

Is your organisation ready for Annex III?

Five questions the board must be able to answer before the AI Act's high-risk obligations apply.

If the board can answer these five questions **with data** —not impressions—, the organisation is where it should be. If any is missing, there is work to do before the Regulation is fully enforceable.

- 1. Inventory**
How many systems in operation process personal data and produce a decision, recommendation or score about people?
Criterion: an up-to-date AI system registry exists, with risk classification and an assigned internal owner.

 - 2. Classification**
Of those systems, how many fall under any of the eight high-risk Annex III categories?
Criterion: classified with uniform criteria, even if the supplier hasn't labelled it (Art. 26: deployer status does not transfer to the supplier).

 - 3. Accountability**
For each high-risk system, who is the internal deployment owner and to whom do they report?
Criterion: accountability documented in writing, with an identifiable person.

 - 4. Records and oversight**
Are there operating records, documented human oversight and a serious-incident notification procedure?
Criterion: the three elements implemented (Arts. 14 and 73 of the Regulation).

 - 5. Exposure**
What sanction does the organisation face, in base and adverse scenarios, if the date arrives without the above?
Criterion: exposure quantified: up to EUR 15M or 3% of global annual turnover, whichever is higher (Art. 99).
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The five answers, **in writing and signed by an identifiable owner**, are the evidence of the board's duty of care on this matter. If any of the five is missing, there is work to do before the deadline.