

EU AI Act — a midmarket checklist

20 requirements in six categories. Tick what holds today, and you have your gap list.

THE DEADLINES · REGULATION (EU) 2024/1689 AS AMENDED BY (EU) 2026/1744

☒	☐	☐	☐	☐
2 Aug 2026	2 Dec 2026	2 Dec 2026	2 Dec 2027	2 Aug 2028
Article 50 — transparency	Synthetic-content marking (Art. 50(2))	New prohibited practices (Art. 5)	High-risk — stand-alone Annex III systems	High-risk — AI embedded in regulated products

A Organisation

- ☐ A1 AI responsible role appointed
- ☐ A2 Governance structure documented
- ☐ A3 Written AI policy published
- ☐ A4 Incident procedure in place

B Mapping

- ☐ B1 AI inventory complete
- ☐ B2 All systems risk-classified
- ☐ B3 Usage description per high-risk system

C Training

- ☐ c1 AI literacy baseline assessed
- ☐ c2 Training plan developed
- ☐ c3 Training documented

D Risk assessment

- ☐ D1 FRIA where required (Art. 27)
- ☐ D2 DPIA and FRIA coordinated
- ☐ D3 Technical documentation (Article 11)
- ☐ D4 Automatic logging implemented

E Vendors

- ☐ E1 AI contracts reviewed
- ☐ E2 Due diligence checklist for vendors
- ☐ E3 Ongoing vendor monitoring

F GDPR & transparency

- ☐ F1 AI output visibly labelled
- ☐ F2 Human intervention documented
- ☐ F3 GDPR coordination completed