



## EU AI Act

AI Literacy:

*A Briefing*

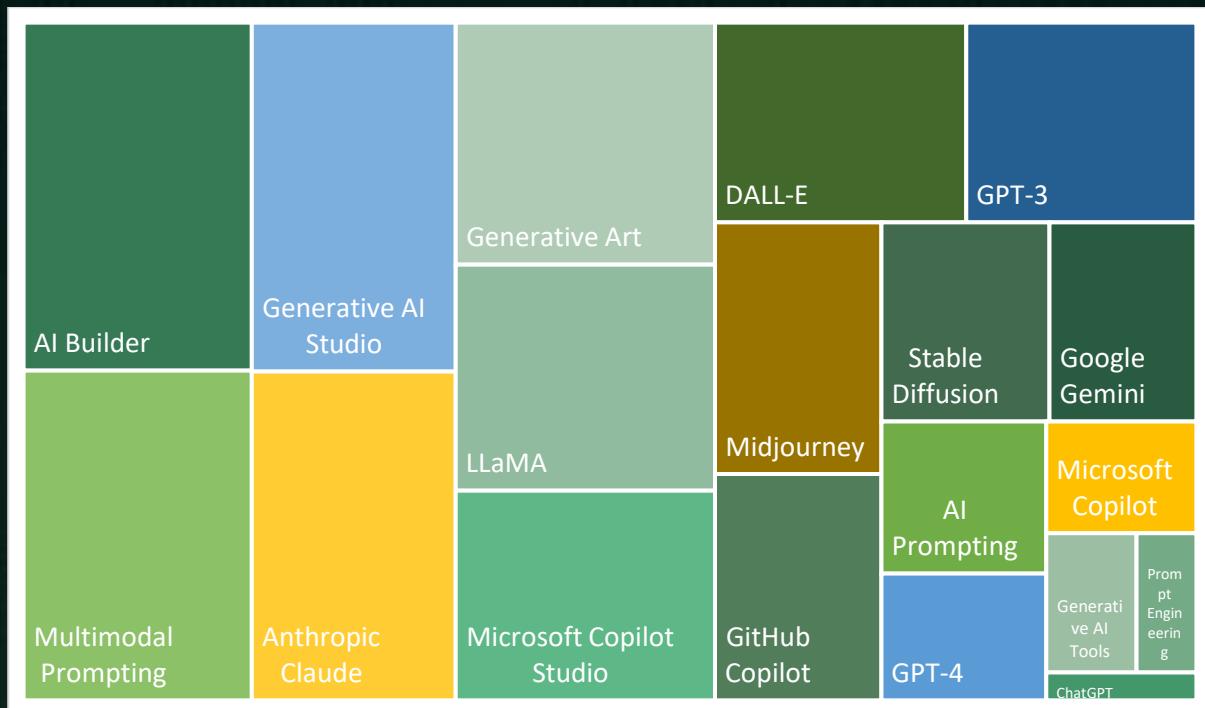
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**AI literacy is emerging as the foundation of digital fluency, reshaping how individuals and organizations interact with technology — develop understanding, build capability, and upskill across industries.**

*OECD.AI: Top AI literacy skills worldwide (October 2025)*



AI literacy is becoming a critical component of digital capability across all sectors. The global ranking of AI skills highlights how individuals are learning to interact with intelligent systems, starting with accessible tools like **ChatGPT** (1) and expanding into more complex competencies such as **Prompt Engineering** (2) and **Generative AI Tools** (3). These skills form the foundation of practical AI literacy—enabling users to communicate effectively with models, understand their outputs, and apply them in everyday workflows. The prominence of tools like **Microsoft Copilot** (4) and **GPT-4** (5) shows how literacy is increasingly embedded in productivity environments rather than confined to technical domains.

As AI becomes more multimodal, literacy now spans text, code, and visual generation. Skills such as **Stable Diffusion** (8), **Midjourney** (10), and **DALL-E** (12) indicate the rise of creative fluency, while **GitHub Copilot** (9) and **AI Builder** (19) reflect applied literacy within coding and business automation. This diversification demonstrates that AI literacy is no longer a niche skill but a multidisciplinary competency shaping communication, design, and development.

Finally, the presence of **LLaMA** (14), **Anthropic Claude** (16), and **Google Gemini** (7) points to growing literacy around model diversity and responsible use. Understanding multiple architectures, ethical frameworks, and customization tools strengthens users' capacity to evaluate, compare, and govern AI systems effectively. Together, these skills mark the evolution from AI awareness to true digital fluency.



# AI & Partners

Amsterdam - London - Singapore

# Who Are We

## *AI That You Can Trust*

### Why Us?

**Stay on the right side of history.** At AI & Partners, we believe AI should unlock potential—not cause harm. We've seen the fear and fallout when teams lose control of AI, but also the trust and innovation that follow when it's handled responsibly. That's why we exist: to help you build AI you can trust and stand behind—for the long run.

### What Do We Do?

**We enable safe AI usage—for your organization and your clients.** Unknown AI adoption leads to confusion, risk, and reputational damage. We help you take control with tools to identify, monitor, and govern all AI systems—so you're not reacting to AI, you're leading it.

### How Do We Do It?

**Do you know what AI systems you have?** Identify all known and unknown AI systems (algorithms, LLMs, prompts, and models) from all internal and external AI vendors, automated by generating your inventory. Overall, 80% of AI inventory is unknown to our clients.

**How do you guarantee ongoing safe AI use?** Continuously monitor deployed AI systems for performance drift, anomalies or failures, real-world impacts, and emerging risks (e.g. data poisoning). Any malfunction of an AI system has severe implications for organisations (e.g. inability to assess online misinformation that leads to widespread public mistrust), so monitoring becomes a matter of urgency.

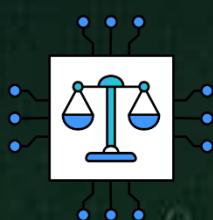
**80%**

of AI systems  
are unknown



#### AI Discovery & AI Inventory

Automatically detect all AI systems, including models, algorithms, and prompts, and maintain a live, always-updated register for full visibility and compliance.



#### Responsible AI

Embed fairness, transparency, and control into every stage of AI use—aligning with the EU AI Act and building ‘Trustworthy-by-Design’.



#### Model Monitoring

Continuously track your AI models after deployment to detect drift, bias, or failure—so you stay in control and prevent harm before it happens.

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# Introduction

As artificial intelligence (AI) becomes a pivotal force in sectors ranging from healthcare to finance, its responsible use is paramount. The AI Literacy framework, outlined in Article 4 of the EU AI Act, represents a crucial step toward ensuring that those involved in deploying and interacting with AI systems are equipped with the knowledge necessary to do so safely and ethically. This report serves as a guide for organizations seeking to meet the AI literacy requirements stipulated by the Act. It provides practical insights on how businesses, public authorities, and other stakeholders can build and implement AI literacy programs to foster informed decision-making and mitigate risks associated with AI technologies.

AI literacy is not merely a compliance exercise but an essential component in ensuring that AI systems are used responsibly and in alignment with human rights, transparency, and accountability. From understanding the technical underpinnings of AI to addressing the legal and ethical considerations, this document offers actionable strategies to embed AI literacy across different roles within organizations. By addressing the specific needs of various stakeholders—from developers to compliance officers—this report helps ensure that AI's deployment maximizes its potential while safeguarding fundamental rights. Through this structured approach, we aim to empower organizations to meet the challenges of AI governance, fostering trust and confidence in AI systems.

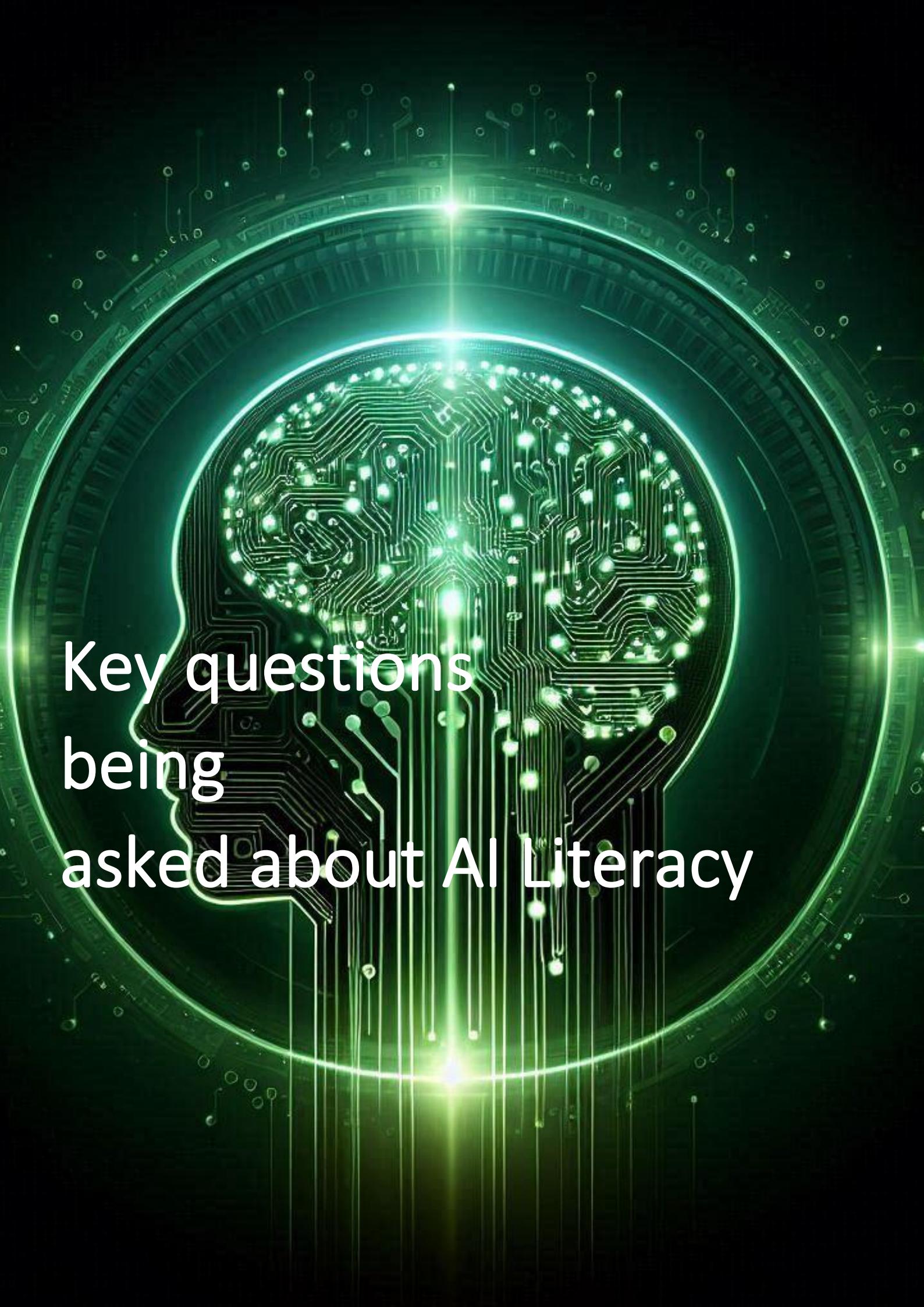
Best regards,

**Sean Musch**

Founder/CEO

AI & Partners



The background of the slide features a glowing green circuit board graphic. The central part of the circuit board is shaped like a human brain, with glowing green lines representing neural pathways and glowing green dots representing neurons. This central brain-shaped circuit board is set against a dark, circular background that resembles a futuristic interface or a stylized eye. The overall aesthetic is high-tech and futuristic.

Key questions  
being  
asked about AI Literacy

## **Q1: What does article 4 of the AI Act provide?**

According to Article 4 of the AI Act, providers and deployers of AI systems are required to adopt measures that guarantee an adequate level of AI literacy among their personnel and others involved in operating and using AI systems on their behalf. These efforts must account for individuals' levels of technical knowledge, their work experience, educational background, and training. It must also consider the specific context in which AI systems are being used and the individuals who are directly affected by these systems.

## **Q2: What is AI literacy for article 4 of the AI Act?**

The concept of AI literacy in Article 4 refers to the definition found in Article 3(56) of the AI Act. This defines AI literacy as the set of skills, knowledge, and understanding that enables providers, deployers, and affected individuals to engage with AI systems in an informed manner. It emphasizes awareness of both the benefits and risks of AI, including potential harms, while also considering the stakeholders' roles and responsibilities under the Regulation.

## **Q3: Which target group is in scope of article 4 of the AI Act? Who are 'other persons'?**

Article 4 applies to all providers and deployers of AI systems and aims to ensure that individuals working with these systems possess the necessary competencies. This includes both direct employees and individuals operating under the organization's scope, such as contractors, clients, or service providers. This provision supports Article 13 (transparency) and Article 14 (human oversight) and indirectly contributes to the protection of individuals affected by AI by promoting compliance with the Act's rules.

## **Q4: Is there effectively an actual obligation to measure the level of the knowledge of employees?**

There is no explicit obligation within Article 4 to formally assess employee knowledge in AI. However, the article does require that providers and deployers maintain a sufficient level of AI literacy among staff, taking into account each person's technical understanding, experience, training, and educational background.

## **Q5: Are there formal categorisations of the different types of AI systems in the Act such as GenAI, Conversational AI, AI assistants? Is there a list with concrete examples?**

Yes. The AI Act differentiates among various types of AI systems and models, such as general-purpose AI (GPAI) models and systems, and those classified as prohibited or high-risk. Non-binding guidelines published by the European Commission on February 6 aim to assist in identifying whether a software product qualifies as an AI system under the Act. These guidelines offer a practical interpretation of the legal definitions and are supplemented by documents on banned AI practices.

## **Q6: Where do we find further documents and videos on Article 4 of the AI Act?**

Information about initiatives related to Article 4 can currently be accessed through the AI Pact webpage. This includes resources such as a recording of the February 20 webinar and the evolving AI literacy repository. A more detailed webpage focused on AI skills and literacy is also being developed.

**Q7: What should be the minimum content to consider for an AI literacy programme complying with article 4 of the AI Act?**

Although the AI Office does not enforce rigid requirements for fulfilling Article 4, it recognizes the importance of adaptability due to AI's rapid evolution. Nonetheless, a compliant literacy initiative should, at minimum, foster organizational understanding of what AI is, how it functions, and its applications. It should also clarify the organization's role as either provider or user, identify system risks, and provide targeted education tailored to individuals' technical proficiency and job function. Consideration should also be given to the context in which the AI operates and its intended beneficiaries. These components should integrate ethical and legal considerations, especially those outlined in the AI Act.

**Q8: Do we have a risk-based approach on following the AI Literacy requirements of article 4 of the AI Act?**

Yes. The approach to fulfilling Article 4 should be proportionate to the organization's role and the risk level of the AI systems it provides or uses. Organizations handling high-risk AI systems, as specified in Chapter III of the AI Act, should consider implementing more extensive literacy measures to ensure staff are prepared to handle these systems safely and effectively.

**Q9: Is an AI training mandatory for article 4 of the AI Act or are other AI literacy initiatives also allowed?**

The choice between formal training and alternative literacy initiatives depends on the organization's specific situation. In many cases, relying solely on instruction manuals will not suffice. Organizations should ensure that the methods used for building AI literacy—whether through formal training or other guidance—are appropriate for the knowledge levels of their target audiences and relevant to how the AI systems are used.

**Q10: What should be the format of a mandatory AI training in companies?**

There is no universally mandated training format under Article 4. The content and delivery should be adapted to each organization's context. Although adopting examples from the AI literacy repository does not equate to guaranteed compliance, these resources can serve as valuable references for designing effective training programs.

**Q11: When it comes to compliance with article 4 of the AI Act, are there requirements for specific industries, including financial services and healthcare?**

No specific industry mandates exist for Article 4 compliance. However, organizations should tailor their literacy programs based on the sector in which AI systems are deployed and the purpose of their use. They must also consider the associated risk levels of the systems involved.

**Q12: AI literacy extends to other persons acting on deployer's behalf: should any service provider using AI have a contractual obligation to demonstrate AI literacy?**

The need for a contractual obligation depends on the nature and risk level of the AI system involved. Generally, service providers or contractors working with AI systems must have adequate AI literacy to perform their tasks, just as employees would.

**Q13: Does a company, whose employees are using ChatGPT for, e.g., writing advertisement text or translating text, need to comply with the AI literacy requirement of Article 4 of the AI Act?**

Yes, such companies are required to inform their employees of the specific risks associated with generative AI tools like ChatGPT, such as the potential for generating misleading or inaccurate content.

**Q14: Does a company, whose employees are using an AI tool with a human-in-the-loop approach, comply with the AI training with internal resources?**

These are two separate issues. Employees who interact with or oversee AI systems, including those designed with a human-in-the-loop, must receive appropriate training tailored to the specific system and their roles.

**Q15: Can we consider people with a degree/experience in AI development as AI literate (in the context of article 4 of the AI Act) without taking any further action?**

Generally, individuals with AI development backgrounds may be considered literate. However, the organization must still evaluate their knowledge against the specific systems in use and ensure they understand all relevant risks, legal, and ethical implications. It should also identify if further training is needed to bridge any knowledge gaps.

**Q16: Are AI literacy training concepts allowed to differentiate between different levels of detail?**

Yes. Article 4 encourages organizations to tailor training based on employees' education, experience, and technical background. Therefore, offering training with varying levels of complexity is not only permitted but advisable.

**Q17: How do organisations have to document their actions to comply with article 4 of the AI Act and the best effort provisions in it? Do they need specific certificates?**

No formal certification is necessary. Organizations can meet documentation requirements by keeping internal records of all relevant training sessions and literacy efforts.

**Q18: Is an AI officer necessary similarly as for the GDPR? Can a DPO and AI officer be the same person? Shall an organisation set up an AI governance board?**

There is no requirement to establish a distinct governance structure, designate an AI officer, or assign these responsibilities to an existing Data Protection Officer (DPO).

**Q19: When will the enforcement start? Is a company already late/at risk if it has not yet an established AI literacy initiative?**

The obligation to foster AI literacy came into force on 2 February 2025. However, formal enforcement by national market surveillance authorities will begin on 3 August 2026.

**Q20: Who will be enforcing article 4 and on which basis?**

Enforcement responsibilities rest with the national market surveillance authorities, who must be designated by 2 August 2025. These authorities will begin active enforcement from 2 August 2026. The AI Office will assist in the implementation process in collaboration with the AI Board.

**Q21: When market surveillance authorities are designated, could they impose penalties for non-compliance starting from 2 February 2025? Are we to expect a difference in this assessment by national authorities?**

Although prohibitions took effect on 2 February 2025, enforcement is not expected until August 2026. The AI Board will work with national authorities to ensure consistent interpretation and application across Member States.

**Q22: What consequences could an organisation face if they are considered to not comply with Article 4 of the AI Act? In what part of Chapter XII is this set out?**

Organizations found non-compliant could face penalties or other enforcement actions determined under national legislation, which must be enacted by 2 August 2025. Penalties will be proportionate and based on factors such as the nature, severity, and intent of the infringement. More severe consequences may arise if incidents occur due to inadequate training or guidance.

**Q23: How does article 4 of the AI Act apply to countries outside the EU who are willing to provide services to EU based countries?**

Article 4 applies to any organization, inside or outside the EU, whose AI systems are placed on the EU market, used within the EU, or otherwise impact people located in the EU.

**Q24: What do you mean that Article 4 of the AI Act is for private enforcement and for public enforcement?**

Public enforcement refers to oversight by Member State authorities ensuring compliance with the AI Act. Private enforcement involves individuals taking legal action if they believe they have suffered harm due to an organization's failure to meet Article 4 obligations.

**Q25: Regarding private enforcement: does this imply that employees may sue their employers if they feel they did not receive adequate training? Could you outline how the police or a law firm might help?**

If someone suffers harm due to insufficient training or guidance on AI systems, they may pursue civil remedies under national laws. The AI Act itself does not establish criminal liability or a direct right to compensation.

**Q26: Will the AI Office issue guidelines on Article 4 of the AI Act like the guideline for prohibited systems published or something comparable or will this be a task for Member States?**

At present, the AI Office plans to share examples, conduct webinars, and provide clarification through Q&As. Additional enforcement guidance may later be issued by national authorities.

**Q27: Since the training is context-specific, will the AI Office issue guidelines for providers of high-risk AI systems of Annex III, to assist them on this front?**

The Commission intends to publish guidelines that address requirements under Articles 8 to 15 and Article 25 of the AI Act. These will also cover literacy topics such as risk management and human oversight.

**Q28: Does the Commission already have a plan to put in place Article 4 of the AI Act in terms of its own employees?**

Yes. The European Commission has already initiated various measures to enhance AI literacy among its workforce. These include an internal AI portal, structured AI training programs for different staff levels, and access to resources about AI tools. The Commission also holds regular Q&A sessions and has formed a community of practice for AI-related discussions.

**Q29: How does the AI Office plan to support EU agencies in developing their AI literacy programs?**

Many EU agencies can use the Commission's training resources through platforms such as EU-Learn, which include AI-specific learning packages and additional educational materials.

**Q30: What additional guidance and resources do the AI Office plan to release in the near future? Will the AI Office share a rubric to test for compliance with AI literacy?**

To promote implementation of Article 4, the AI Office will continue enriching its living repository of AI literacy practices, conduct awareness-raising events, and create a dedicated website focused on AI skills and knowledge.

**Q31: How could industry organisations be of any help for the development of AI literacy?**

The AI Office encourages industry participation via the AI Pact, which provides a collaborative platform for sharing best practices. Contributions to the AI literacy repository are reviewed for accuracy and transparency before being made public.

**Q32: How and where might one get reading access to the living repository?**

The AI literacy repository is publicly accessible online. It offers examples of how various organizations are implementing literacy measures tailored to different employee roles and sectors. However, inclusion in the repository does not equate to official approval or compliance certification.

**Q33: How can SMEs with limited resources ensure that their employees acquire the necessary AI literacy? Are there specific training initiatives or EU support programs?**

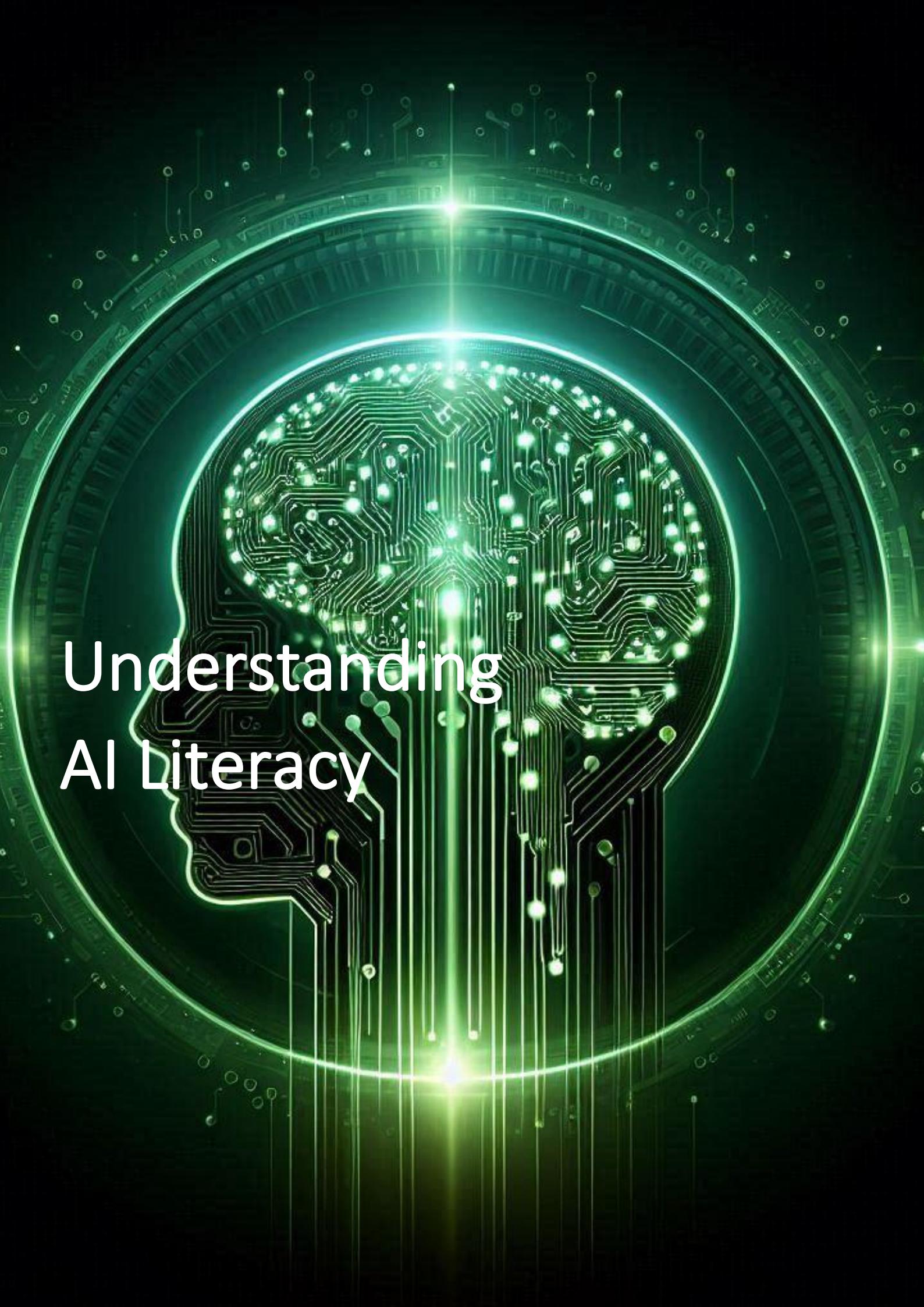
Small and medium-sized enterprises (SMEs) can access services from the European Digital Innovation Hubs (EDIHs), which offer support such as workshops, training, and guidance on AI technologies. These hubs act as local helpdesks for the AI Act and connect SMEs with broader EU support programs.

**Q34: Does the AI Office offer AI literacy basic courses for citizens or do you have already trainings on AI that you recommend?**

The AI Office promotes general literacy through events and educational webinars. Additional free materials can be found on the Digital Skills and Jobs Platform, which includes structured learning paths and curated training content.

**Q35: Is there a specific competence framework when addressing AI Literacy, including for parents, children, caregivers, students and teachers?**

No single framework exists, but multiple well-regarded models are available. These include the Digital Competence Framework for Citizens (DigComp), the EU's ethical guidelines for AI in education, and UNESCO's AI competency frameworks for both teachers and students.



# Understanding AI Literacy

# 1. Overview of Article 4 and AI Literacy



## What is this?

- Article 4 of the AI Act introduces a legal obligation for providers and deployers of AI systems to ensure that individuals involved with AI have a sufficient level of AI literacy.
- AI literacy encompasses the knowledge, skills, and awareness needed to understand how AI functions, the opportunities it presents, and the associated risks and potential harms.

## Why is it relevant?

- AI literacy helps build a foundational layer of responsible AI usage across an organization.
- It supports ethical decision-making and reduces the likelihood of misuse, errors, or biased outcomes when using AI systems.

## How can it be applied?

- Organizations should roll out structured literacy initiatives that include AI basics, operational context, and regulatory requirements.
- Literacy programs must address the specific roles of staff and their proximity to AI systems.
- Companies should also establish regular assessments and updates to these programs to reflect technological advancements, organizational changes.

## 2. Target Groups and Scope



### What is this?

- This section broadens the scope of AI literacy obligations to include not only direct employees but also contractors, service providers, and anyone acting under the control or direction of AI providers or deployers.
- It highlights the importance of aligning literacy with requirements in Article 13 (transparency) and Article 14 (human oversight).

### Why is it relevant?

- AI-related tasks are often distributed across multiple actors inside and outside the organization.
- Ensuring that everyone involved has sufficient AI literacy helps prevent gaps in understanding and accountability.
- It is essential for ensuring consistent and safe AI usage, particularly where decisions may impact fundamental rights.

### How can it be applied?

- Enterprises should identify all individuals whose work involves interaction with AI systems.
- These groups must be included in literacy training programs through tailored onboarding, role-specific training, or contractual obligations.
- Companies should also integrate literacy requirements into vendor and subcontractor policies.

# 3. Compliance Expectations



What  
is this?

- This section details what should be covered in AI literacy programs to meet compliance obligations.
- It includes expectations such as understanding how AI works, the roles and responsibilities of the organization, potential system risks, and ethical and legal dimensions.
- It also suggests tailoring programs to participants' background and context to ensure the training is relevant, and engaging, for diverse teams.

Why is it  
relevant?

- Comprehensive literacy ensures individuals not only understand AI tools but also the organizational and legal frameworks governing their use.
- This clarity reduces risks of error, ensures appropriate human involvement, and strengthens accountability.

How can it  
be applied?

- Develop and deliver layered training programs that start with AI fundamentals and progressively address legal, ethical, and contextual complexities. Incorporate interactive modules, case studies, and industry-specific scenarios to make the training practical.
- Conduct knowledge assessments to ensure understanding and maintain training logs.

## 4. Risk-Based Approach



### What is this?

- This section emphasizes tailoring AI literacy initiatives based on the risk levels of the AI systems in use. Higher-risk systems, as defined under Chapter III of the AI Act, require more intensive and detailed literacy programs.
- Conversely, lower-risk tools may only necessitate basic awareness.

### Why is it relevant?

- Resources for training are limited, and not all AI systems carry equal legal or ethical risk
- It also ensures staff involved with such systems have the necessary competencies to exercise appropriate oversight and intervention, reducing potential liabilities and safeguarding user trust.

### How can it be applied?

- Begin by inventorying AI systems and classifying them by risk level using the AI Act's definitions.
- Design a matrix linking each classification to specific training modules. High-risk systems should trigger detailed and role-specific training.
- Periodically reassess system risk levels and adapt training as systems evolve.
- Integrate this approach into broader governance frameworks.

## 5. Training and Literacy Formats



### What is this?

- The AI Act allows flexibility in how literacy is delivered, including a mix of formal and informal methods.
- However, passive methods such as merely reading instructions are generally insufficient to fulfill the obligation.
- Instead, organizations are encouraged to adopt interactive and engaging formats suited to varying levels of employee expertise and job function.

### Why is it relevant?

- Effective learning depends on the engagement and retention of content.
- Passive training often fails to change behavior or embed understanding, especially when dealing with complex topics like AI.
- Using multiple formats ensures broader reach and accommodates different learning styles and technical backgrounds.

### How can it be applied?

- Develop a blended learning program incorporating workshops, video tutorials, self-paced e-learning, quizzes, and on-the-job simulations.
- Ensure that each format meets minimum engagement standards. Allow staff to choose from formats that suit their schedules or roles but set benchmarks for completion and comprehension.

## 6. Sector-Specific Considerations



### What is this?

- This section clarifies that there are no mandatory sector-specific AI literacy mandates under the regulations.
- However, organizations are encouraged to take into account the context in which AI is used. In particular, industries like healthcare, finance, and legal services are identified as having heightened sensitivity or risk.

### Why is it relevant?

- Sector-specific risks vary significantly. For example, AI errors in healthcare could result in patient harm, while in finance, they could lead to serious economic or compliance consequences.
- Understanding these risks is essential to ensure appropriate training and informed usage of AI tools.

### How can it be applied?

- Organizations can apply this guidance by conducting risk assessments that identify how AI is used in their sector and by whom.
- Based on this, they can develop training programs tailored to the level of responsibility and AI complexity in their field.
- For instance, a hospital might train clinicians on the safe use of diagnostic AI tools.

## 7. AI Literacy for External Parties



### What is this?

- This section explains that AI literacy is not just an internal concern for organizations but must extend to external actors such as service providers, suppliers, and contractors who work with or deploy AI systems on behalf of an organization.
- Depending on the risk level of the AI being used, it may even be necessary to embed AI literacy as a requirement within contractual obligations with third-parties.

### Why is it relevant?

- Third parties often play critical roles in deploying or managing AI systems, which means they can introduce significant risk if they are not appropriately informed.
- Requiring AI literacy among external parties helps organizations ensure that the systems they rely on are being used responsibly.

### How can it be applied?

- Organizations can include AI literacy provisions in procurement contracts or service-level agreements.
- These may require external parties to demonstrate competency, complete specific training, or align with the organization's internal AI risk policies.
- Audits or assessments can be conducted to confirm external compliance.

# 8. Practical Applications

## Example



### What is this?

- This section provides practical examples of AI use in workplaces, such as generative AI tools like ChatGPT for content creation or summarization.
- It emphasizes that individuals do not necessarily need formal certifications to be considered AI-literate.
- Experience or academic degrees in relevant fields may suffice if they are aligned with the specific AI systems.

### Why is it relevant?

- The rise of AI in daily work tasks means that many employees are interacting with complex systems without realizing the risks.
- By defining AI literacy broadly and practically, the regulation promotes informed use of these tools without creating unnecessary barriers.
- This relevance ensures that individuals using AI for routine tasks understand their role in oversight and output validation.

### How can it be applied?

- Employers can implement structured but flexible training programs to ensure users understand how AI tools function and what their limitations are.
- These can include how to critically review AI-generated outputs, how to safeguard data, and when to escalate concerns.
- Employees with prior relevant education or experience may be exempted if their background matches system needs.

# 9. Documentation and Governance



## What is this?

- This section outlines that organizations are not required to obtain external certifications or accreditations to prove AI literacy compliance.
- Instead, maintaining internal documentation—such as records of staff training, guidance documents, and internal communications—is sufficient.

## Why is it relevant?

- This flexible approach minimizes administrative burden while still promoting accountability.
- Organizations can demonstrate compliance through internal measures rather than undergoing formal external evaluation processes.
- This relevance is important for maintaining proportionality, especially for smaller organizations that may lack the resources.

## How can it be applied?

- Organizations can keep internal logs of AI training activities, distribute written guidelines on proper AI use, and optionally assign roles to monitor compliance.
- These records should be readily accessible for internal audits or external reviews, if required.
- Larger or higher-risk organizations may find value in creating governance committees or assigning AI officers to ensure oversight.

# 10. Enforcement and Timelines



## What is this?

- This section details the timeline for the rollout and enforcement of AI literacy obligations.
- While organizations must begin complying from 2 February 2025, formal enforcement by national market surveillance authorities will start on 3 August 2026.
- During this interim period, organizations are expected to prepare internal policies, train relevant personnel, and align with the upcoming regulatory expectations.

## Why is it relevant?

- The phased enforcement allows time for organizations to adapt their practices and avoid sudden penalties.
- It is particularly relevant for those using or developing high-risk AI systems, as these may require more comprehensive preparation.
- The timeline ensures a balance between regulatory effectiveness and operational feasibility.

## How can it be applied?

- Companies should begin reviewing their current AI usage and assess where literacy gaps exist.
- Planning should include setting up training sessions, developing compliance documentation, and possibly consulting legal or technical advisors.
- By the start of the enforcement phase, organizations should be able to demonstrate both good-faith efforts and practical implementation.

# 11. Extraterritorial Application



## What is this?

- This provision clarifies that AI literacy obligations also apply to organizations located outside the EU if their AI systems are used by individuals within the EU or have effects in the EU market.
- This extraterritorial scope ensures that companies engaging with EU consumers or markets are held to the same standards, regardless of their geographic location.

## Why is it relevant?

- As AI systems are often deployed through global platforms, their use and impact are not confined by borders.
- This relevance means that any business—whether based in the US, Asia, or elsewhere—must consider EU regulatory requirements if their AI tools are accessible or influential within the EU.
- It ensures consistent protection for EU citizens and encourages global accountability for AI.

## How can it be applied?

- It violates privacy, fairness, and equality by enabling discriminatory decisions and reputational harm.
- Individuals may be punished or rewarded for behaviors irrelevant to a specific context, leading to systemic injustice, social exclusion, or coercion to conform—akin to surveillance-based control.

# 12. Public vs. Private Enforcement



## What is this?

- This section explains that enforcement of AI literacy requirements will come through two channels: public enforcement by national regulatory authorities and private enforcement through civil lawsuits by individuals harmed by AI misuse.
- This dual mechanism means organizations must be prepared for both regulatory scrutiny and potential legal claims if non-compliance with AI literacy rules results in real-world harm.

## Why is it relevant?

- Understanding the dual enforcement model is crucial because it expands the scope of accountability. It's not only about satisfying regulators—users or affected parties can also hold organizations responsible.
- This relevance encourages a culture of care and compliance that goes beyond minimal legal requirements, reducing the risk of reputational damage.

## How can it be applied?

- Organizations should build robust training, documentation, and reporting processes that can stand up to both regulatory reviews and legal challenges.
- Legal teams should be involved in creating response plans in the event of AI-related harm.
- Transparency, internal audits, and user feedback loops can all support defensible positions.

# 13. AI Office's Role and Initiatives



What  
is this?

Why is it  
relevant?

How can it  
be applied?

- This section describes the supportive role of the AI Office in facilitating the implementation of AI literacy across the EU.
- The Office provides centralized resources, including webinars, a question-and-answer service, and a repository of best practices.
- It also helps coordinate with national authorities to offer localized guidance.

- The AI Office acts as a key resource hub and coordinating body, reducing confusion about how to interpret and implement AI literacy requirements.
- Its relevance lies in the consistency it offers across EU member states, helping organizations access authoritative and practical information.

- Organizations should regularly consult the AI Office's materials to stay informed about updates, webinars, and guidance documents.
- Designated compliance officers or training managers can use these resources to build or supplement internal literacy programs.
- Participation in Q&A forums or events can also help clarify ambiguous requirements.

# 14. Support for EU Agencies and SMEs



## What is this?

- This section highlights the specific support mechanisms available to small and medium-sized enterprises (SMEs) and public bodies, particularly through initiatives like the European Digital Innovation Hubs (EDIHs).
- These hubs offer training, tools, and consulting services to help organizations improve their AI readiness and literacy.

## Why is it relevant?

- Many SMEs and public agencies lack the financial or technical resources to develop comprehensive AI training programs.
- These support systems are therefore crucial in promoting equity in compliance and enabling broad adoption of safe and responsible AI.
- The relevance also lies in ensuring that regulatory implementation doesn't disproportionately burden smaller actors.

## How can it be applied?

- SMEs and public bodies can engage with their local EDIHs to access workshops, personalized training, and AI-readiness assessments.
- These hubs may also help organizations design compliance roadmaps and adopt suitable literacy tools.
- Public sector bodies can integrate EDIH-supported training into their HR or IT development programs.

# 15. Living Repository and Collaboration



## What is this?

- This section introduces the “living repository”—a central, dynamic platform maintained by the AI Office to collect and share AI literacy practices, tools, and initiatives.
- It invites voluntary contributions from industry, academia, and civil society, allowing stakeholders to showcase how they are addressing AI literacy.
- Contributions are regularly reviewed for transparency and quality.

## Why is it relevant?

- The repository supports peer learning and cross-sector collaboration, making it easier for organizations to benchmark and adopt proven literacy practices.
- It’s especially relevant in a fast-changing field like AI, where sharing real-world examples and innovations can prevent duplication of effort and accelerate effective literacy efforts. It also reflects the EU’s commitment to transparency.

## How can it be applied?

- Organizations can use the repository to access templates, case studies, and educational resources.
- Internal teams can adapt shared materials to meet their specific needs.
- Stakeholders are also encouraged to submit their own contributions, showcasing successful initiatives and fostering a culture of shared responsibility.

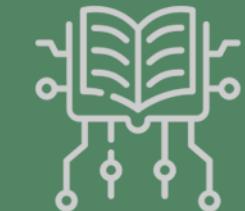


# Mapping AI Literacy to AI Ecosystem Actors

Users must understand AI's functionality, risks, and ethical use to ensure informed interaction and responsible decision-making in practical scenarios.



Clients



### AI Literacy

Understanding AI Systems

Regulators enforce AI laws, ensuring companies comply with safety, ethical standards, and legal frameworks, protecting fundamental rights and privacy.



Regulator



AI Firm

AI Literacy		AI Ecosystem Actor		
Practice	Description	AI Firm	Regulator	Client
Overview of Article 4 and AI Literacy	Outlines the core obligation in Article 4 of the AI Act for AI providers and deployers to ensure a sufficient level of AI literacy among their staff and other relevant persons. Defines AI literacy based on Article 3(56), emphasizing knowledge, skills, and awareness of AI opportunities, risks, and potential harm.	AI firms must ensure their employees and affiliates are sufficiently AI literate per Article 4 of the AI Act. This includes equipping them with the knowledge, skills, and awareness necessary to understand how AI works, its risks, and benefits. Literacy initiatives should emphasize responsible development, deployment, and risk mitigation. Understanding the definition from Article 3(56) is critical for designing suitable training. Firms must also tailor programs to diverse job roles, from developers to marketing teams. Internalizing this requirement strengthens compliance and aligns AI use with legal, ethical, and operational expectations throughout the organization.	Regulators must interpret and monitor Article 4 to ensure AI firms and deployers uphold their obligation to foster AI literacy among relevant individuals. This includes developing frameworks to assess whether organizations are compliant, defining acceptable literacy thresholds, and advising on best practices. Regulators must themselves be literate in AI concepts to evaluate the adequacy of training content. Their role includes public communication, awareness-building, and supporting guidance materials to help industry actors understand what constitutes AI literacy. Regulatory bodies should also collaborate with the AI Office to ensure clarity, consistency, and fairness in implementation across member states.	Clients using AI systems must ensure that relevant staff—especially those making decisions or interacting with AI—understand the technology's function, risks, and limitations. This responsibility applies even if the client is not an AI developer. Literacy must include interpreting AI outputs, recognizing bias or system errors, and escalating concerns appropriately. Clients must align their understanding with the definitions and obligations in Article 4 and ensure their personnel are not misled by system capabilities. Proper literacy helps mitigate misuse, supports accountability, and ensures human oversight. In regulated sectors, it contributes to compliance with industry standards and data protection laws.
Target Groups and Scope	Explains that Article 4 applies not only to employees but also to contractors, service providers, and other individuals acting under the provider or deployer's direction. Reinforces the link between AI literacy, transparency (Article 13), and human oversight (Article 14).	AI firms must ensure AI literacy extends beyond direct employees to include freelancers, contractors, service providers, and others under their operational direction. This broad scope means AI firms must update onboarding protocols, contractual terms, and training access for all personnel influencing AI outcomes. The goal is to ensure that anyone who affects or manages AI deployment understands the associated risks and responsibilities. Firms must also	Regulators must interpret Article 4 broadly to assess compliance not only for core staff but for all relevant persons acting under a provider or deployer's direction. This means evaluating whether literacy programs cover subcontractors, consultants, and others involved in AI system lifecycle management. Regulatory guidance should emphasize that AI literacy is foundational for enforcing Articles 13 and 14, especially regarding explainability and oversight.	Clients need to ensure that all users interacting with AI systems—including external contractors or temporary staff—possess adequate AI literacy. This is essential when outsourcing functions such as customer support, HR analytics, or legal processing that involve AI tools. Clients must define who qualifies as "relevant personnel" under Article 4 and assess their readiness to interpret AI outputs accurately. Moreover, they must bridge literacy with internal policies for human oversight and decision review.

		<p>clarify how literacy supports transparency (Article 13) and human oversight (Article 14), embedding these principles in operational practices. This comprehensive approach helps firms reduce liability and maintain trust across all AI-related functions.</p>	<p>Regulators may also need to provide templates or expectations for how organizations can assess and document AI literacy across various operational roles. This ensures consistency and prevents firms from narrowly interpreting their responsibilities.</p>	<p>Ensuring this broader group is educated helps reduce reliance on opaque systems, encourages responsible usage, and supports legal defensibility if issues arise from AI-driven processes.</p>
Compliance Expectations	<p>Provides guidance on minimum content for AI literacy programs, such as understanding AI, the role of the organization, system risks, and tailoring literacy efforts to staff background and context.</p> <p>Encourages inclusion of legal and ethical considerations tied to the AI Act.</p>	<p>AI firms must design AI literacy programs that meet baseline content requirements outlined in Article 4. This includes education on how AI works, specific system risks, ethical and legal implications, and how the technology fits within the company's role. Programs should reflect employee roles, from technical staff to business and compliance teams. AI firms must demonstrate these efforts through documentation, tailoring programs to internal needs while ensuring coverage of the AI Act's obligations. While certification isn't required, evidence of training and awareness-building must be available during regulatory review or audits to prove organizational readiness and accountability.</p>	<p>Regulators are responsible for defining and validating what constitutes sufficient AI literacy under Article 4. They must set clear expectations for minimum training content, particularly around risk awareness, system functions, legal duties, and organizational responsibilities. Regulators may issue templates, guidance, or evaluation tools to help providers and deployers develop compliant programs.</p> <p>Ensuring that literacy aligns with the AI Act's broader goals, such as ethical use and safety, is crucial. Moreover, regulators must be prepared to assess diverse implementation formats and verify that firms are not relying on superficial or one-size-fits-all approaches to meet compliance.</p>	<p>Clients must implement AI literacy programs that address how AI systems affect their operations, decisions, and compliance obligations. These programs should be tailored to different roles—such as procurement, operations, or compliance teams—and cover system capabilities, limitations, legal context, and ethical considerations. While clients may not be developers, they must still take responsibility for internal literacy if AI is used within their organization.</p> <p>Ensuring informed use reduces operational risk and supports compliance with transparency and oversight requirements. Proper documentation and role-based literacy assessments are key to demonstrating preparedness and reducing liability in cases of system failure or misuse.</p>
Risk-Based Approach	<p>Highlights the importance of adjusting literacy initiatives based on the level of risk associated with the AI systems used, especially high-risk systems as defined in Chapter III of the AI Act.</p>	<p>AI firms must scale their AI literacy efforts based on the risk levels of the systems they develop or deploy. High-risk AI systems (as defined in Chapter III of the AI Act) require deeper, more role-specific training for staff involved in development, deployment, and oversight. Firms should perform risk</p>	<p>Regulators must ensure that organizations adopt a risk-based approach when implementing AI literacy programs. This involves evaluating how firms differentiate training depth and content based on system categorization (e.g., minimal-risk vs. high-risk AI). Regulatory</p>	<p>Clients deploying AI must consider the level of risk posed by systems in use and tailor literacy accordingly. If using high-risk AI (e.g., for biometric identification or hiring decisions), literacy must go beyond basic understanding to include risk awareness, human oversight mechanisms, and ethical/legal</p>

		<p>assessments and adjust literacy program depth accordingly, ensuring relevant staff understand system impacts, compliance duties, and mitigation strategies. This proportional approach allows firms to allocate resources effectively while meeting legal expectations. AI literacy should also emphasize identifying, reporting, and managing risks, especially in sectors like healthcare or finance.</p>	<p>bodies should provide benchmarks and guidance on expected literacy levels tied to risk severity, including sectoral nuances. They must monitor whether firms align literacy efforts with obligations from Chapter III of the AI Act, such as robustness, accuracy, and traceability. Emphasizing a risk-calibrated approach ensures firms aren't under-training staff on high-risk systems or overburdening them in low-risk contexts.</p>	<p>implications. A one-size-fits-all training model is inadequate; clients should differentiate learning pathways for different roles and system criticalities. Applying a risk-based lens helps prioritize where deeper training is essential and ensures employees can spot misuse or escalate issues in line with regulatory expectations.</p>
<b>Training and Literacy Formats</b>	<p>Confirms flexibility in literacy approaches and formats. Formal training isn't strictly required, but passive methods like reading instructions alone are generally insufficient. Multiple learning levels are allowed based on staff expertise.</p>	<p>AI firms benefit from flexibility in how literacy is delivered—through workshops, e-learning, job aids, or mentoring. However, passive methods like documentation-only approaches are not sufficient. Programs must engage participants and be adapted to varying levels of technical knowledge and job functions. Senior engineers may need in-depth technical content, while business teams may focus more on ethical and regulatory impacts. The aim is to ensure understanding, not just exposure. Firms should also promote ongoing learning, especially in dynamic fields where AI tools evolve rapidly, and new risks emerge. This flexible but active approach strengthens compliance and staff competence.</p>	<p>Regulators should recognize diverse training approaches while setting minimum standards for literacy delivery. While formal certifications aren't required, programs must be interactive and meaningful. Regulators should issue guidance on acceptable formats and discourage superficial or checkbox approaches. Emphasis should be placed on the effectiveness of training, not just format—measured through comprehension checks, role-based relevance, and practical application. Regulators might review training content and formats during audits or inspections and should provide examples of good practice across sectors. Their oversight helps promote real-world understanding, not just procedural compliance.</p>	<p>Clients must ensure literacy formats are practical, engaging, and tailored to user roles. A compliance manual or brief memo won't suffice—active learning is needed. This could include scenario-based workshops, interactive tutorials, or AI sandbox environments. For teams interacting with high-risk AI, more intensive formats may be warranted. Clients should also offer refresher sessions as systems or legal contexts evolve. Flexible delivery allows training to be scaled across departments, locations, or outsourced teams. By diversifying formats, clients increase the likelihood of staff applying literacy to actual decision-making and oversight in AI-enabled workflows.</p>
<b>Sector-Specific Considerations</b>	<p>States there are no sector-specific literacy mandates, but context</p>	<p>Although the AI Act does not impose sector-specific literacy mandates, AI</p>	<p>Regulators should monitor whether organizations are aligning AI literacy</p>	<p>Clients in regulated sectors must tailor literacy to address both AI-specific risks</p>

	<p>such as industry and use-case relevance should guide how literacy is approached, particularly in sensitive areas like healthcare and finance.</p>	<p>firms must adapt programs based on the domain in which their systems operate. In sensitive areas like healthcare or finance, literacy should include contextual risks, regulatory overlaps (e.g., GDPR, MiFID), and sector-specific standards. Firms must ensure that sector-facing teams understand not just the technology but also how it's governed in that environment. This enables safer deployment and better client support. Failure to consider sectoral nuances may result in misaligned literacy efforts and increased exposure to legal and reputational risks.</p>	<p>efforts with sector-specific contexts, even in the absence of hard mandates. This includes working with industry regulators (e.g., data protection authorities, financial watchdogs) to identify sectoral risks and compliance challenges. By encouraging context-aware literacy, regulators help prevent overgeneralized training that misses critical nuances. Cross-sector collaboration can improve regulatory consistency and lead to tailored best practice frameworks that firms can adopt. Such efforts are particularly important where AI intersects with fundamental rights or highly regulated public services.</p>	<p>and broader regulatory obligations. For instance, healthcare providers must incorporate patient safety, data privacy, and clinical oversight into their literacy efforts. In finance, transparency, accountability, and anti-discrimination training may be emphasized. Even where the AI Act doesn't mandate sectoral specifics, clients remain responsible for contextualizing literacy. This ensures legal compliance and functional safety while maintaining trust with customers or service recipients. By aligning literacy with sectoral norms, clients improve operational integrity and reduce system misuse.</p>
<b>AI Literacy for External Parties</b>	<p>Clarifies that service providers and contractors using AI must also possess appropriate AI literacy. Contractual obligations might be warranted depending on the AI system and associated risk.</p>	<p>AI firms must ensure that contractors, vendors, and other third parties who interact with their systems possess adequate AI literacy. This includes integrating literacy expectations into procurement and vendor management practices. Where appropriate, firms should impose contractual clauses mandating training or compliance. Firms must also assess whether external parties understand system limitations and risks, particularly in client-facing or decision-making roles. Outsourcing does not absolve firms of responsibility; literacy expectations extend through the value chain. Clear guidance and ongoing communication</p>	<p>Regulators must clarify that AI literacy obligations apply to all individuals acting under the direction of providers and deployers—including external contractors. During audits or investigations, regulators may assess whether organizations have verified third-party literacy or embedded literacy clauses in contracts. Guidance may be required to help firms manage these obligations proportionally based on risk. Regulators could also develop sample contract language or checklists for evaluating third-party competence. This ensures literacy standards do not weaken when functions are outsourced or externally supported.</p>	<p>Clients using AI via third-party services must ensure those providers are AI-literate, especially when systems influence critical business decisions. Clients should conduct due diligence before procurement and may need to specify literacy requirements in contracts. For external teams managing or interpreting AI outputs, the client bears responsibility for verifying they understand system risks and compliance implications. Establishing clear expectations through onboarding, audits, or co-developed training programs helps mitigate risk and maintain accountability across shared service environments.</p>

		with third parties strengthen both regulatory compliance and operational reliability.		
<b>Practical Applications Example</b>	Covers common workplace uses of AI (e.g., ChatGPT for writing tasks) and emphasizes the need for informed use, even with human-in-the-loop systems. Experience or degrees in AI may qualify individuals as literate, provided relevance to specific systems and risks is assessed.	AI firms should ensure staff using tools like ChatGPT or internal AI assistants understand the implications of relying on such systems for core business tasks. This includes recognizing when outputs require human validation, understanding biases, and distinguishing between system-generated and human-reviewed content. Experience or academic qualifications may be sufficient for literacy, but firms must verify that relevance aligns with system risk. For example, generative AI used in legal drafting warrants deeper scrutiny than basic writing support. Literacy efforts must reflect actual use cases to prevent over-reliance and misuse.	Regulators should illustrate common AI use cases to help organizations contextualize literacy requirements. For example, generative AI in content creation may raise fewer concerns than in legal or healthcare settings. Regulators must assess whether literacy initiatives equip staff to critically engage with AI outputs and apply human judgment appropriately. Practical examples help regulators communicate expectations and evaluate proportionality during compliance checks. They also serve as case studies for best practices across sectors.	Clients must train staff on practical use cases, such as using ChatGPT for content generation or analysis. While these tools may enhance efficiency, users must understand limitations, confidentiality risks, and when human intervention is needed. Staff should not blindly trust outputs or use AI in contexts where inaccuracy could cause harm. Clients must verify that degrees or experience align with the tools in use—academic AI knowledge doesn't always translate to application-specific competence. Practical literacy enables safer, more informed, and legally compliant use of everyday AI systems.
<b>Documentation and Governance</b>	No mandatory certification is required. Internal records of training and guidance suffice. No specific AI governance structure (like a GDPR DPO) is mandated, though organizations may choose to set one up.	AI firms are not required to certify AI literacy but must maintain internal records showing that training and guidance have been provided. This includes logs of training sessions, attendance, content outlines, and updates. While no specific governance role like a GDPR DPO is mandated, firms may benefit from designating AI literacy leads or integrating oversight within existing compliance structures. Governance frameworks should ensure literacy programs evolve with changing risks	Regulators will assess whether firms have adequate documentation proving AI literacy efforts. While certification isn't required, regulators may request evidence of training delivery, relevance, and effectiveness. They should encourage firms to track who has received literacy training, how often it's updated, and how it maps to risk levels. Although the AI Act doesn't require a dedicated governance body, regulators may advise firms to assign internal responsibility for monitoring and	Clients must retain internal records that demonstrate AI literacy efforts among staff, particularly for roles interacting with high-risk systems. This may include training logs, email communications, onboarding modules, or written guides. While no formal governance structure is required, appointing a responsible person or team (e.g., compliance, risk management) helps maintain oversight and continuity. Clients should ensure records reflect actual understanding—not just attendance—through quizzes, feedback, or performance metrics. These

		<p>and regulations. Proper documentation protects the firm during audits and demonstrates good-faith efforts toward compliance, even in cases of unforeseen errors or incidents involving AI misuse.</p>	<p>updating literacy programs. This ensures continuity, accountability, and responsiveness to system or legal changes. Regulators may also develop templates or documentation guidelines to promote consistency across organizations.</p>	<p>measures serve as evidence of due diligence and support legal defense if AI-related harm occurs. Well-organized documentation also ensures smooth transitions during audits or internal reviews.</p>
<b>Enforcement and Timelines</b>	<p>Outlines enforcement phases: obligations apply from 2 February 2025, with enforcement starting from 3 August 2026 by national market surveillance authorities. Penalties will follow proportionality based on the nature and gravity of non-compliance.</p>	<p>AI firms must prepare for obligations under Article 4 by 2 February 2025 and ensure full compliance by 3 August 2026, when enforcement begins. Market surveillance authorities will assess adherence, and non-compliance may result in proportionate penalties. Firms should implement literacy initiatives early to ensure coverage across departments and partners. Phased rollout plans, risk prioritization, and integration into broader compliance frameworks are essential. Proactively meeting these timelines helps avoid rushed implementation, supports operational maturity, and demonstrates regulatory readiness. Firms may also use this period to gather feedback and refine training content before enforcement begins.</p>	<p>Regulators must develop enforcement strategies before the August 2026 deadline, including risk-based inspection plans, resource allocation, and guidance for firms. They should ensure clarity on proportionality criteria—e.g., how gravity of harm, duration of non-compliance, or repeat offenses influence penalties. Public-facing communications about the timelines and compliance milestones will aid industry preparation. Regulators may also coordinate across member states and with the AI Office to ensure harmonized enforcement. Internal capacity-building is also key—regulators must train their staff to assess literacy documentation and program quality reliably and consistently.</p>	<p>Clients must comply with Article 4 by preparing staff for informed AI use before the August 2026 enforcement date. Literacy programs should be operational by early 2025, with risk-sensitive elements prioritized. Clients using third-party AI systems must still ensure internal literacy and maintain vendor accountability. Planning early reduces disruption and avoids last-minute compliance efforts. Clients should align literacy with broader AI adoption or digital transformation strategies to streamline resources. Timely compliance also reduces the risk of legal liability and operational harm from uninformed AI use, especially in customer-facing or high-stakes contexts.</p>
<b>Extraterritorial Application</b>	<p>Confirms Article 4 applies to any organization outside the EU if their AI systems are used or have effects within the EU market.</p>	<p>AI firms based outside the EU must comply with Article 4 if their systems are used within the EU or have effects on the EU market. This means foreign firms offering AI-as-a-Service or integrated AI solutions must ensure literacy among relevant personnel and partners, even if development</p>	<p>Regulators must enforce Article 4's extraterritorial reach, ensuring that non-EU entities deploying AI systems in the EU meet literacy obligations. Coordination with customs, digital platforms, and international partners will be necessary to identify and assess foreign firms under the Act's</p>	<p>Clients purchasing or using AI systems from non-EU providers must ensure those providers meet Article 4 literacy obligations if the systems impact EU users. This includes verifying that vendors have trained relevant personnel and understand EU legal standards. Contractual safeguards may be necessary</p>

		takes place elsewhere. Firms should assess which business lines fall within the AI Act's scope and implement literacy programs accordingly. Failure to comply could lead to penalties or restrictions on EU market access. Understanding extraterritorial reach is key for firms expanding globally while maintaining legal and ethical alignment.	scope. Regulators may need to offer translated guidance and outreach initiatives to help global firms comply. They must also clarify how enforcement works when jurisdictional overlaps or foreign data laws complicate compliance. Transparent enforcement of extraterritorial provisions ensures fairness for EU firms and protects EU citizens from risks posed by external actors.	to document compliance and allocate responsibility. Clients should assess the risk of relying on non-compliant foreign firms, especially if the AI is high-risk or used in regulated sectors. Understanding extraterritorial rules helps clients make informed vendor choices and maintain compliance even when sourcing AI solutions internationally.
Public vs. Private Enforcement	Explains enforcement through both national authorities (public) and potential lawsuits by affected individuals (private) in case of harm due to non-compliance.	AI firms must be aware that enforcement of Article 4 may occur through both public regulators and private lawsuits. Affected individuals could pursue claims if they suffer harm due to inadequate AI literacy among firm personnel. This dual pathway increases accountability and legal exposure, especially for high-risk use cases. Firms should ensure that their literacy programs are thorough, well-documented, and regularly updated. Legal teams should be involved in reviewing the sufficiency of training measures. Transparent communication, staff preparedness, and records of good-faith efforts are essential for defense in both regulatory and civil contexts.	Regulators must balance public enforcement with enabling affected individuals to pursue private legal remedies. They should publish clear criteria for assessing Article 4 compliance and provide public resources explaining legal rights under the AI Act. Regulators may also need to coordinate with courts when evidence of non-compliance is raised in civil suits. Their investigations may influence or support private litigation. Ensuring fair, timely, and proportionate enforcement protects individuals while encouraging proactive compliance by firms. Transparency in enforcement outcomes may also deter non-compliance and foster trust in the regulatory regime.	Clients should recognize that both regulators and individuals may enforce Article 4 compliance. This creates legal exposure if users, employees, or customers are harmed by AI system misuse or misinterpretation linked to poor literacy. Clients must implement robust programs and document their efforts to mitigate this risk. Legal teams should assess potential liability scenarios and ensure contracts, policies, and training efforts reflect compliance obligations. Public trust and legal resilience are strengthened when clients can demonstrate that personnel are informed and AI is used responsibly and transparently.
AI Office's Role and Initiatives	Describes how the AI Office supports implementation through webinars, Q&As, and the living repository. Additional guidance will	AI firms should leverage support from the AI Office, including webinars, Q&A sessions, and the living repository of literacy practices. These resources	Regulators collaborate with the AI Office to disseminate best practices, deliver public guidance, and interpret Article 4 across use cases. They may	Clients can benefit from the AI Office's resources, especially SMEs or public sector bodies with limited internal expertise. Webinars, toolkits, and

	<p>come from national authorities. The Commission is also taking internal steps to ensure AI literacy among its own staff.</p>	<p>can guide program design, clarify expectations, and offer benchmarking examples. Firms may also engage directly with the AI Office for clarifications or to contribute to shared resources. Staying aligned with these initiatives ensures up-to-date literacy strategies and supports smoother interactions with regulators. Participating in collaborative activities with the AI Office also signals industry leadership and enhances internal training quality by drawing from vetted, evolving content.</p>	<p>draw on the Office's repository to shape national training standards or issue regulatory clarifications. The AI Office acts as a harmonizing body, reducing interpretation inconsistencies across member states. Regulators should participate in webinars and co-develop resources to ensure their guidance remains current and effective. Active collaboration helps bridge the gap between legislative text and practical enforcement, improving both compliance outcomes and public confidence.</p>	<p>example training programs support literacy implementation without requiring large budgets. Clients may also consult the Office's living repository to model their programs on peer practices and avoid compliance pitfalls. Engaging with the AI Office helps clients stay informed, refine their understanding of Article 4, and meet obligations efficiently. Leveraging these public resources is a cost-effective way to build competence, particularly when deploying or managing high-risk AI systems.</p>
Support for EU Agencies and SMEs	<p>Highlights access to shared training platforms and initiatives like the European Digital Innovation Hubs (EDIHs), which assist SMEs and public sector bodies with AI adoption and literacy efforts.</p>	<p>AI firms, especially small and medium enterprises (SMEs), benefit from initiatives such as the European Digital Innovation Hubs (EDIHs), which offer free or subsidized training, tools, and guidance on AI literacy. These resources reduce the cost and complexity of compliance with Article 4. SMEs should actively engage with EDIHs to tailor literacy programs to their specific risk levels and staff needs. Participation can also offer networking opportunities and practical toolkits. For larger firms, collaboration with EDIHs can support ecosystem partners and ensure aligned literacy standards across supply chains, especially when subcontracting or co-developing AI solutions.</p>	<p>Regulators play a critical role in directing SMEs and EU agencies to available support mechanisms like EDIHs and Commission-led training platforms. They should help disseminate information about these resources, clarify eligibility, and promote their integration into compliance planning. Regulators may also collaborate with EDIHs to develop region-specific literacy materials or offer technical support to public bodies. Ensuring equal access to literacy tools across firm sizes and geographies helps close compliance gaps and reduces regulatory burdens, especially for resource-constrained actors. Regulators must ensure support programs are inclusive, up-to-date, and aligned with enforcement timelines.</p>	<p>Clients that are SMEs or public bodies should actively leverage EU support mechanisms such as EDIHs and shared training platforms to meet their Article 4 obligations. These programs offer practical, scalable solutions for improving AI literacy without requiring major investments. Clients can request tailored workshops, access online learning materials, and consult with experts on high-risk AI use cases. Larger clients working with smaller partners or subcontractors should encourage or mandate the use of such support resources to ensure consistent literacy across the value chain. Utilizing EU-backed platforms also signals a proactive compliance stance to regulators.</p>

<b>Living Repository and Collaboration</b>	<p>Details the living repository as a central resource for AI literacy practices. Encourages stakeholders, including industry, to share initiatives. Practices are reviewed for transparency before publication but are not formally endorsed.</p>	<p>AI firms are encouraged to use the AI Office's living repository to access, contribute, and benchmark AI literacy practices. Sharing examples—such as training modules, risk-specific case studies, or sectoral guidance—helps build industry-wide understanding and improve the quality of literacy programs. While contributions aren't formally endorsed, they are vetted for transparency, enhancing credibility. Firms benefit from peer insights and can adapt proven approaches rather than creating content from scratch. Active participation also boosts reputational capital, demonstrates regulatory engagement, and helps firms stay aligned with evolving interpretations and best practices related to Article 4.</p>	<p>Regulators should promote the living repository as a central hub for Article 4 literacy practices. They can use it to assess the maturity of firm programs, guide compliance outreach, and identify common gaps or trends. Encouraging regulated entities to contribute fosters a collaborative compliance culture. Regulators may also collaborate with the AI Office to expand repository content and improve accessibility. The repository provides a flexible, dynamic complement to static regulatory guidance and allows for faster adaptation as AI systems, risks, and societal expectations evolve. It also supports consistent enforcement by offering a shared reference point.</p>	<p>Clients can use the living repository to model their AI literacy efforts on tried and tested examples. This is especially valuable for smaller organizations or those in regulated sectors looking for practical, risk-sensitive training strategies. Clients should check the repository regularly for updates and consider contributing anonymized summaries of their literacy programs to support industry-wide learning. While entries are not officially endorsed, the repository provides a vetted and practical foundation for compliance planning. Engaging with this resource enhances internal program credibility and ensures that clients' literacy efforts reflect broader industry standards.</p>
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The background features a glowing green circuit board with a central glowing node. The circuit board is shaped like a human head, with glowing nodes representing brain activity. The overall aesthetic is futuristic and technological.

# Calls to Action



## Establish an AI Literacy Policy

Design and launch an AI literacy policy aligned with Article 3(56), covering knowledge, skills, and awareness of AI opportunities, risks, and potential harm.



## Identify and Map Target Groups

Map all internal and external actors (employees, contractors, vendors) who interact with AI systems and include them in literacy efforts based on their role and exposure.



## Develop Core Literacy Modules

Create baseline training content covering AI fundamentals, organizational responsibilities, risks, and legal/ethical implications tailored to different roles and knowledge levels.



## Apply a Risk-Based Training Approach

Develop a tiered literacy program that adjusts depth and complexity of training based on the risk level of the AI systems used (especially high-risk systems).

# Conclusion

The AI literacy requirements under the EU AI Act represent a transformative step towards ensuring that AI is deployed responsibly, ethically, and safely across industries. By mandating that AI providers and deployers ensure sufficient AI literacy, the Act fosters an environment where informed decisions and accountable use of AI technologies become the norm. This approach shifts the focus from merely meeting regulatory requirements to actively promoting awareness, understanding, and the ethical application of AI throughout the lifecycle of its deployment.

Throughout this report, we have highlighted the key strategies for embedding AI literacy within organizations—emphasizing the importance of tailored training, ongoing education, and risk-based approaches to literacy. When implemented effectively, these measures ensure that all individuals interacting with AI systems possess the necessary knowledge to identify risks, ensure compliance, and uphold legal and ethical standards. By prioritizing AI literacy, organizations not only mitigate the potential for errors and misuses but also strengthen their overall AI governance and foster a culture of transparency and accountability.

However, achieving compliance with the AI literacy requirements is not without challenges. It demands commitment to building robust governance structures that integrate literacy across all levels, from technical teams to compliance officers.

For smaller organizations or those new to AI, these challenges may be particularly pronounced, necessitating targeted support, guidance, and collaboration with regulators, industry bodies, and civil society.

Despite these hurdles, leading organizations are already showcasing the advantages of proactively integrating AI literacy into their operations. By doing so, they enhance the trustworthiness of their AI systems, align with the EU's regulatory framework, and position themselves as ethical leaders in a rapidly evolving market. As AI adoption continues to spread across various sectors—from healthcare and finance to public safety and education—the imperative for strong AI literacy becomes even clearer. It provides a safeguard to ensure that AI advancements proceed in a way that upholds human dignity, rights, and privacy.

In conclusion, by embracing and adhering to the AI literacy framework established by the AI Act, organizations can not only protect individuals and communities within the EU but also set a global standard for responsible AI development and deployment.

# Appendix A: Expert Vignette



**Giannis Tolios**  
*Freelance Data Scientist*

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*The modern world is increasingly shaped by artificial intelligence, with deep learning models being widely used in science, business and education. AI literacy is a fundamental skill in this landscape, as citizens need to understand both the benefits and risks associated with the technology. Article 4 of the AI Act ensures that companies provide appropriate training regarding AI literacy of their staff.”*

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## Biography

**Giannis Tolios.** As an experienced data scientist and researcher, Giannis is passionate about statistics, data visualization and machine learning. Giannis is also particularly interested in utilizing data science to mitigate climate change, and helping to accomplish the UN Sustainable Development Goals. This personal aspiration has been achieved by participating in research projects about climate change mitigation, such as DIAMOND and IAM-COMPACT. Giannis' significant experience as a freelancer, has also given him the opportunity to collaborate with companies from all over the world, and acquire valuable experience, as well as a diverse skill set.

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