspirations, values and principles" (Egypt AI Strategy, 2019: 4, Fourth Pillar of the Strategy at 6, 44). The Strategy even states the goal of Egypt in bridging the gap between developing and developed countries with a view to facilitate international cooperation (Egypt AI Strategy, 2019: 45). But it does not go far enough to outline *what* those commonly shared values and principles are, and whether the aimed cooperation includes intercultural dialogue and cooperation. One point is however clear. If one were to accept the enunciation of "African ethics or philosophy" considered above, Sub-Saharan ethical values such as Ubuntu would not be among the "shared values and principles" alluded to in Egypt's AI Strategy.

Egypt's AI Strategy does not envisage any ethical framework of AI. This reinforces the point made by scholars that AI ethics is given little attention in the policy instruments or discussions preceding the development of national AI strategies in northern Africa more broadly (Stahl et al., 2023: 154). But the lacuna in the Strategy is addressed in a Charter for Responsible AI, a policy instrument already foreshadowed in the AI Strategy, recently adopted to complement the Strategy (Egypt AI Charter, 2023; Egypt AI Strategy, 2019: 71). Among other things, the Charter enumerates a set of ethical guidelines for responsible AI (Egypt AI Charter, 2023: 2–5). However, one of the objectives of the Charter is to provide "Egypt's interpretation of the various guidelines on ethical and responsible AI" such as the UNESCO, OECD and European Union's ethics guidelines (Egypt AI Charter, 2023: 1). Importantly, the Charter states that Egypt is the "first Arab or African country to *adhere* to the OECD Principles on Responsible AI" (Egypt AI Charter, 2023: 2–3).

The Charter identifies five ethical principles that are common in any "western" AI ethics guidelines, namely human-centeredness, accountability, fairness, transparency and explainability, and safety and security (*Cf* OECD Recommendation, 2019, Para IV). As such, one finds no unique Egyptian, let alone African, or Arab for that matter, ethical perspective reflected in the interpretive exercise of the Charter. Of course, this would not come as a surprise when one considers the claim in the Charter that Egypt is the first country to "adhere" to the OECD guidelines. Importantly, it should also be noted that one finds nothing that comes close to Ubuntu in the Strategy despite the supposition that the Strategy "interprets" the UNESCO Recommendation which, as noted above, embraces an aspect of Ubuntu.

As an essentially Sub-Saharan value system, the omission of Ubuntu ethics in Egypt's AI ethics framework might not be surprising. The omission can even be deliberate on the part of the Strategy's authors with a view to emphasise the fact that Ubuntu ethics is not part of Egyptian ethics. This would also solidify the position of scholars like Metz who define, as discussed above, African ethics as Sub-Saharan

ethics. I should however allude to some claims in the literature, albeit fringe, that Ubuntu is not alien to Egypt. Baumann, for instance, suggests that the ancient Egyptian notion of "ma'at" may very well be the predecessor of Ubuntu (Baumann, 2015). This would add another twist in the attempt to explain the omission of Ubuntu in Egypt's AI ethics framework.

Ghana is the first western African nation to introduce a national AI strategy (Ghana AI Strategy, 2022). AI ethics is addressed under Pillar 4 of the Strategy which deals with a broader theme of "data access and governance". But, instead of laying out a niche Ghanian or African ethical framework, the Strategy emphasizes the need to "disseminate guidance on trustworthy, safe, secure and ethical AI practices to AI developers and adopters" (Ghana AI Strategy, 2022: 17, 22, 32). Among international guidelines on AI ethics to be "reviewed and disseminated" are the OECD and UNESCO ethics guidelines (Ghana AI Strategy, 2022: 32–33).

What this would suggest is not only that the authors of the Strategy leave no room for the articulation and then dissemination of a tailored ethical framework, but also that they totally overlook the role of values such as Ubuntu. This is significant when one considers that Ubuntu is reportedly one of the value systems in Ghana (Adjei et al., 2024). This lends weight to the claim that lack of clarity on the normative structures of Ubuntu as well as its lesser prominence in Ghana is perhaps the reason behind its omission in the AI Strategy.

In the section that outlines the methodology, it is provided that the Strategy was informed by African and international best practices on AI (Ghana AI Strategy, 2022: 13). Among African AI policies, Mauritius and Egypt's strategies were adopted by 2022—the year Ghana's strategy was introduced. But as discussed above, both strategies do not envisage a meaningful AI ethics framework, except Egypt's AI Charter which came out later in 2023. That partly explains the omission in Ghana's strategy. But another explanation relates to the strong influence of Smart Africa's AI Blueprint on the AI Strategy (Ghana AI Strategy, 2022: 5–6, 11, 14, 19, 25, 43, 48). Not only is the Blueprint extensively discussed in the Strategy but also that Smart Africa under whose direction the Blueprint was developed was a co-author of Ghana's AI Strategy alongside other stakeholders (Ghana AI Strategy, 2022: Cover page). The Blueprint, as shall be discussed below, does not address AI ethics at all.

Benin is the most recent western African country to introduce a national AI Strategy (Benin AI Strategy, 2023). While the Strategy pays significant attention to the developmental potential of AI, it acknowledges the need to address the "ethical and liability issues" related to AI through adoption of appropriate legislative and regulatory frameworks (Benin AI Strategy, 2023: Strategic Objectives 1–4). There are two points worth highlighting here regarding the Strategy's approach to AI ethics. One is that protection of fundamental human rights, including data protection, appears to be the principal, if not the sole, ethical challenge envisioned in the Strategy (Benin AI Strategy, 2023: 47). But this apparent narrow focus is broadened when the Strategy specifies what the envisaged framework should stipulate. That is the second point worth highlighting. Relevant parts of the Strategy read as follows (Benin AI Strategy, 2023: 35):

> This legislation should, for example, formalise and institute impact analyses and monitoring of AI solutions throughout their lifecycle [...]. Any such monitoring must be instituted to ensure that AI systems are designed and implemented with due consideration for key *concepts such as people, the planet, prosperity, peace, transparency, justice and fairness, accountability, non-maleficence, privacy, benevolence [...] and solidarity.* [Emphasis added]

At one level, the Strategy mentions key principles of AI ethics codified in standard AI ethics guidelines, namely fairness, justice, accountability, non-maleficence and benevolence. But going further, the listed "key concepts" are largely similar to values and ethos often associated with Ubuntu. As discussed above, ideals relating to "people, the planet, peace and solidarity" are subsumed under the concept of Ubuntu by some scholars, the African Human Rights Commission and even the UNESCO Recommendation. While Ubuntu is nowhere mentioned as a source of inspiration for the "key concepts" in the Strategy, empirical work has found the prominence of concepts often discussed under the rubric of Ubuntu in some languages of Benin (Attado, 2023: 76–86). Benin's Strategy, in this respect, differs from the other strategies discussed in this article. Yet the Strategy, just like the UNESCO Recommendation, does not elaborate how the concepts translate into action-guiding norms.

Rwanda is the latest country to adopt a national AI policy (Rwanda AI Policy, 2023). One of the six priority areas identified in the Policy are "Practical Ethical Guidelines" where the government pledges to introduce "widely diffused and operationalized Guidelines on the Ethical Development and Implementation of AI" (Rwanda AI Policy, 2023: 2, 4–5, 18). At the time of writing, the promised guidelines are yet to be launched. But neither the Policy nor the future guidelines appear to have the aim of introducing an "African" AI ethics perspective.

Nor does the Policy refer to or reflect notions related to Ubuntu or any other indigenous ethical systems. A cursory reading of the literature on Ubuntu ethics would suggest that it is prominent in Rwandan communities (de Beer, 2015; Martinon, 2013: Chapter 1). Its omission then may be attributed either to a drafting misstep or to the fact that it is not (any longer) as prominent and widely practiced in the country as projected in the literature. Another plausible

hypothesis could be the concept's generic normative structure and the resultant unsuitability to offer a meaningful framework for the ethical design or governance of AI.

Interestingly, the Policy indicates the government's aim of "shaping responsible AI principles and practices in international platforms" (Rwanda AI Policy, 2023: 5). Among such international platforms are the AU, OECD, UNESCO and Smart Africa. But how Rwanda would "shape" global or regional AI policies is not clear, particularly whether this would be done through a niche Rwandan ethical perspective on AI to be integrated into the anticipated guidelines. Rwanda has reportedly contributed during the development of Smart Africa's AI Blueprint (AI Blueprint, 2021: 4). But as shall be highlighted in the following section, the Blueprint is bereft of any indigenous ethical values, Rwandan or otherwise.

Corollary to the Policy's goal of "shaping" global AI policy is the aim to share "Rwandan perspectives and interests" in international platforms (Rwanda AI Policy, 2023: 5). But this is a rather vague ambition as a country's perspectives and interests may potentially mean anything, including economic interests. Indeed, the Policy's section on "national objective" is largely focused on the opportunities of AI rather than addressing the risks. Moreover, by calling the future AI guidelines "practical", the aim appears to be providing practical guidance rather than defining unique Rwandan ethics of AI. That reduces the prospect of a unique Rwandan, let alone African, AI ethics.

I have so far shown that except for Benin's AI Strategy, none of the national policy instruments surveyed in this study carry or reflect any indigenous ethical framework of AI such as Ubuntu. The tendency seems to be, instead, to use global—and hence essentially "western"—AI ethics frameworks as benchmarks. And in that sense, they do not contribute towards undoing the epistemic injustice in AI ethics. I now proceed to consider to what degree continental initiatives move past such tendencies of national AI strategies.

Continental AI policy instruments

Since 2019, there have been two parallel processes to develop a continental AI strategy in Africa. The first one was launched by the Sharm El Sheikh Declaration where the AU ministers in charge of technology—officially named STC-CICT—established an AI Working Group with a mandate, among other things, to study the "creation of a common African stance on AI based on existing initiatives and in collaboration with African institutions" (Sharm El Sheikh Declaration, 2019: Para 15). But it was not clear at the time whether this would involve developing an AI ethics framework based on established AI ethical values such as Ubuntu, for example. Egypt, who was appointed to chair the Working Group, later disclosed that developing a continental AI strategy would be among the mandates of the Group (Egypt Ministry of Communications and Information Technology, 2019).

What appears to be a disparate process to develop a continental AI Strategy was launched in May 2022 by the African High-level Panel on Emerging Technologies (APET). APET is a 10-member body of experts appointed to advise the AU and member states on how best to harness emerging technologies such as AI for development (APET Terms of Reference, 2016). With the adoption of a continental AI strategy by the Executive Council of the AU in July 2024, it appears that this process seems to have either stalled or has been subsumed under the process initiated by the Sharm El Sheikh Declaration. This should not of course come as a surprise given that APET, and its secretariat AUDA-NEPAD, are parts of the AU structure. But a look at some of the work of the APET-led initiative offers instructive insights on the overall continental approach to AI ethics.

In a 2021 report, the APET Secretariat recommended the establishment of a continental African Institute for AI which, among other things, would "establish guidelines and principles for AI development in Africa" (APET, 2021: 65). But this does not offer much detail, for example on what basis the guidelines will be established. Importantly, no reference is made to incorporating indigenous African values or ethical systems such as Ubuntu in the principles and guidelines. A report published two years later takes a step further when it highlights the need to base AI ethics on "African values" (APET, 2023). Yet, by failing to elaborate what counts as African values or ethics, this report harks back to the question considered above, i.e. what really falls under the rubric of African values? It is not hence clear whether Ubuntu is really an "African" value.

In early 2024, APET launched a white paper that would provide the basis for the continental AI strategy (AUDA-NEPAD White Paper, 2024). But the white paper sends a mixed signal on the ways in which AI ethics should be addressed. At one level, it highlights the need to "advance African value systems and principles in AI ethics" (AUDA-NEPAD White Paper, 2024: 153). Additionally, under a caption "defining African AI ethics", APET recommends "collaboratively establishing unified legal systems that clearly define AI ethics" (AUDA-NEPAD White Paper, 2024: 109). Taken together, APET appears to acknowledge the need to define African ethics for AI and advance them at regional and global levels. But APET's other recommendation tends to go in the opposite direction by calling upon AU member states to "domesticate" the UNESCO Recommendation into national policy or legislation (AUDA-NEPAD White Paper, 2024: 109). Unless one were to assume that the UNESCO guidelines embody "African ethics" which is not necessarily the case—the vague inclusion of Ubuntu notwithstanding

(discussed in the fourth section), the call for domesticating them contradicts the call to define African ethics.

In a dramatic turn of events, the Executive Council of the AU, which is a body consisting of foreign ministers of member states (AU Constitutive Act, 2000: Article 10), adopted a continental AI Strategy in July 2024. This Strategy traces back its origin to the process launched by the Sharm El Sheik Declaration, thereby appearing to exclude the role of APET (AU Continental AI Strategy, 2024: 16). But not only does it state that the Strategy is informed by previous initiatives but also AUDA-NEPAD was part of the taskforce of experts that provided guidance and support during the development of the Strategy (AU Continental AI Strategy, 2024: 2, 16). This is worth pointing out because, as I shall discuss below, aspects of APET's white paper that contemplate defining African AI ethics are not reflected in the Strategy adopted by the AU Executive Council. In that sense, the Strategy walks back that goal of defining African AI ethics.

In discussing risks posed by AI, the Strategy speaks of risks to "African and pan-African values" (AU Continental AI Strategy, 2024: 25–26). One of the strategic objectives to be achieved by 2030 is the development of AI ethics guidelines that are adapted to the African context (AU Continental AI Strategy, 2024: 28–29, 35). This might be taken to mean ethical guidelines that draw upon and are informed by indigenous ethics and values. That would still be a far cry from the task of "defining African ethics" as envisioned in APET's whitepaper. If looked at closely, drawing upon African cultures and ethics in the development of the ethical guidelines does not seem to be the explicit aim.

It is highlighted in the Strategy that the proposed AI ethics guidelines should "respect", among other things, "African culture and values" (AU Continental AI Strategy, 2024: 29). Furthermore, in the preliminary pages where specific areas of action are outlined, the Strategy provides that the proposed AI ethics guidelines should "respect", among other things, "values such as Ubuntu, which respects collective community over individuality" (AU Continental AI Strategy, 2024: 4–5). This raises the question of what respecting, for example, Ubuntu would mean in practical terms. Does it mean that the guidelines should incorporate the ideals of Ubuntu—which the Strategy vaguely describes as a value that prizes collective community over individuality? Or that the guidelines should not embody principles that prize individuality over community?

Semantically, the word "respect" signifies restraint and hence excluding positive steps towards a particular phenomenon. That could lend weight to an argument that the Strategy not only avoids defining a niche ethics of AI for the continent but also that the focus, as alluded to above, appears to be addressing risks of AI to African values and cultures. The Strategy appears to view AI as a threat to African values, rather than using these values in defining the ethics of AI.

By failing to offer clarity on the ways in which AI ethics should be viewed and defined in the African context, the Strategy contributes little in articulating a common African position or perspective on AI ethics. One should also consider the casual way in which the much-touted African ethics of Ubuntu is mentioned in the Strategy. In so doing, the Strategy postpones or avoids the task of clearly defining what African ethics of AI would be like, and the place that widely discussed ideals such as Ubuntu should assume in the process.

One of the recommendations in the Strategy is strengthening Africa's participation in global AI governance (AU Continental AI Strategy, 2024: 58). But again, it notes that African experts are the center of global discussions on AI. The suggestion appears to be that while Africans do participate in global AI governance platforms, they rarely raise African voices. But this complaint assumes that there is a common "African voice" or position, including on building and governing AI based on values prominent in the continent. From an ethical perspective, the Strategy essentially entrenches the absence of African voices by failing to articulative such a voice on AI ethics.

Before closing this section, it is worth flagging another continental Al governance initiative: the AI for Africa Blueprint. Funded by the government of Germany and led by the Republic of South Africa, the Blueprint was developed by a working group consisting of members drawn from various sectors in Africa (AI Blueprint, 2021: 14). The stated objective of the Blueprint is to facilitate a common African position on AI by providing a template for the development of national AI strategies by African governments (AI Blueprint, 2021: 23–25).

Except for the emphasis on stipulating an AI ethical framework in national strategies—and a recommendation to install a regional AI policy body, the Blueprint does not articulate ethical principles that convey a common African position on AI ethics (AI Blueprint, 2021: 17, 44). Neither do national strategies discussed above explicitly acknowledge using the Blueprint as a template. Of course, Ghana's AI Strategy—as highlighted above—appears to have drawn extensively from the Blueprint. Perhaps due to this influence, the Strategy pays little attention to AI ethics, let alone articulate a niche framework of AI ethics informed by indigenous ethical systems.

Overall, neither the national or regional policy instruments introduced in the past few years offer a clear, coherent and common African position of AI ethics. Nor do they engage with ethical systems such as Ubuntu in a manner that unpacks their normative content so that they would provide an alternative or even complementary framework of AI ethics. This raises the question of whether this state of affairs is because of the difficulty in distilling a common ethical perspective or the absence of ethical systems that are widely

shared in the continent. Or, does it have anything to do with the composition of working groups and committees tasked to draft AI policies? To be sure, the drafting of national AI policies surveyed in this study were led mainly by government ministries in charge of digital affairs. This was the case for national AI strategies of Benin, Ghana and Rwanda (Benin AI Strategy, 2023: 2; Ghana AI Strategy, 2022: 9; Rwanda AI Policy, 2023: 1). With respect to Mauritius, the drafting was even undertaken by high-level officials (Mauritius AI Strategy, 2018: 2).

The concern with this approach to the development of AI governance instruments is that ethics might not find meaningful attention. Drafting teams made up of multidisciplinary experts, including those with background in ethics, are more likely to give some attention to ethical aspects of AI. That may partly explain the little attention paid to AI ethics in AI strategies in Africa. But one would be hard-pressed to ask whether the task of defining African ethics should be the next phase of the recent drive in the continent of introducing the first generation of AI governance initiatives. I conclude the article in what follows with a tentative answer to this question.

Conclusion: towards defining African AI ethics?

A growing body of AI ethics scholarship decries the exclusion of African epistemologies and ethical systems. To reverse this "epistemic injustice", the role of Ubuntu as a complementary ethical framework has been given considerable attention. But the extent to which Ubuntu offers a viable complimentary framework of AI ethics has not been interrogated. Neither has the role of emerging AI policy instruments in articulating an African ethical perspective been explored in the AI governance literature. Seeking to fill this void, I examined the extent to which Ubuntu, and AI strategies in Africa articulate an African perspective of AI ethics, and hence address the epistemic injustice in AI ethics. I demonstrated that neither the normative structure of Ubuntu nor recent AI strategies offer a clear, coherent and practicable framework of "African AI ethics". I further showed that except for Benin's AI Strategy, the much-touted "African" ethics of Ubuntu is not referenced or implied in the other national or continental AI governance initiatives. What is more, Ubuntu's indirect reference in Benin's AI Strategy as well as the rather universal UNESCO Recommendation does not shed any light on its vague normative and conceptual structure.

The UNESCO Recommendation is likely to further influence future AI ethics frameworks in Africa, with Morocco being the latest country to declare "implementing" the Recommendation (MAP News, 2023). This should also be seen against the background fact that forty-six African states had endorsed the UNESCO Recommendation (State of AI in Africa Report, 2023: 21). But the sheer incorporation of Ubuntu in such instruments without clarity on what "African ethics", including Ubuntu, involves would not address the sharp criticisms of current "western" AI ethics. This, therefore, calls for a process towards defining not only the underlying principles of African ethics, including Ubuntu, but also how they apply in the development and governance of AI.

Albeit in a broader context, AU's Cybersecurity Expert Group quipped that "as Africans, we need to articulate our own philosophy, ethics […] on AI" (AU Press Release, 2019). This is consistent with the point made in APET's white paper, alluded to above. While the continental AI Strategy was the most pertinent instrument to define AI ethics from an African perspective, that should be the next phase of not only in the work of policymakers but also the AI ethics scholarship in Africa and beyond. Further studies that unpack the ways in which African ethics may be specified into action-guiding norms is urgently needed.

The African Human Rights Commission, in the Resolution discussed above, "committed" back in 2021 to install an expert body that would study the implications of emerging technologies such as AI with the ultimate goal of developing "guidelines and norms" (Resolution 473, 2021: Para 7). The draft of the study has since been presented at a validation workshop in May 2024 and at a quasi-public consultation between September and October 2024 (African Human Rights Commission Press Release, September 2024).

While this article was being readied for publication in mid-April 2025, the draft report was published for public input (Draft Study on AI and Robotics of the African Human Rights Commission, 2025). This heavily descriptive report dedicates just a couple of pages to consider the role of ethics in the governance of AI (Draft Study on AI and Robotics of the African Human Rights Commission, 2025: 110–115). But much is left wanting. Relevant parts of the report read:

> [I]t becomes imperative *for African stakeholders to assess and incorporate values that are distinctive to African communities*, which may not necessarily align with global initiatives on AI ethics. […] In the context of AI, it is therefore important for *African states to consider the morals and traditional values of communities that may be impacted by AI*. In essence, designing AI for Africans necessitates the proactive integration of African values and principles into both its design and implementation. The initial step in this process is *to normatively identify and understand which values and principles should be embedded in AI systems*. Africa boasts rich moral traditions centred around core values of interconnectedness, solidarity, communality, and respect, all of which *are encapsu-*

lated in ethical frameworks like Ubuntu. [Emphasis Added]

An important takeaway from this passage is that the expert body appears to delegate to others, namely African states and stakeholders, the task of first identifying and then incorporating distinctive African values into AI design and development. While the report tends to recognise plurality of African ethical and value systems, it postpones to the future the task of identifying them. Ubuntu is casually mentioned as one that encapsulates widely shared values and principles in the continent, but it is barely explored. What is more striking is that the report seems to address the call for embedding African values in AI design to "African stakeholders". If the latter refers to AI companies, it clearly excludes AI companies based outside Africa but who are routinely accused of exacting the epistemic injustice in AI ethics. One would hope that such studies by a continental authoritative body like the African Human Rights Commission might bring some conceptual clarity on African ethical systems, including Ubuntu. And that might gradually contribute towards addressing the problem of epistemic injustice in AI ethics. But the draft report dashes this hope, unless public input—which could be submitted only during the short one-month window—somehow directs the expert body to change course.

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