

# EU AI Act 2026 — Compliance checklist

Operational template for CTOs · Regulation (EU) 2024/1689

A single form with the seven check blocks, evidence space per requirement, and a gap section with owner and target date. Open one copy per high-risk or GPAI system and fill it in with your legal, product, and platform teams.

Organization: \_\_\_\_\_ AI system: \_\_\_\_\_

Owner: \_\_\_\_\_ Review date: \_\_\_\_\_

## System classification

High-risk (Annex III)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
GPAI / general-purpose model?	<input type="checkbox"/> Yes <input type="checkbox"/> No
GPAI with systemic risk?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Limited risk (Art. 50 only)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Minimal risk?	<input type="checkbox"/> Yes <input type="checkbox"/> No

## 1. Quality management and data governance

REQUIREMENT	STATUS	EVIDENCE / REFERENCE	OWNER	TARGET DATE
Documented quality management system (Art. 17).	<input type="checkbox"/>			
Governance policies for training, validation, and test data (Art. 10).	<input type="checkbox"/>			

## 2. Technical documentation (Annex IV)

REQUIREMENT	STATUS	EVIDENCE / REFERENCE	OWNER	TARGET DATE
General description of the system, intended purpose, and deployment environments.	<input type="checkbox"/>			
Design specifications: architecture, algorithmic choices, optimization metrics.	<input type="checkbox"/>			
Data information: provenance, labelling, detected biases, and mitigations.	<input type="checkbox"/>			
Performance metrics by demographic subgroup where applicable.	<input type="checkbox"/>			
Risk assessment and mitigation plan (kept current, not static).	<input type="checkbox"/>			
Post-market monitoring and maintenance processes.	<input type="checkbox"/>			

### 3. Logging and traceability (Art. 12)

REQUIREMENT	STATUS	EVIDENCE / REFERENCE	OWNER	TARGET DATE
Automatic logs across the full lifecycle.	<input type="checkbox"/>			
Minimum 6-month retention (often longer).	<input type="checkbox"/>			
Version traceability.	<input type="checkbox"/>			

### 4. Transparency and human oversight

REQUIREMENT	STATUS	EVIDENCE / REFERENCE	OWNER	TARGET DATE
Labelling of AI-generated content where applicable (Art. 50).	<input type="checkbox"/>			
Clear instructions for use.	<input type="checkbox"/>			
Effective human oversight with real ability to intervene.	<input type="checkbox"/>			

### 5. Robustness, accuracy, and cybersecurity (Art. 15)

REQUIREMENT	STATUS	EVIDENCE / REFERENCE	OWNER	TARGET DATE
Documented accuracy tests.	<input type="checkbox"/>			
Documented adversarial tests.	<input type="checkbox"/>			
Cybersecurity measures proportionate to the risk.	<input type="checkbox"/>			

### 6. Conformity assessment and registration

REQUIREMENT	STATUS	EVIDENCE / REFERENCE	OWNER	TARGET DATE
Conformity assessment (internal or by a notified body).	<input type="checkbox"/>			
EU declaration of conformity and CE marking.	<input type="checkbox"/>			
Registration in the EU database (Art. 71).	<input type="checkbox"/>			

### 7. GPAI obligations (if applicable)

REQUIREMENT	STATUS	EVIDENCE / REFERENCE	OWNER	TARGET DATE
Technical documentation of the model and training data (Art. 53.1).	<input type="checkbox"/>			

REQUIREMENT	STATUS	EVIDENCE / REFERENCE	OWNER	TARGET DATE
Copyright compliance policy (Art. 53.1.c).	<input type="checkbox"/>			
Detailed training-data summary (AI Office template).	<input type="checkbox"/>			
Systemic risk: model evaluation, risk management, serious-incident reporting to the AI Office, and reinforced cybersecurity.	<input type="checkbox"/>			

## Gap log

GAP FOUND	OWNER	TARGET DATE	STATUS

Official sources: [artificialintelligenceact.eu](https://artificialintelligenceact.eu) · AI Act Service Desk (European Commission) · AESIA (Spanish national authority) · AEPD. This template is an operational aid, not legal advice. [jacar.es](https://jacar.es)