How AOS-1 covers EU Artificial Intelligence Act (Regulation 2024/1689)

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Executive summary

AOS-1's 45-control Operating Assurance Standard maps to **EU Artificial Intelligence Act (Regulation 2024/1689)**. Across the standard:

- **29** distinct AOS-1 controls cite this framework
- **35** total references in the catalog
- **17** sections of EU Artificial Intelligence Act (Regulation 2024/1689) are cited
- **4** sections remain unmapped (see *Gaps and closure plan* below)

Covered sections

For each cited section of EU Artificial Intelligence Act (Regulation 2024/1689), the AOS-1 controls that evidence it and the suggested authoring guidance per control.

Art. 10 — Data and data governance

Cited by 3 AOS-1 controls:

- **AOS1-DAT-001** — AI training and inference data has a classification policy *(critical)*
  - Document the data-governance policy that classifies data used in AI training, fine-tuning, and inference. EU AI Act Art. 10 expects representativeness, accuracy, and lawful basis to be addressed.
- **AOS1-DAT-002** — PII handling in AI workflows is documented and controlled *(critical)*
  - Document PII handling: minimization, retention limits, redaction, lawful basis, and cross-border transfer paths. EU AI Act Art. 10 expects this for data used in high-risk AI.
- **AOS1-MON-006** — Bias / fairness monitoring on high-impact AI *(critical)*

Art. 11 — Technical documentation

Cited by 1 AOS-1 control:

- **AOS1-INV-001** — AI Systems Inventory is maintained *(critical)*

Art. 12 — Record-keeping

Cited by 2 AOS-1 controls:

- **AOS1-AGT-003** — Agent action trace and lineage are retained *(critical)*
  - Document agent action trace + lineage retention. EU AI Act Art. 12 expects record-keeping sufficient to reconstruct AI decisions.
- **AOS1-AUD-001** — AI decision lineage is retained for material decisions *(critical)*
  - Document the decision-lineage retention for material AI decisions. EU AI Act Art. 12 expects record-keeping sufficient to enable post-market analysis.

Art. 14 — Human oversight

Cited by 4 AOS-1 controls:

- **AOS1-OVR-001** — Human-in-the-loop is defined for high-risk AI *(critical)*
  - Document the human-oversight design per high-risk AI: who the human is, when they intervene, and what they can do (modify / override / halt). EU AI Act Art. 14 expects effective, not nominal, oversight.
- **AOS1-OVR-002** — Approval workflows exist for material autonomous actions *(critical)*
  - Show the approval workflow record for autonomous AI actions that are material. Demonstrate that human intervention is possible AND was exercised in past audits.
- **AOS1-AGT-001** — Authority chain for autonomous agents is defined *(critical)*
- **AOS1-AGT-002** — Kill switch / emergency halt is operational *(critical)*
  - Document the kill-switch mechanism and at least one tested activation. EU AI Act Art. 14 expects effective human oversight, including the ability to halt.

Art. 15 — Accuracy, robustness and cybersecurity

Cited by 3 AOS-1 controls:

- **AOS1-MON-002** — Drift detection on AI behavior is implemented
  - Document drift-detection controls aligned with EU AI Act Art. 15 accuracy, robustness, and cybersecurity expectations.
- **AOS1-MON-005** — Performance monitoring against pre-locked baseline *(critical)*
- **AOS1-MON-006** — Bias / fairness monitoring on high-impact AI *(critical)*

Art. 17 — Quality management system

Cited by 1 AOS-1 control:

- **AOS1-GOV-001** — AI Governance Charter exists and is board-ratified *(critical)*

Art. 19 — Automatically generated logs

Cited by 3 AOS-1 controls:

- **AOS1-DAT-003** — Retention rules for AI logs and lineage are defined
  - Document the retention policy for AI logs and lineage. EU AI Act Art. 19 expects automatically generated logs retained for a defined period sufficient for post-market monitoring.
- **AOS1-AGT-003** — Agent action trace and lineage are retained *(critical)*
  - Show automatically generated logs of agent actions including inputs, outputs, decision rationale, and policy under which authorized. EU AI Act Art. 19.
- **AOS1-AUD-002** — Append-only audit log for AI actions is operational *(critical)*
  - Provide the append-only audit log for AI actions: events covered, tamper-evidence, retention. EU AI Act Art. 19 expects automatically generated logs.

Art. 25 — Responsibilities along the AI value chain

Cited by 1 AOS-1 control:

- **AOS1-TPY-004** — Vendor material-change notification path is established

Art. 26 — Obligations of deployers of high-risk AI systems

Cited by 1 AOS-1 control:

- **AOS1-REG-001** — Regulatory exposure for AI is mapped *(critical)*
  - Where the organization deploys high-risk AI in the EU, show the Art. 26 deployer obligations (use as intended, oversight, log retention, notifications) are documented and owned.

Art. 27 — Fundamental rights impact assessment

Cited by 1 AOS-1 control:

- **AOS1-RSK-002** — High-risk AI undergoes formal risk and impact assessment *(critical)*
  - For each fundamental-rights-impacting AI deployment, provide the FRIA. EU AI Act Art. 27 specifies the elements and the public-body filing path.

Art. 4 — AI literacy

Cited by 3 AOS-1 controls:

- **AOS1-INV-003** — AI Tool Usage Register tracks employee-facing AI tools
- **AOS1-ENB-001** — Employee AI usage training is delivered *(critical)*
  - Show that employees with AI access have AI literacy training. EU AI Act Art. 4 expects literacy proportionate to role and AI risk.

- **AOS1-ENB-002** — AI literacy program covers leadership
    - Show that executive leadership and board have AI literacy briefings. Art. 4 covers all relevant staff including senior leadership for oversight.

Art. 5 — Prohibited AI practices

Cited by 1 AOS-1 control:

- **AOS1-USE-002** — Prohibited AI use cases are explicitly documented *(critical)*
    - Document the prohibited-use list aligned to EU AI Act Art. 5 prohibited practices, plus any organization-policy prohibitions on top.

Art. 6 — Classification rules for high-risk AI systems

Cited by 1 AOS-1 control:

- **AOS1-INV-002** — AI Risk Classification is applied per system *(critical)*
    - Show the risk-classification rationale per system against EU AI Act Annex III and the prohibited-practices list. Document who decided and on what evidence.

Art. 72 — Post-market monitoring

Cited by 4 AOS-1 controls:

- **AOS1-INC-006** — Monitoring-triggered incidents are classified separately
- **AOS1-MON-001** — Continuous monitoring is operational for high-risk AI *(critical)*
    - Provide post-market monitoring evidence per high-risk AI: dashboards, alert rules, responder runbook. EU AI Act Art. 72.
- **AOS1-MON-005** — Performance monitoring against pre-locked baseline *(critical)*
- **AOS1-MON-007** — Monitoring-signal reporting to issuer

Art. 73 — Reporting of serious incidents

Cited by 3 AOS-1 controls:

- **AOS1-INC-001** — AI Incident Response Plan exists *(critical)*
    - Provide the AI Incident Response Plan with the EU AI Act Art. 73 serious-incident reporting path: who detects, who triages, when authorities are notified.
- **AOS1-INC-002** — Incident escalation paths are defined and tested
    - Show escalation paths align with EU AI Act Art. 73 timelines for serious incidents. Cite at least one annual exercise that tested the path.
- **AOS1-MON-007** — Monitoring-signal reporting to issuer

Art. 86 — Right to explanation of individual decision-making

Cited by 2 AOS-1 controls:

- **AOS1-OVR-003** — AI output review process exists for material decisions
  - Show how the output-review process supports the EU AI Act Art. 86 right to explanation: reviewers can inspect inputs, reasoning evidence, and AI confidence.
- **AOS1-AUD-001** — AI decision lineage is retained for material decisions *(critical)*
  - Show that decision lineage supports the Art. 86 right to explanation: a consumer can be told the principal reasons their AI-driven decision went as it did.

Art. 9 — Risk management system

Cited by 1 AOS-1 control:

- **AOS1-RSK-002** — High-risk AI undergoes formal risk and impact assessment *(critical)*
  - Provide the AI impact assessment per system. EU AI Act Art. 9 specifies the risk-management system shape: identification, estimation, evaluation, mitigation.

Gaps and closure plan

These sections of EU Artificial Intelligence Act (Regulation 2024/1689) are registered in the AOS-1 catalog but not yet cited by any AOS-1 control. Each gap is classified as a proposed new control, an expansion of an existing control, or out-of-scope (definitional / not a deployer-side obligation).

Propose new control

- **Art. 13** — Transparency and information provision
  - *Proposed control*: **AOS1-USE-004** (usage_controls)
  - *Title*: Deployer-facing transparency artifacts are provided
  - *Description*: When the organization provides high-risk AI to a deployer, the Art. 13 transparency package is provided: instructions for use, capability/limitation summary, oversight expectations, and performance/accuracy claims.
  - *Rationale*: EU AI Act Art. 13 obligates providers to inform deployers — relevant if AOS-1 customers are providers, not just deployers.
- **Art. 50** — Transparency obligations for certain providers and deployers
  - *Proposed control*: **AOS1-USE-005** (usage_controls)
  - *Title*: Special-case transparency disclosures (GenAI, emotion-recognition, biometric, deepfake)

    - *Description*: Where AI in use falls under EU AI Act Art. 50 special cases — generative AI outputs, emotion-recognition, biometric categorisation, AI-generated content — the appropriate user-facing disclosure is operationalized.
    - *Rationale*: Art. 50 targets specific use cases that need user-level disclosure beyond the generic transparency under Art. 13.
- **Art. 55** — Obligations for providers of GPAI models with systemic risk
    - *Proposed control*: **AOS1-RSK-004** (risk_management)
    - *Title*: GPAI systemic-risk obligations are operationalized (providers only)
    - *Description*: For providers of GPAI models with systemic risk: model-evaluation results, adversarial-testing records, energy-consumption disclosure, and serious-incident reporting paths align with Art. 55.
    - *Rationale*: Art. 55 only applies to GPAI providers; not all customers need this control. Tagged as optional.

Expand existing control

- **Art. 18** — Documentation keeping
    - *Expand existing control*: **AOS1-AUD-001**
    - *Rationale*: Art. 18 is the documentation-retention companion to Art. 12 (record-keeping) already cited by AUD-001. Add Art. 18 to that control's refs.

Disclaimer

This document summarises the AOS-1 Operating Assurance Standard's crosswalk to EU Artificial Intelligence Act (Regulation 2024/1689) as of the generation date above. It is **not a legal opinion** and does not replace the authoritative text of the cited framework. AOS Trust prompts and gap suggestions are authoring aids.

Authoritative source: https://trust.aos-1.com/frameworks/eu_ai_act