

AI Automatisering's Company Guidelines for EU AI Act Compliance

Author: Stefan Kløvning, COO & Board Member

Company: AI Automatisering AS

Country: Norway

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***Important note:** Level 1 and Level 2 are not official categories set by the European Commission or other regulatory authority, nor should this document in any way be considered legal advice. This is our official company guidelines for our approach to the EU AI Act based on our understanding of the regulation as of current date. This document may be updated as details of the Act becomes clearer. Consider consulting a lawyer for applicable legal advice.*

Level 1: Regulations in force

Description

Compliance Level 1 is the absolute minimum of requirements for compliance with the EU AI Act already set into effect and can may be legally enforced. Violations of this may lead to fines or other punishments. Product development and project fulfilment within AI is accordingly required as of current date to be within the requirements of Level 1.

Requirements

As of 02.02.2025, the requirements within Level 1 currently includes Chapter I & II of the Act:

- *AI literacy:* Taking measures as a provider and vendor of AI-solutions to train staff and strategic partners in the AI systems deployed.
- *Avoiding Prohibited AI Practices:* AI solutions engaging in certain activities are strictly forbidden, including deception, exploitation, discrimination, and several others listed here: <https://artificialintelligenceact.eu/article/5/>

Our Approach

AI literacy

- We actively take measures to upskill our team and expanding our network with other companies, academics, professionals, and other institutions to strengthen our access to up-to-date competence and information within Artificial Intelligence.

- Our upskilling internally on the team includes, but is not limited to, participating in relevant courses, workshops, and events focused on AI and related topics.

Avoiding Prohibited AI Practices

- We are particularly cautious in the planning stage of mid-sized and bigger projects that the scope and technical process may risk involving Prohibited AI Practices. Whether it be in our participation of relevant public tender offers, negotiations with other clients, or in internal business administration, we carefully assess the project requirements and conduct careful risk assessments when we suspect a project may risk fitting the description of any of the prohibited activities.
- For our own product development, especially for solutions intended for commercial use but also for internal applications where relevant, we evaluate the risks of new solutions fitting the description of any of the prohibited activities.

Level 2: Regulations that will come into force at a future date

Description

Compliance Level 2 is the preparation work for compliance for regulations that have not yet been put into legal force. This means they're not strictly mandatory to adhere to now but are expected to go into effect in the future. While not obligatory, preparatory work to adapt to these regulations early may reduce the workload to become compliant to these when they come into effect, as well as have other possible advantages for risk mitigation and business development.

Requirements

As of 02.02.25, only Chapter I and II are within Compliance Level 1, meaning the rest of the regulation remains in Level 2. A few notable dates are important to follow here:

- *02.08.25*: Chapter III Section 4, Chapter V, Chapter VII and Chapter XII and Article 78
 - Chapter III Section 4: Notifying Authorities and Notified Bodies
 - Chapter V: Rules, obligations and codes of practice for General-Purpose AI Models
 - Chapter VII: Governance of AI among member states and authorities
 - Chapter XII: Penalties (except Art. 101 for providers for GENAI)
 - Article 78: Confidentiality (mainly for authorities and regulatory bodies)
- *02.08.26*: Every other provision of the AI Act

Our Approach

Rules going into effect 02.08.25

- Almost all the regulations (except for Chapter V) applying from 02.08.25 are only (or primarily) applicable for governmental entities, regulatory agencies, or other public institutions, and not relevant for private companies like us.
- We mainly consider these regulations from a business perspective to be relevant for affecting the requirements and availability of projects in public tender offers, but not from a compliance perspective as a legal risk.
- Chapter V of the AI Act, which regulates General-Purpose AI (GPAI) models, primarily applies to entities that develop or place such models on the market. Since our work focuses on building specialized solutions on top of existing models like ChatGPT, Claude or Lllama—rather than developing or distributing GPAI models ourselves—we currently do not fall within its direct scope. However, we remain attentive to any potential compliance considerations that may arise from our integration of third-party AI models into our solutions. (For further clarification, see the EC's FAQ: <https://digital-strategy.ec.europa.eu/en/faqs/general-purpose-ai-models-ai-act-questions-answers>). Therefore, we generally don't consider Chapter V to be applicable for us either at this stage.

Most of the rules going into effect on 02.08.25 are not applicable for a private company like AI Automatisering AS, and we have no intention of building a General-Purpose AI Model either for internal use or for commercial applications in the near future.

Although we do not develop General-Purpose AI models, we monitor updates to compliance requirements for companies integrating such models into their systems to ensure continued compliance. If we were to develop a General-Purpose AI Model in the future, this would have to be developed in compliance with Chapter V.

Rules going into effect 02.08.26

Most of the relevant AI regulations for private companies like us come into effect on this date. The relevant rules mainly fall into two categories: transparency requirements in limited risk systems, and obligations for high-risk systems.

Article 50: Transparency Obligations for Providers and Deployers of Certain AI Systems

There are 4 main categories of limited risk systems with requirements to transparency:

1. Communication systems with AI: People have to be informed that they are communicating with an AI system
2. Systems producing AI-generated audio, images, video, and text: Outputs must be marked in a machine-readable content and detectable as AI-generated or manipulated
3. Emotional recognition systems: People must be informed when they're exposed to the systems, and personal data must be processed in accordance with GDPR
4. Deepfakes using generation or manipulation of images, audio, or video: Deployers must disclose that this content is artificially generated or manipulated.

For AI Automatisering AS, nr. 1 is the most applicable. Our AI-powered chatbots are deployed on customer websites and social media platforms such as Instagram and Facebook.

We have already begun the product development to ensure that users of our chatbots and related AI-based communication systems inform the user that they're communicating with AI.

Nr. 2 applies for other AI systems generating audio, image, video or text content which would not fall under the category of nr. 1. It is currently unclear – as is the case with several of the rules in the AI Act – exactly what this means in practice. Official Codes of practices may not be available before 2027-2028, but we aim to follow updated materials from the European Commission and related entities to determine the specifics of this rule. This document and our product development on applicable systems will be adapted when we know more.

AI Automatisering currently does not engage with or intend to engage with projects using emotional recognition systems or deepfakes. If we become involved in these projects in the future, we will carefully review and comply with the obligations in Article 50.

Chapter III: High-Risk AI Systems

High-Risk AI Systems as defined by the European Commission are primarily assessed in context of EU safety regulations of other products and are considered AI systems that are either a safety component in another product or is a product by itself. A list of additional cases is described in Annex III, including but not limited to biometrics, critical infrastructure, education, employment, access to essential private and public services, and law enforcement.

We consider it plausible that we'll become engaged in projects fitting the criteria of a High-Risk AI System in 2025, especially in the context of bigger projects such as public tender offers or other Enterprise AI projects. The opportunities and market for agentic and autonomous AI systems are significant but may also involve considerable risk. In these projects we'll accordingly be particularly thorough with our risk assessment and management in accordance with the requirements in the Act, both in the preparation and fulfilment of these projects.

Summary Judgement

AI Automatisering classifies the criteria for compliance with the EU AI Act in two Levels:

- Level 1: Mandatory requirements in effect that are currently enforceable by law.
- Level 2: Requirements that comes into effect at a future date, where compliance is voluntary and preparatory before the official date of entry into force.

For Level 1, we focus on building AI literacy in our team and network, as well as avoiding Prohibited Activities in our product development and projects we engage in.

For Level 2, our focus is ensuring the transparency of our AI-powered chatbots, which we have already begun working on as part of our preparatory compliance efforts. Additionally, we pay careful attention to the requirements for High-Risk AI Systems when relevant


projects might emerge, as well as reviewing and complying with the transparency requirements of other limited risk systems falling under Article 50.

Overall, although many of the details of the EU AI Act and official codes of practice are yet to be determined, we in AI Automatisering AS are confident that we are well within compliance to the requirements in Level 1 and well prepared for the relevant requirements for us in Level 2 that won't officially go into effect before 2026.

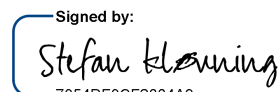
Signatures

The undersigned confirm their approval and commitment to the principles and guidelines outlined in this document, ensuring compliance with the EU AI Act and fostering responsible AI development and implementation within **AI Automatisering AS**.


Chairman

Signed by:

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Name: Sebastian Knørr
Date: 2/18/2025

Board Member

Signed by:

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Name: Stefan Kløvning
Date: 2/18/2025

Board Member

Signed by:

45AD694AE42B439...
Name: Vette Nilsen
Date: 2/18/2025

Board Member

Signed by:

Natcha Uthaug

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Name:

Natcha Uthaug

Date:

2/18/2025