

NOVUS POINT

AI AUDIT · REGULATION (EU) 2024/1689

AI risk map: extract from an audit report

ILLUSTRATIVE EXAMPLE · FICTIONAL COMPANY

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VERDICT

High risk in HR: deadline 2027, Articles 4 and 50 already apply

HIGH-RISK (ANNEX III): DEADLINE 2027

The audit covered production, HR, customer service and marketing (250 people) and identified 8 AI systems. Two of them, the CV filter in recruitment and the warehouse operative performance scoring, qualify as high-risk systems under Annex III (obligations from 2 December 2027, after the deferral by Regulation (EU) 2026/1744). The duty to support AI literacy (Article 4, applied from 2 February 2025, in the wording amended from 27 July 2026) and the transparency duty for the chatbot (Article 50(1), applied from 2 August 2026) already apply to you. We also found one shadow AI practice in the sales department, which needs to be closed within 30 days.

2

obligations already apply

Article 4 from 2 February 2025,
Article 50(1) from 2 August 2026

2

high-risk: deadline 2027

Annex III, point 4(a) and (b)

1

shadow AI: 30 days

outside the register, customer data

8

AI systems in the organisation

full list on page 3

POTENTIAL FINANCIAL EXPOSURE

up to EUR 15,000,000

Statutory maximum: up to EUR 15,000,000 or 3% of turnover, whichever is higher (Article 99(4); for SMEs, the lower of the two)

For high-risk systems from 2 December 2027 · Penalties enforceable since 2 August 2025

CATEGORY	AMOUNT	TURNOVER	BASIS
Prohibited practices (Article 5)	EUR 35,000,000	7%	Article 99(3)
• Other substantive obligations	EUR 15,000,000	3%	Article 99(4)
Incorrect information	EUR 7,500,000	1%	Article 99(5)

The amounts are statutory maxima under Article 99 of Regulation (EU) 2024/1689, not a forecast of a penalty. The higher of the two values applies; for SMEs, the lower. The actual amount is set solely by the market surveillance authority.

This report is classificatory in nature and is not legal advice or documentation for a supervisory authority. The final classification requires individual analysis in the context of Article 6(3) and the intended purpose of each system. Compliance status is determined solely by the competent national market surveillance authority. Prepared on the basis of the official text of Regulation (EU) 2024/1689 as amended by Regulation (EU) 2026/1744. The amounts are statutory maxima under Article 99.

AI systems identified in the organisation

Method: interviews with departments, a review of tools, log samples. The assessment below is classificatory in nature and is not legal advice.

System / use	Who uses it	AI Act classification	Risk to the board	Hours-recovery potential	Recommendation and owner	Internal deadline
CV filter in the recruitment system: automatic rejection and ranking of candidates for production roles	HR department (2 people)	High-risk: Article 6(2) read with Annex III, point 4(a) of Regulation (EU) 2024/1689 (obligations from 2 December 2027)	HIGH	about 20% of HR department time	Human oversight and deployer obligations under Article 26; owner: HR Manager	60 days
Warehouse operative performance scoring system: automatic pace-of-work reports from scanning terminals	Logistics department (40 people covered)	High-risk: Article 6(2) read with Annex III, point 4(b) of Regulation (EU) 2024/1689 (obligations from 2 December 2027)	HIGH	about 8% of shift supervisors' time	Article 26 obligations, including informing workers and their representatives (Article 26(7)); owner: Chief Operating Officer	90 days
Website chatbot: answers customer questions about availability and lead times	Customer service department	Minimal risk, with a transparency obligation: Article 50(1) of Regulation (EU) 2024/1689 (obligation already applies)	MEDIUM	about 10% of customer service team time	Add a visible notice "you are talking to an AI system"; owner: Customer Service Manager	30 days
Pasting customer data into a public AI chat: sales staff translate and summarise customer correspondence in a publicly available tool	Sales department (6 people, informal practice)	Outside AI Act classification as such: data protection and trade secret risk	HIGH SHADOW AI	about 12% of sales team time	Approved AI tools policy and training under Article 4; owner: Sales Director	30 days
Vision cameras for quality control: detecting surface defects on the packing line	Quality department	Minimal risk: product inspection, outside Annex III	LOW	about 6% of quality inspectors' time	Record in the AI systems register; owner: Quality Manager	90 days
Predictive maintenance: analysis of motor vibration and temperature on the production line	Maintenance department	Minimal risk: diagnostic tool, no effect on individuals	LOW	about 15% of maintenance team time	No action required. Record in the AI systems register; owner: Maintenance Manager	not applicable
Marketing graphics and copy generator: web and social media material created in a generative tool	Marketing department (2 people)	Deployer transparency obligation: Article 50(4) (deepfake content only); machine-readable marking under Article 50(2) falls on the tool provider	MEDIUM	about 18% of marketing team time	Label deepfake content and confirm Article 50(2) marking with the vendor; owner: Marketing Manager	60 days
AI assistant in company email: summaries and reply suggestions in office staff mailboxes	All office staff (about 60 people)	Minimal risk: feature of standard office software	LOW	about 9% of office working time	Include in the AI systems register and in AI literacy training under Article 4; owner: IT department	90 days

Classification assessment prepared on the basis of Regulation (EU) 2024/1689 as amended by Regulation (EU) 2026/1744. It is not legal advice.

RECOMMENDED NEXT STEP

Decisions for the board

1. Suspend independent recruitment decisions by the CV filter until human oversight and the compliance documentation required for a high-risk system are in place (internal deadline: 60 days).
2. Close the practice of pasting customer data into public AI tools within 30 days, through an approved-tools policy and training for the sales team.
3. Approve a budget and an owner for the AI systems register covering all eight items identified in the audit, as the basis for the next stages (internal deadline: 90 days).

Diagnostic conversation: enquiries@novus-point.co.uk · novus-point.com

Scope and nature of the assessment

Audit scope: production, HR, customer service, marketing (250 people). Method: interviews with departments, a review of tools, log samples. This report is classificatory in nature and is not legal advice or documentation for a supervisory authority. The final classification requires individual analysis in the context of Article 6(3). Compliance status is determined solely by the competent national market surveillance authority. Novus Point advises on the operational and documentation side. We are not a law firm: legal advice stays with the client's counsel.

Prepared on the basis of the official text of Regulation (EU) 2024/1689 as amended by Regulation (EU) 2026/1744. The amounts are statutory maxima under Article 99.