CASE STUDY 07 · CONFIDENTIAL CLIENT ENGAGEMENT

EU AI Act risk classification and conformity readiness

Classifying a customer-facing AI decision system under the EU AI Act and setting out the documentation it needed.

CLIENT SECTOR AI system used in customer-facing decisions	MY ROLE Classification and documentation adviser
WORKED WITH Product and engineering leadership, legal and compliance	FOCUS Annex III, conformity route, Annex IV

The situation

The system was already in use without a formal classification. Its use case pointed towards the high-risk tier, which brings conformity assessment and documentation duties.

What I did

1. **Classification memo**
   The system classified against the Act's risk tiers, with the Annex III reasoning written down.
2. **Conformity route**
   A recommendation between internal control and notified-body assessment, based on the classification and intended use.
3. **Documentation gap analysis**
   Existing technical documentation reviewed against Annex IV, listing what still had to be produced.
4. **Post-market monitoring plan**
   Monitoring and incident-reporting arrangements for the system once live.

HOW I APPROACHED IT

I recorded the reasoning behind the classification, not just the result, so it can be explained if it is questioned later.

Similar work I take on

- AI systems used in employment, credit or other high-risk decisions
- Organisations that deployed AI features without a classification
- Teams preparing an AI product for the EU market

The client's name and working documents are withheld under confidentiality.

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