

EU AI Act Compliance Checklist 2026

RegShelf · regshelf.com · Last reviewed: 26 August 2026 · Aligned to Regulation (EU) 2024/1689 as amended by Regulation (EU) 2026/1744 (Digital Omnibus on AI, in force since 27 July 2026)

Eleven steps from a blank page to documented baseline compliance. Work top to bottom: the first steps establish what you have and what applies; the later steps close the gaps that are already enforceable in 2026.

☐ **Step 1 — List every AI system you use, provide or embed**

Fill the AI System Inventory (Lite): system, vendor, purpose, owner, data processed, who is affected by outputs. Include third-party tools like generative AI assistants and AI features inside SaaS products. This inventory is the backbone for every later step.

☐ **Step 2 — Determine your role for each system (Art. 3(3)-(4))**

Record provider or deployer per system. You are a provider if you develop a system or offer one under your own name or trademark; a deployer if you use it professionally under your authority. Watch Article 25(1): white-labelling or substantially modifying a high-risk system makes you its provider.

☐ **Step 3 — Screen every system against the Article 5 prohibitions**

In force since 2 February 2025: manipulative techniques causing significant harm, social scoring, untargeted facial-image scraping, emotion recognition at work and in education, and the other listed practices. Document the outcome even when it is 'nothing prohibited' — fines here are the highest tier.

☐ **Step 4 — Diarise 2 December 2026: new CSAM/NCII prohibitions**

Regulation (EU) 2026/1744 adds prohibitions on AI systems generating or manipulating child sexual abuse material or non-consensual intimate imagery, applying from 2 December 2026. For providers of generative systems the prohibition is conditional on intended purpose or reasonably foreseeable, reproducible outcomes without adequate safeguards.

☐ **Step 5 — Put Article 4 AI literacy measures in place**

Since 2 February 2025, take measures supporting the development of sufficient AI literacy among staff using AI on your behalf — a short policy, role-appropriate guidance and records are a practical way to evidence these measures. As amended by the Omnibus, no guaranteed competence level per individual is required, and training is one possible measure, not the only one.

☐ **Step 6 — Implement provider transparency duties (Art. 50(1)-(2)), if you provide**

Since 2 August 2026: design systems interacting with people so they know they are dealing with AI, and mark synthetic audio, image, video and text in machine-readable form. Generative systems on the market before 2 August 2026 have until 2 December 2026 to comply with marking. No SME exemption.

☐ **Step 7 — Implement deployer transparency duties (Art. 50(3)-(4)), if you deploy**

Inform people exposed to emotion recognition or biometric categorisation, and disclose deepfakes and AI-generated or manipulated text published to inform the public on matters of public interest. Marking of synthetic output stays with the tool's provider — using a third-party generative tool does not transfer that duty to you.

☐ **Step 8 — Run vendor due diligence before onboarding any AI tool**

Verify the vendor's role and yours, Annex III exposure, built-in Article 50 features, data flows and GDPR roles, and contractual AI Act commitments. Repeat the inventory, role and screening steps for every new tool at intake.

☐ **Step 9 — Flag potential Annex III high-risk systems now**

Recruitment and candidate screening, creditworthiness scoring, education, essential services, biometrics and the other Annex III areas become high-risk on 2 December 2027. Systems performing profiling of natural persons are always high-risk; an Article 6(3) derogation requires a documented assessment and registration under Article 49(2).

☐ **Step 10 — Plan the provider workstream for 2027-2028, if it applies**

Providers of Annex III systems need risk management, data governance, Annex IV technical documentation (simplified form available for SMEs), human oversight design, conformity assessment and registration by 2 December 2027 — realistically a 12-18 month programme. Annex I product-embedded AI follows on 2 August 2028.

☐ **Step 11 — Set up a compliance calendar and keep everything current**

Diarise 2 December 2026, 2 December 2027 and 2 August 2028, review the inventory at least when tools change, and record who signed off each step. Fines are proportionate for SMEs, start-ups and small mid-caps — the lower of the percentage or fixed amount (Article 99(6)) — and good documentation is key evidence of compliance.

Next steps

Check which obligations apply to your company with the free 2-minute checker at regshelf.com/checker. When you are ready to close the gaps, the EU AI Act Kit provides fill-in templates for every step above — 24 documents in Word and Excel with twelve months of updates: regshelf.com/kit.