
ARTIFICIAL INTELLIGENCE AND THE FUTURE OF INTERNATIONAL ARBITRATION: THE RISE OF THE 'DIGITAL ARBITRATOR'

Mr. Arnav Mishra, BBA LLB (Hons.), School of Law, Christ University, Lavasa campus,
Pune, Maharashtra

ABSTRACT

The history of development of artificial intelligence has actually transformed AI into a force and almost an unstoppable force in most areas of the law. However, it is very different in the field of domestic commerce arbitration. A number of arbitration agencies have become digital and are presently applying AI to most of their activities that include automated document reviews, predictive analysis of rewards, and systems to manage cases that are enhanced with AI. The shift towards the process of adjusting arbitration to AI has been identified as a way of carrying on with the practice of technological shifts. However, despite the easiness of the conception of an arbitral proceeding through the assistance of artificial intelligence, the association of an autonomous digital arbitrator fully or partly, has brought into question the validity of awards, due process, responsibility, and motivation of such awards by the digital arbitrator. Although the individuals driving it may claim that artificial intelligence arbitration is a legitimate trend and it will probably be objective, less biased, and more efficient, it is necessary because of the absence of legal rationale, feelings, and morality that one is left wondering whether it is an effective autonomous arbitrator.

This paper critically examines these arguments, and it talks about the current usage of artificial intelligence in international arbitral practice, showcasing how the present practice of using artificial intelligence is assistive and not independent. The next part of the paper talks about the concept of the "digital arbitrator", its feasibility and the implications that this concept might have, specially focusing on how the principles of natural justice can be harmed, the transparency, accuracy, fairness of the arbitrator. This research analyses the gaps in the regulatory frameworks relating to the use of artificial intelligence in international arbitration, such as the New York Convention. This paper proposes a framework based on obligations of transparency: "human in the loop requirements" and an institution for keeping an oversight and a standard set for accountability of awards given by the AI.

The paper concludes that artificial intelligence can perhaps be involved in the arbitral proceedings, but a digital arbitrator cannot be a proper one because of the current existing structures. The digital arbitrator will not replace arbitration in the future, however, but represent a combination of the two artificial intelligence and human in such a manner that the human judgement that is the key element is not compromised.

Introduction

The international arbitration is one of the most discussed topics of the recent past and it has been referred to as an area that is highly accommodative and open to adopt new technology and evolve. The arbitration profession has remained stubbornly entrenched as one of procedural innovation and technological use.

It had begun with the application of the virtual conferencing, online documentation, and online portals that were created with references to the case management. The change in technology has been quite rapid in the past few years because of the proliferation of technological advances achieved in the field of artificial intelligence, and is already directly involved in processing evidence, of a strategy formulation carried out on its behalf.

This rapid rate of technological advancement in arbitration has resulted to the need to rethink whether it is traditional or not. The issue of whether the traditional or entirely new system should exist has been brought into the light of the changes in the sphere of the arbitration that resulted in the independence of the sides, secrecy, and objectivity of the arbiter.

Post the Covid-19 pandemic, arbitral institutions such as the ICC(International Chamber of Commerce), LCIA (London Court of International Arbitration), SIAC (Singapore International Arbitration Centre), ICDR (International Centre for Dispute Resolution) and PCA (Permanent Court of Arbitration) increased their online services, while institutions such as ICCA (International Council for Commercial Arbitration) and CIArb (Chartered Institute of Arbitrators) issued guidelines emphasizing the responsible utilisation of technological tools¹. The inclusion of Artificial Intelligence in legal systems varying from machine learning assisted document review (TAR 2.0), natural language processing systems, automatic translation engines, outcome prediction algorithms being used by counsels has made it possible to consider

¹ Kim M. Rooney, *The Global Impact of the Covid-19 Pandemic on Commercial Dispute Resolution in the First Year*, Int'l Bar Ass'n (June 2, 2021), <https://www.ibanet.org/global-impact-covid-19-pandemic-dispute-resolution>

the broader consequences of adopting a.i.² Now the possibility of A.I systems replacing or helping human arbitrators which was once considered as a speculation has now become a subject of scholarly debates. The evolution of digital arbitrators' concept which is basically an artificial intelligence system competent of assessing the evidence, that can apply legal principles and reasoning and deliver binding awards. The supporters of this concept showcases the potential benefits such as reduced costs, faster timelines, standard reasoning, reduced chances of human bias and more accessible justice³. Further, the technicalities of the arbitration are consensual, private, party-oriented and needs-oriented. The arbitration technicalities that can be elaborated are consensual, private, party and needs oriented.

The fact that it can be imposed without necessarily going to the courts makes it a very lucrative facet to investigate AI arbitrator. To the extent that they can be imposed without involving the courts, it makes it a highly fruitful area to discover the AI arbitrator.

The New York convention makes the issue even easier as it is supportive to the implementation of awards and not strict regarding its. The New York convention also makes the matter very simple as it is quite accommodative to the implementation of the awards and not rigid in its implementation. Whereas it may be allowed in the convention, it is highly challenging to apply a digital arbitrator since arbitration is not only. Although the convention may permit it, a digital arbitrator is extremely problematic in an arbitration process since it is not the only one. On imposing legal regulations and principles, which, however, is a delicate matter concerning the cultures, does require human judgment. Although it deals with application of legal rules and principles, which are however culture sensitive, arbitration does not exclude the use of human judgment.

It should be fair, should be of good faith and should treat the parties equally which will not be easy in the case of artificial intelligence. An AI can hardly achieve the things that constitute justice, good faith, and equal treatment of all parties when it comes to artificial intelligence.

Transparency, impartiality, and accountability of the arbitrator are the only way arbitration can be legitimate, these are the values which cannot be served by the black box supported artificial intelligence systems. It is only by transparency, impartiality, and accountability of the arbitrator

² Maura R. Grossman & Gordon V. Cormack, *Technology-Assisted Review in E-Discovery Can Be More Effective and More Efficient Than Exhaustive Manual Review*, 17 Rich. J.L. & Tech. 11 (2011)

³ Nadia Nicolaou, *The Evolution of Arbitration Technology: AI Use Cases and Considerations*, Lexology (June 12, 2025), <https://www.lexology.com/library/detail.aspx?g=d77a9611-fe0a-41ec-a5d6-5c7b32951f57>

that arbitration can be legitimate; these are the values that have no support in black box-supported AI systems.

The absence of clear and logical reasoning by the artificial intelligence systems when included with the chance of bias because of the coding and programming of the artificial intelligence system as artificial intelligence systems learn from datasets so it creates a huge risk that arbitral awards declared by the digital arbitrator cannot be reviewed or challenged. Giving the whole power of decision making to systems that are not humans will also lead to violation of basic principles of law such as basic fairness that are encompassed in the Model Law ⁴and the different individual laws governing arbitration in different countries. So this paper proposes to clearly interpret and define this ambiguous area by examining how Artificial Intelligence systems are being used in different jurisdictions for arbitration cases and then examine whether a digital arbitrator is capable of performing arbitration and is acceptable by the international arbitral institutions and thereafter suggesting a dynamic set of rules designed so as to ensure an equilibrium balancing both artificial intelligence and the need for trust. The main purpose of this paper is to show that Artificial Intelligence has already become a huge part of solving arbitral problems but the central question is if it should ever take over the human's role of giving the final award. There is a strong need to clearly figure out the domains of arbitration where rules are not clear and analyse how to use artificial intelligence in a more official ethical manner. It is very important to note that artificial intelligence will become a critical part of the process of arbitral dispute solving in the future but with the present framework a complete digital arbitrator does not comply for international legal arbitration.

1. Artificial intelligence in current Arbitral Practice

International commercial arbitration has always been adaptable and prioritises the need of the parties involved in the arbitral disputes that has always allowed the arbitral process to adapt to new technological developments way before normal national courts. Thus the initiation of use of artificial intelligence in international commercial arbitration is just carrying on the tradition of adaptation of new technologies rather than a complete change at once.

Today Artificial intelligence is primarily used in 3 important tasks that are -

⁴ UNCITRAL Model Law on Int'l Com. Arb., G.A. Res. 40/72, U.N. GAOR, 40th Sess., Supp. No. 53, at 308, U.N. Doc. A/40/53 (Dec. 11, 1985), as amended by G.A. Res. 61/33, U.N. Doc. A/RES/61/33 (Dec. 4, 2006).

- 1) handling of evidence and in analysing the legal documents
- 2) Conduct of legal research and prediction of results of the case
- 3) Assisting the tribunal by speeding up the administrative and drafting work

Artificial intelligence surely helps in fastening up the process and makes it more efficient but it should always remain an assisting tool performing under the control of a human arbitrator that finally makes the final decision.

1.1 Use of Artificial intelligence in reviewing of documents and management of evidence⁵-

The most effective and most accepted use of Artificial Intelligence in international commercial arbitration is TAR, i.e Technology-Assisted- Review. This artificial intelligence system uses machine learning algorithms to evaluate the documents, analyse the ones which are relevant to the case and finalise the order in which their review should take place. Advanced TAR algorithms, called TAR 2.0 have the potential to learn from the response of the human arbitrators and improve continuously in how precisely the artificial intelligence algorithms classify the presented documents. In huge commercial disputes such as disputes arising out of construction disputes, projects related to energy manufacturing, disputations between investors and governments, disputes between governments, in these the evidence can easily go up to millions of pages. In such cases human reviewers and arbitration panels would take months to go through the evidence presented which can be done in a few hours by artificial intelligence algorithms and is very financially viable leading to making the evidence review process easier. The process of using these artificial intelligence tools effectively and ethically has been supported by the guidelines issues by several arbitral institutions such as the ICC (International Chamber of Commerce)⁶ and CI Arb (Chartered Institute of Arbitrators)⁷. artificial intelligence tools such as NLP(Natural Language Processing) can recognise the important people or parties involved in the dispute, generate comprehensive timelines and find important patterns in the

⁵ Bhavana Chandak Dhoundiyal & Shambhavi Upadhyay, Embracing AI in Arbitration: Enhancing Efficiency Without Compromising Justice, SCC Times (Sept. 5, 2025), <https://www.sconline.com/blog/post/2025/09/05/embracing-ai-in-arbitration-enhancing-efficiency-without-compromising-justice/>

⁶ Int'l Chamber of Com., Overarching Narrative on Artificial Intelligence (2024), <https://iccwbo.org/global-insights/digital-economy/icc-overarching-narrative-on-artificial-intelligence/>

⁷ Chartered Inst. of Arbitrators, *Guideline on the Use of Artificial Intelligence in Arbitration* (2024), <https://www.ciarb.org/resources/guidelines/guideline-on-the-use-of-artificial-intelligence-in-arbitration/>

dispute resolution process.

The arbitral institutions use artificial intelligence in several other ways such as assisting with audio to text transcription and videos to texts translations, translating documents to several languages, taking out the most important and crucial information from hidden data (meta data), deleting duplicate data and arranging related documents together. This allows the counsels to prepare arguments more effectively and efficiently. Even though these tools help automate and speed up the process of evidence collection and gathering they are not capable of handling the decision making of how reliable and true an evidence actually is.

1.2 Use of artificial intelligence in legal research and forecasting case analysis -

In recent times, we have seen the rise of several artificial intelligence algorithms that can go through enormous databases of past arbitral disputes to analyse the patterns in past awards and predict what is likely to happen in a similar dispute by comparing them to the arbitral precedents. These Artificial algorithms have been cleverly employed in arbitral process so as to achieve goals such as

- A) predicting the outcome of a dispute
- B) Calculating the estimated compensation or financial Damages
- C) Analysing what all risks can occur during the procedural process of a dispute resolution
- D) They help counsels to construct their strategy by analysing precedents.

The primary purpose of these systems remains advisory to the arbitration panels and not an autonomous arbitrator role.

1.3 Artificial intelligence assisted drafting and support to arbitration tribunals-

Artificial Intelligence tools have constantly assisted the human arbitrators by drafting lengthy awards, drafting of procedural instructions, compiling huge amounts of evidence, outlining a timeline of events as they occurred and drafting of drafts wherever required during the arbitral process. These automatic drafting does not determine the final outcome or interpretation of legal problems, but it does provide a structure for how a human arbitration panel organizes and conveys its reasoning. Institutions governing and performing arbitrations such as ICDR

(International Centre for Dispute Resolution) and SIAC (Singapore International Arbitration Centre) have started introducing Artificial Intelligence algorithms for monitoring the cases in their institutions and several individual human arbitrators also informally use Artificial Intelligence algorithms to generate texts and use them to track regular administrative proceedings.⁸

In spite of all these benefits it is important to recognise that artificial intelligence has no power to make final decisions. Human arbitrators still maintain full control over all decisions in the whole process of arbitration, analysing the reliability of witnesses and assessing the law. So the current use of artificial intelligence is to improve the process and not replace human arbitrators.

2. The idea of a Digital Arbitrator

2.1 The idea of a digital arbitrator for now is a completely theoretical concept, it is a system that could hear a dispute, analyse evidence, understand legal rules and pass a final and binding award after examining all evidences and listening to arguments of both the sides, which is a dynamic change from the use of Artificial Intelligence in current practice⁹. In the current situation the use of artificial intelligence in international commercial arbitration is just to assist the human arbitrators and speed up the procedure by automation of some steps such as evidence collection, translation, creating transcripts etc. On the other hand this idea of a completely new digital arbitrator would replace the existing human arbitrators that have traditionally held the role and have been proficient in legal training, real life experience and the critical thinking ability.

The main problem is not whether Artificial Intelligence can review complicated facts or apply rules of a contract. The main issue is if an artificial digital arbitrator has the necessary skill set, legitimacy and ability to act as an independent arbitrator while being fair, reasonable, transparent and performing proper legal process. This discussion has grown rapidly because of the growth of Artificial Intelligence in the real world across domains as several machine learning algorithms and networks like the deep neural networks have gotten better at recognising patterns and producing decisions based on a variety of datasets. Some supporters

⁸ Leon Alexander & Hannah Chua, AI in Arbitration – A Perspective from Singapore (Sept. 5, 2025), Clyde & Co, <https://www.clydeco.com/en/insights/2025/09/ai-in-arbitration-a-perspective-from-singapore>

⁹ Gabrielle Kaufmann-Kohler & Thomas Schultz, The Use of Information Technology in Arbitration (Dec. 5, 2005), <https://www.lk-k.com/wp-content/uploads/The-Use-of-Information-Technology-in-Arbitration.pdf>

of this concept argue that arbitration is a private process used by parties to dissolve their disputes so it is a perfect platform for experimenting with automated decision making, they believe that if parties can agree on a single arbitrator be it a legal professional or not then why can't they agree on using an artificial intelligence model as an algorithm. The critics on the other side argue that artificial intelligence systems cannot perform arbitration as it requires the fundamental principles of arbitration such as - the arbitrators must use their critical thinking to determine and pass decisions, explain their reasoning behind passing such awards and be held accountable all of which is impossible for a digital arbitrator as artificial intelligence models are complex and often does not provide reasoning behind their answers.¹⁰

Hence to understand if the concept of digital arbitrator is feasible and practical we must examine if it is-

- A) Technically possible to have a digital arbitrator
- B) It fits with the current arbitral laws and conventions such as the New York Convention
- C) If it will be legitimate and neutral

2.2 How an AI based digital arbitrator would actually work?

A digital arbitrator will need coding and skills surpassing what today's AI systems can perform through their machine learning algorithms.

The least it has to do to be an independent arbitrator is - It should figure out the meaning of a contract and figure out the important clauses of that contract, analyse the laws and current regulations governing arbitration. It should be able to analyse evidence and examine if an evidence is credible or not be it a document or a witness. It has to apply principles of reasonability and proportionality. It would be required to combine and analyse arguments of both the sides and after all this process pass a binding decision while explaining a clear reasoning behind the decision and also has to make sure that the whole process should be just fair and reasonable.

¹⁰ Mark-Silas A. Malekela, AI and Confidentiality Protection in International Commercial Arbitration: Analysis of the Existing Legal Framework, 5 *Discover Artificial Intelligence* 83 (2025), <https://doi.org/10.1007/s44163-025-00316-7>

Even though technological tools like Natural language processing (NLP) are at their effective best, the present AI systems perform their tasks by predicting the most probable outcome which is based on the data it was trained on¹¹. These AI systems just analyse the texts and do not truly understand what the words truly means as in legal interpretations. Further arbitration involves not just reviewing documents and reading them but to understand the facts, the context of the situation, understanding the need of a rule, being aware about the culture of the system and differentiate between what is important and what is irrelevant. The present AI systems cannot comment on humans' testimony and figure out if it is credible or not, the current systems are not effective enough to understand the deliberate moves made by the parties during the resolution process. Therefore the technical feasibility is very limited, as even the best AI systems are not capable of explaining the reasoning behind the decision they made. This is because these systems function through a "black box"- they give a decision without showing what reasoning it followed and in arbitration where a party is required to challenge the decision on a particular ground like flawed process or if the arbitrator exceeded its authority, a clear path of reasoning is a must. As per the New York convention if an arbitrator cannot reason his award it cannot be enforced so that would just mean the decision passed by a digital arbitrator cannot be enforceable.

2.3. Fair procedure, Justice and Audi Alteram partem

This is most probably the biggest hurdle for the digital arbitrator idea as *Audi alteram partem* is the most basic principle before solving any legal dispute which is that all the parties must have an equal opportunity of being heard and present their case before the arbitrator who is neutral and understand their arguments. But the AI algorithms cannot 'hear' the parties, they will only process the data, and won't be able to understand stories, the *mens rea* or the intention behind an act, things which can only be understood by a human arbitrator.¹²

In international commercial arbitration, the following are the essential elements of a fair and just procedure-

¹¹ Supriyono, Aji Prasetya Wibawa, Suyono & Fachrul Kurniawan, Advancements in Natural Language Processing: Implications, Challenges, and Future Directions, Telematics and Informatics Reports 16 (Dec. 2024) 100173, <https://doi.org/10.1016/j.teler.2024.100173>

¹² Nikhil Rao, Artificial Intelligence in International Arbitration: Emerging Challenges and Opportunities, arXiv:2408.11608 [cs.LG] (Aug. 22, 2024), <https://arxiv.org/pdf/2408.11608>

- A. *Audi alteram partem*
- B. Neutral judge
- C. Fully explained Reasoning behind all decisions
- D. Being able to review or challenge a decision

Artificial intelligence algorithms cannot perform any of these functions independently without human support and knowledge as the datasets used to train these algorithms already contain some biases which would be visible in their actions and lead to unfair advantage to one party. This puts the fairness and transparency of the process at risk.

Also AI's decisions are not explained which makes them non enforceable as per the *New York Convention (Article V(1)(b))*¹³ which talks about violations of due process and stress upon its importance.

2.4 The Black Box issue and the requirement of reasoned decisions

In the arbitration process, it is very important that the arbitrator explains the reasoning behind his decision. This is important so as to-

- A. Make sure the decision can be trusted
- B. Making sure that the award passed can be enforceable globally
- C. So as to allow the award to be reviewed under the local law
- D. Be binding on the parties and accepted by parties

AI algorithms are trained on deep learning models which clearly lack transparency, we can only guess what reasoning did they follow and not understand the true reasoning used by the algorithm.¹⁴ A digital arbitrator which cannot explain the reasoning behind its decision cannot

¹³ Convention on the Recognition and Enforcement of Foreign Arbitral Awards art. V(1)(b), June 10, 1958, 330 U.N.T.S. 3.

¹⁴ Lorenzo Belenguer, AI Bias: Exploring Discriminatory Algorithmic Decision-Making Models and the Application of Possible Machine-Centric Solutions Adapted from the Pharmaceutical Industry, 2 AI & Ethics 771 (2022), <https://doi.org/10.1007/s43681-022-00138-8>

give enforceable awards as per *ICC article 32(2)*¹⁵ or *LCIA article 26.2*¹⁶. So even if AI can make decisions in the future it will not be enforceable as under the New York convention.

3. Regulatory challenges and The Way Ahead

The inclusion of AI in international arbitration has showcased a number of concerns regarding the rules and instructions for its use. Even when firms and individual arbitrators are applying AI in their respective works so as to complete the work faster and with more accuracy, it is shocking to note that the basic rules and regulations that look over arbitral processes are not amended to include the usage of AI.¹⁷ This has resulted in a huge problem, specifically in a time where people are talking about AI completely replacing the human arbitrators, i.e., a digital arbitrator.

This part of the paper looks at the hurdles AI has created and it proposes a new framework focusing on the human in loop model.

3.1 No defined rules in the present framework

At present most of the domestic laws and even the international conventions on arbitration have no clause or discussion regarding the ethical usage of AI. The UNCITRAL (United Nations Commission on International Trade Law) model law that is the guiding law for all the arbitral resolution across the globe¹⁸, even this model does not include any specific provisions about AI or its usage. The principles and the wordings used in the model are made for humans such as the “arbitrator” “independent” “reasoned award”.¹⁹ On one side the autonomy of the party can be used as a justification for allowing AI to be an arbitrator but the other side argues about fair and transparent process.

¹⁵ Int'l Chamber of Com., *Rules of Arbitration* art. 32(2) (2021).

¹⁶ London Court of Int'l Arbitration, *LCIA Arbitration Rules* art. 26.2 (2020).

¹⁷ Aarushi Jain, Use of AI in Arbitration: Commentary on the CIArb Guidelines (July 15, 2025), DailyJus, <https://dailyjus.com/legal-tech/2025/07/use-of-ai-in-arbitration-commentary-on-the-ciarb-guidelines>

¹⁸ UNCITRAL, *Model Law on International Commercial Arbitration* (1985), U.N. Doc. A/40/17, 330 U.N.T.S. 38, as amended by *U.N. GA Res. 61/33* (2006)

¹⁹ Angelene LAI & Hwee Hwee Tan, *Reasons in Arbitral Awards: An Analytical Study* (Singapore Management Univ. School of Law Legal Studies Research Paper No. 6609, 2025), https://ink.library.smu.edu.sg/cgi/viewcontent.cgi?params=/context/sol_research/article/6609/&path_info=Reasons_ArbitralAwards_av.pdf

3.2 How are arbitration organisations responding

The big arbitration institutions worldwide have an idea that AI is invading in arbitration but they are also making sure to notice the risks. Therefore these institutions have adopted a slow approach towards AI filled with caution.

The International Chamber of Commerce has been vocal about the importance of technological innovation but also strictly makes sure that the final decision be made by a human.²⁰

Even the *London Court of International Arbitration*²¹ and the *Singapore International Arbitration Centre*²², promote the ethical usage of AI as long as humans are kept in the loop and the final decisions are passed by humans.

3.3 Gaps in responsibility and liability

One major issue is of accountability, in arbitration laws an arbitrator is held accountable for their decisions but AI systems have no legal personality²³. This makes it difficult to determine who is accountable if any decision made by the digital arbitrator is biased or wrong. There is an urgent need for clear rules and guidelines so that institutions might be held accountable for the actions taken by AI that they have approved of.

4. Conclusion

The usage of AI in arbitration is at present one of the biggest concern in the legal system in determining how arbitral disputes are resolved. The inception of artificial intelligence in arbitration was with managing routine tasks and now the debate has led to whether an AI algorithm can replace a human arbitrator and process arbitration independently

The paper states that even though artificial intelligence improves the efficiency of the arbitral process, at present the idea of a digital arbitrator is just a concept that will not be possible in

²⁰ Int'l Chamber of Com., ICC Launches Principles to Support Innovation and Meet Global Challenges (Sept. 10, 2025), <https://iccwbo.org/news-publications/news/icc-launches-principles-to-support-innovation-and-meet-global-challenges/>

²¹ London Court of Int'l Arbitration, LCIA Arbitration Rules (2020), https://www.lcia.org/Dispute_Resolution_Services/lcia-arbitration-rules-2020.aspx

²² Singapore Int'l Arbitration Ctr., SIAC Arbitration Rules (7th ed. 2025), <https://siac.org.sg/siac-rules-2025>

²³ Dong, J., Li, Y., & Zhang, W., Artificial Intelligence in International Commercial Arbitration: Opportunities and Challenges, 6 *Journal of Arbitration and AI Studies* 101050 (2025), <https://doi.org/10.1016/j.saa.2025.1010150>

the near future because of how AI algorithms function. There are also several questions regarding how an independent digital arbitrator can solve legal disputes, ethical and moral issues that need critical thinking, emotions and cannot be resolved just by technical assistance. Presently AI works as an augmentary tool whose whole job is to advise and assist the human arbitrators and nothing else, the functions that it performs are nothing more than basic drafting, legal research and predicting outcomes based on a dataset of precedents²⁴. The concept of a digital arbitrator will be a dynamic shift from the traditional process of arbitration as it gives all the power from a human arbitrator to an AI system. Even from a legal perspective the current conventions are not capable of including a digital judge that passes awards as they clearly state the need for a human arbitrator. To conclude we can say that the real question is not whether arbitration will involve AI or not, it does. The real question remains whether AI can be used ethically while it safeguards the traditional values of arbitration by keeping a human in the loop model.

²⁴ Paul Bennett Marrow, Mansi Karol & Steven Kuyan, *Artificial Intelligence and Arbitration: The Computer as an Arbitrator—Are We There Yet?*, 74 *Disp. Resol. J.* 35 (2020)