

# EU AI Act (whole Part)

## Audit Checklist

**263** audit questions across **38** sections.

### HOW TO USE THIS CHECKLIST

Each question has three boxes the auditor fills in during the audit:

1. **Compliance** — the binary headline: Compliant / Non-compliant.
2. **Classification** — where the gap is, four-state grid: Documented / Implemented matrix.
3. **Finding level** — severity: Maj / Min / Obs (Major nonconformity / Minor nonconformity / Observation).

Severity is the auditor's call on the day, against the real finding — no severity is pre-suggested per question.



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## High-risk AI systems referred to in Article 6(2)

**Q1** ANNEX

AI-Act Annex-III.1

Does the entity provide, deploy, distribute or import any biometrics AI system (where permitted under Union/national law) – (a) remote biometric identification (excluding verification-only); (b) biometric categorisation by sensitive/protected attributes; or (c) emotion recognition?

**SOURCE VERBATIM**

1. Biometrics, in so far as their use is permitted under relevant Union or national law:

- (a) remote biometric identification systems. This shall not include AI systems intended to be used for biometric verification the sole purpose of which is to confirm that a specific natural person is the person he or she claims to be;
- (b) AI systems intended to be used for biometric categorisation, according to sensitive or protected attributes or characteristics based on the inference of those attributes or characteristics;
- (c) AI systems intended to be used for emotion recognition.

– Regulation (EU) 2024/1689 Annex III(1), Original 2024-06-13 (EU AI Act)

**COMPLIANCE**

Compliant  Non-compliant

**CLASSIFICATION (FOUR-STATE)**

- Documented and Implemented
- Documented Not Implemented
- Not Documented but Implemented
- Not Documented and Not Implemented

**FINDING LEVEL**

Maj  Min  Obs  
Maj = Major nonconformity · Min = Minor nonconformity · Obs = Observation

**SUGGESTED EVIDENCE TO REQUEST**

- Inventory of biometrics AI systems
- Per system: scope classification under (a)/(b)/(c) with verification-only exclusion documented

**MANAGEMENT SYSTEM REFERENCE:**

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**FINDINGS / NOTES:**

Does the entity provide or deploy any AI system intended to be used as a safety component in the management and operation of critical digital infrastructure, road traffic, or in the supply of water, gas, heating or electricity?

SOURCE VERBATIM

1. Critical infrastructure: AI systems intended to be used as safety components in the management and operation of critical digital infrastructure, road traffic, or in the supply of water, gas, heating or electricity.

— Regulation (EU) 2024/1689 Annex III(2), Original 2024-06-13 (EU AI Act)

COMPLIANCE

Compliant  Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
- Documented Not Implemented
- Not Documented but Implemented
- Not Documented and Not Implemented

FINDING LEVEL

Maj  Min  Obs  
Maj = Major nonconformity · Min = Minor nonconformity · Obs = Observation

SUGGESTED EVIDENCE TO REQUEST

- Inventory of critical-infrastructure AI safety components
- Sectoral classification per system

MANAGEMENT SYSTEM REFERENCE:

FINDINGS / NOTES:

[Empty text box for findings and notes]

Does the entity provide or deploy any AI system in education and vocational training – (a) determining access/admission/assignment; (b) evaluating learning outcomes (incl. steering the learning process); (c) assessing appropriate level of education; or (d) monitoring/detecting prohibited behaviour during tests, in or for educational/vocational training institutions at any level?

SOURCE VERBATIM

1. Education and vocational training:

- (a) AI systems intended to be used to determine access or admission or to assign natural persons to educational and vocational training institutions at all levels;
- (b) AI systems intended to be used to evaluate learning outcomes, including when those outcomes are used to steer the learning process of natural persons in educational and vocational training institutions at all levels;
- (c) AI systems intended to be used for the purpose of assessing the appropriate level of education that an individual will receive or will be able to access, in the context of or within educational and vocational training institutions at all levels;
- (d) AI systems intended to be used for monitoring and detecting prohibited behaviour of students during tests in the context of or within educational and vocational training institutions at all levels.

– Regulation (EU) 2024/1689 Annex III(3), Original 2024-06-13 (EU AI Act)

COMPLIANCE

Compliant  Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
- Documented Not Implemented
- Not Documented but Implemented
- Not Documented and Not Implemented

FINDING LEVEL

Maj  Min  Obs  
 Maj = Major nonconformity · Min = Minor nonconformity · Obs = Observation

SUGGESTED EVIDENCE TO REQUEST

- Inventory of education/training AI systems
- Per system: scope-classification under (a)/(b)/(c)/(d)

MANAGEMENT SYSTEM REFERENCE:

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FINDINGS / NOTES: