

HOLDTALENT

EU AI Act Readiness Checklist

How to use

- **LEGAL (IN FORCE):** Requirement currently applicable under the EU AI Act.
- **LEGAL (FROM 2 AUG 2026):** Requirement that applies from that date (see “Applies:”).
- **GOOD PRACTICE:** Recommended to reduce risk or make compliance easier.
- **Dates:** Application dates are mentioned in Article 113.
- **Tip:** Always check the final legal text and guidance for your sector.

Key official links

- [Official EU AI Act \(Regulation \(EU\) 2024/1689\) - PDF \(EUR-Lex\)](#)
- [AI Act Service Desk - AI Act Explorer \(article-by-article\)](#)

When does it apply?

- **2 Feb 2025:** Chapters I-II: scope/definitions, AI literacy, and prohibited practices.
- **2 Aug 2025:** General-purpose AI model (GPAI) obligations apply.
- **2 Aug 2026:** Most other obligations apply (high-risk, transparency, enforcement).
- **2 Aug 2027:** Some product-safety route obligations (Annex I / Art 6(1)).

Section 1 - Scope, roles, and quick classification (Applies 2 Feb 2025)

Start here: identify whether you are in scope and which role you play.

- ☐ Check whether the AI Act applies to your activity (including extraterritorial reach).

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 2 \(Scope\)](#); [Art 113 \(Dates\)](#)

Notes:

- ☐ Identify your role for each AI system: provider, deployer, importer, distributor, etc.

GOOD PRACTICE

Applies: 2 Feb 2025

Sources: [Art 3 \(Definitions\)](#); [Art 2 \(Scope\)](#)

Notes:

- ☐ If you substantially modify, rebrand, or change the intended purpose of an AI system, check whether you become the "provider" with provider obligations.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 25 \(AI value chain\)](#); [Art 3 \(Definitions\)](#)

Notes:

- ☐ Check whether any system is "high-risk" under the AI Act (Annex III route).

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 6 \(High-risk classification\)](#); [Annex III \(High-risk list\)](#); [Art 113 \(Dates\)](#)

Notes:

Section 2 - AI literacy (Applies 2 Feb 2025)

Baseline duty: make sure the people who use or oversee AI know what they're doing.

Section 2 - AI literacy (Applies 2 Feb 2025) (continued)

Baseline duty: make sure the people who use or oversee AI know what they're doing.

- ☐ Put AI literacy measures in place for staff who operate, deploy, or supervise AI systems (training, guidance, and role-based instructions).

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 4 \(AI literacy\)](#); [Art 113 \(Dates\)](#)

Notes:

Section 3 - Prohibited AI practices (Applies 2 Feb 2025)

If any of these apply, stop and redesign. They are prohibited under Article 5.

- ☐ Do not use subliminal techniques to materially distort a person's behaviour in a way that causes (or is likely to cause) physical or psychological harm.

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 5 \(Prohibited practices\)](#); [Art 113 \(Dates\)](#)

Notes:

- ☐ Do not exploit vulnerabilities of a person due to age, disability, or socio-economic situation, to materially distort behaviour in a way that causes (or is likely to cause) physical or psychological harm.

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 5 \(Prohibited practices\)](#); [Art 113 \(Dates\)](#)

Notes:

- ☐ Do not use AI for social scoring of persons that leads to detrimental or unfavourable treatment in unrelated contexts or that is unjustified or disproportionate.

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 5 \(Prohibited practices\)](#); [Art 113 \(Dates\)](#)

Notes:

Section 3 - Prohibited AI practices (Applies 2 Feb 2025) (continued)

If any of these apply, stop and redesign. They are prohibited under Article 5.



Do not use AI to assess or predict the risk of a person committing a criminal offence based solely on profiling or personality traits (with limited exceptions in the AI Act).

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 5 \(Prohibited practices\)](#); [Art 113 \(Dates\)](#)

Notes:



Do not use AI to infer emotions in workplaces or educational settings, except where strictly necessary for medical or safety reasons under the Act.

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 5 \(Prohibited practices\)](#); [Art 113 \(Dates\)](#)

Notes:



Do not deploy real-time remote biometric identification in publicly accessible spaces for law enforcement purposes, except where allowed under strict conditions.

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 5 \(Prohibited practices\)](#); [Art 113 \(Dates\)](#)

Notes:



Do not use biometric categorisation using sensitive characteristics where Article 5 applies.

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 5 \(Prohibited practices\)](#); [Art 113 \(Dates\)](#)

Notes:



Do not do untargeted scraping of facial images to build or expand facial recognition databases.

LEGAL (IN FORCE)

Applies: 2 Feb 2025

Sources: [Art 5 \(Prohibited practices\)](#); [Art 113 \(Dates\)](#)

Notes:

Section 4 - Transparency duties for certain AI systems (Most apply 2 Aug 2026)

These apply even if the system is not high-risk, if it falls into the categories in Article 50.



Disclose when people are interacting with an AI system (unless obvious).

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 50 \(Transparency\)](#); [Art 113 \(Dates\)](#)

Notes:



Label deepfakes and other AI-generated or manipulated content where required.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 50 \(Transparency\)](#)

Notes:



If you provide emotion recognition or biometric categorisation, provide clear information to users about the system's operation and limitations.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 50 \(Transparency\)](#)

Notes:

Section 5 - If you are a PROVIDER of high-risk AI (Most apply 2 Aug 2026)

This section is mainly for providers of high-risk AI systems.



Set up and maintain a risk management system throughout the lifecycle of the high-risk AI system.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 9 \(Risk management\)](#); [Art 16 \(Provider duties\)](#)

Notes:

Section 5 - If you are a PROVIDER of high-risk AI (Most apply 2 Aug 2026) (continued)

This section is mainly for providers of high-risk AI systems.

- ☐ Put data governance measures in place (training/validation/testing data relevance, quality, and bias monitoring).

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 10 \(Data governance\)](#); [Art 16 \(Provider duties\)](#)

Notes:

- ☐ Create and keep required technical documentation.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 11 \(Technical documentation\)](#); [Art 18 \(Documentation keeping\)](#)

Notes:

- ☐ Put automatic logging and record-keeping in place, where required.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 12 \(Record-keeping\)](#); [Art 19 \(Logs\)](#)

Notes:

- ☐ Provide clear instructions for use and required information to deployers.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 13 \(Information to deployers\)](#); [Art 16 \(Provider duties\)](#)

Notes:

- ☐ Design the system so it can be effectively overseen by humans.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 14 \(Human oversight\)](#); [Art 16 \(Provider duties\)](#)

Notes:

Section 5 - If you are a PROVIDER of high-risk AI (Most apply 2 Aug 2026) (continued)

This section is mainly for providers of high-risk AI systems.

- ☐ Ensure the system meets requirements for accuracy, robustness, and cybersecurity.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 15 \(Accuracy, robustness, cybersecurity\)](#); [Art 16 \(Provider duties\)](#)

Notes:

- ☐ Operate a quality management system covering the required elements.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 17 \(Quality management system\)](#)

Notes:

- ☐ Keep documentation available for the required period and provide it to authorities on request.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 18 \(Documentation keeping\)](#); [Art 21 \(Cooperation with authorities\)](#)

Notes:

- ☐ Take corrective actions and inform authorities where required if the system is not in conformity.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 20 \(Corrective actions\)](#)

Notes:

Section 6 - High-risk AI: conformity assessment, registration, and post-market (Most apply 2 Aug 2026)

This section is mainly for providers of high-risk AI systems.

Section 6 - High-risk AI: conformity assessment, registration, and post-market (Most apply 2 Aug 2026) (continued)

This section is mainly for providers of high-risk AI systems.

- ☐ Complete the required conformity assessment before placing the high-risk AI system on the market or putting it into service.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 43 \(Conformity assessment\)](#)

Notes:

- ☐ Draw up the EU declaration of conformity.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 47 \(EU declaration of conformity\)](#)

Notes:

- ☐ Affix the CE marking as required.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 48 \(CE marking\)](#)

Notes:

- ☐ Register the high-risk AI system in the EU database (where required).

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 49 \(Registration\)](#); [Art 71 \(EU database\)](#)

Notes:

- ☐ Put post-market monitoring in place and maintain a post-market monitoring plan (high-risk AI).

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 72 \(Post-market monitoring\)](#)

Notes:

Section 6 - High-risk AI: conformity assessment, registration, and post-market (Most apply 2 Aug 2026) (continued)

This section is mainly for providers of high-risk AI systems.

- ☐ Report serious incidents and malfunctioning to authorities (where required).

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 73 \(Serious incident reporting\)](#)

Notes:

Section 7 - If you are a DEPLOYER of high-risk AI (Most apply 2 Aug 2026)

A deployer is the person/organisation that uses an AI system under its authority (Art 3).

- ☐ Use the high-risk AI system in accordance with the provider's instructions and ensure human oversight is assigned and effective.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 26 \(Deployer duties\)](#); [Art 14 \(Human oversight\)](#)

Notes:

- ☐ Monitor the operation of the high-risk AI system.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 26 \(Deployer duties\)](#)

Notes:

- ☐ Keep logs automatically generated by the high-risk AI system, where required.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 26 \(Deployer duties\)](#); [Art 19 \(Logs\)](#)

Notes:

Section 7 - If you are a DEPLOYER of high-risk AI (Most apply 2 Aug 2026) (continued)

A deployer is the person/organisation that uses an AI system under its authority (Art 3).

- ☐ Carry out a Fundamental Rights Impact Assessment (FRIA) before using certain high-risk AI systems, where required.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 27 \(FRIA\)](#)

Notes:

- ☐ Provide meaningful explanations to affected persons when decisions are made or assisted by high-risk AI, where required.

LEGAL (FROM 2 AUG 2026)

Applies: 2 Aug 2026

Sources: [Art 86 \(Right to explanation\)](#)

Notes:

Section 8 - General-purpose AI models (GPAI) (Applies 2 Aug 2025)

Only complete this section if you are a provider of a general-purpose AI model (not merely a user of a chatbot).

- ☐ If you provide a general-purpose AI model, meet the obligations in Article 53 (e.g., technical documentation and information obligations).

LEGAL (IN FORCE)

Applies: 2 Aug 2025

Sources: [Art 53 \(GPAI duties\)](#); [Art 113 \(Dates\)](#)

Notes:

- ☐ If your model is a general-purpose AI model with systemic risk, meet the additional obligations in Article 55.

LEGAL (IN FORCE)

Applies: 2 Aug 2025

Sources: [Art 55 \(Systemic risk\)](#); [Art 113 \(Dates\)](#)

Notes:

Official sources and notes

Official sources

- [AI Act Service Desk - Timeline](#)
- [AI Act Service Desk - Article 27 \(FRIA\)](#)
- [AI Act Service Desk - Article 49 \(Registration\)](#)
- [AI Act Service Desk - Article 86 \(Explanation\)](#)

Other important sources to consider

- [European Data Protection Supervisor \(EDPS\)](#)
- [High-Risk AI Systems Mapping Report in European Institutions, Agencies and Bodies](#)
- [Guidance for Risk Management of Artificial Intelligence systems](#)
- [Market Surveillance Authorities under the AI Act & single point of contact in EU Member States](#)
- [Guidelines for providers of general-purpose AI models](#)

Note: Educational only. Not legal advice. For legal decisions, consult qualified legal counsel.

- [Extra \(optional\): EDPB “AI Auditing – Checklist for AI Auditing” \(PDF\)](#)