# Comprehensive EU AI Act Compliance Implementation Plan for SGH Group

## **Executive Summary:**

This document outlines a comprehensive approach for implementing EU AI Act compliance across the SGH Group (SGH Service GmbH) operations. Based on the company's focus on technical and consulting services, this plan addresses the AI systems utilized within the organization, establishes proper governance frameworks, and creates a roadmap for compliance aligned with EU AI Act implementation deadlines.

## **1. Inventory of AI Systems Within SGH Group**

### **General Office Productivity AI Tools:**

* ChatGPT: Used across departments for content generation, customer communications, and administrative tasks
* Microsoft Copilot: Integrated into Microsoft 365 applications for document creation, data analysis, and workflow automation
* Adobe Creative Suite AI: Tools used for design, marketing materials, and content creation
* Odoo AI Capabilities: Business intelligence, CRM automation, and predictive analytics for business operations

### **Business-Specific AI Applications:**

* Technical Service Management AI: Any algorithms used for service scheduling, resource allocation, or predictive maintenance
* Customer Service AI: Chatbots, automated response systems, or customer interaction analysis tools
* Business Intelligence Tools: Data analysis and reporting systems with AI/ML components
* Project Management AI: Any predictive tools for project timelines, resource allocation, or risk assessment

### **Administrative AI Systems:**

* HR Recruitment Tools: Any AI used in CV screening or candidate assessment
* Financial Analysis Tools: Forecasting, anomaly detection, or automated reporting systems
* Operational Optimization: Any AI systems used to optimize business processes or workflows

## **2. High-Risk AI Applications Assessment**

### **Methodology for High-Risk Classification:**

Each AI system will be assessed against the EU AI Act's classification criteria:

1. Article 6(1): AI systems used as safety components or products covered by EU harmonization laws
2. Article 6(2): AI systems falling under specific use cases in Annex III

### **Potentially High-Risk Systems:**

| AI System | Risk Classification | Justification |
| --- | --- | --- |
| HR Recruitment AI | Potentially High Risk | Falls under Annex III if used for employee evaluation, hiring decisions, or promotions |
| Customer Service AI | Likely Low Risk | Generally not high-risk unless determining access to essential services |
| Technical Service AI | Requires Assessment | Could be high-risk if used for critical infrastructure management |
| Financial Analysis AI | Requires Assessment | Could be high-risk if used for credit scoring or access to essential services |

### **Low-Risk Systems (Likely):**

* General productivity tools (Copilot, ChatGPT for content drafting)
* Adobe Creative Suite AI features
* Basic business intelligence reporting
* Standard project management AI features

## **3. AI Literacy Training Program**

### **Core AI Literacy Curriculum (All Staff):**

* Module 1: AI Fundamentals
  + What is AI and how does it work?
  + Capabilities and limitations of current AI systems
  + Recognizing AI-generated content
  + Ethical considerations in AI usage
* Module 2: SGH AI Tools Orientation
  + Introduction to AI tools used within SGH
  + Appropriate use cases and limitations
  + Data privacy considerations
  + Reporting issues and concerns
* Module 3: EU AI Act Essentials
  + Regulatory framework overview
  + Risk categories and compliance requirements
  + Individual responsibilities
  + Incident reporting procedures

### **Role-Based Advanced Training:**

#### **Technical Service Teams:**

* Understanding AI limitations in technical applications
* Human oversight requirements for AI-assisted decisions
* Quality control for AI-generated recommendations
* Technical documentation requirements

#### **IT and Development Teams:**

* Technical compliance requirements implementation
* Documentation and record-keeping obligations
* Risk management frameworks for AI systems
* Testing and validation methodologies

#### **Management and Leadership:**

* Strategic implications of the EU AI Act
* Governance structures and oversight responsibilities
* Risk management and liability considerations
* Resource allocation for compliance activities

#### **HR and Administration:**

* Compliant use of AI in recruitment and talent management
* Employee monitoring considerations
* Documentation requirements for AI-assisted decisions
* Training program management

### **Training Delivery Methods:**

* E-learning modules with completion tracking
* Department-specific workshops with practical exercises
* Regular refresher sessions as regulations evolve
* Train-the-trainer program for department champions

## **4. Compliance Implementation Roadmap**

### **Phase 1: Foundation (April-July 2025)**

#### **Governance Establishment:**

* Appoint AI Governance Committee with cross-functional representation
* Define roles and responsibilities for compliance oversight
* Establish reporting mechanisms and escalation procedures
* Create AI policy framework and usage guidelines

#### **Complete System Inventory:**

* Document all AI systems using standardized assessment template
* Gather technical documentation from vendors
* Interview system owners to understand implementation details
* Create centralized AI system registry

#### **Initial Risk Assessments:**

* Apply EU AI Act classification framework to all identified systems
* Prioritize potential high-risk systems for detailed assessment
* Document initial classification justifications
* Review results with legal counsel

#### **Baseline Training Development:**

* Design core AI literacy curriculum for all staff
* Develop role-specific training modules
* Create training tracking and documentation system
* Pilot training with representative user groups

### **Phase 2: High-Risk System Compliance (August 2025-February 2026)**

#### **Technical Documentation Enhancement:**

* Develop comprehensive technical documentation for any high-risk systems
* Implement logging capabilities for system outputs and decisions
* Create risk management documentation per Article 9 requirements
* Establish testing and validation procedures

#### **Vendor Management:**

* Assess vendor compliance capabilities and plans
* Negotiate updated contracts with compliance obligations
* Document shared responsibilities
* Establish ongoing compliance monitoring

#### **Human Oversight Implementation:**

* Design and document human oversight mechanisms
* Implement override capabilities for high-risk systems
* Create standard operating procedures for human review
* Train staff on oversight responsibilities

#### **Data Governance Implementation:**

* Establish data quality standards for AI training data
* Implement bias detection and mitigation processes
* Create data documentation procedures
* Develop testing protocols for data representativeness

### **Phase 3: Organization-Wide Implementation (March-December 2026)**

#### **Full Training Rollout:**

* Deploy core AI literacy training to all staff
* Conduct role-specific advanced training
* Implement training verification and documentation
* Establish ongoing training requirements

#### **Conformity Assessments:**

* Conduct internal conformity assessments for high-risk systems
* Address any identified compliance gaps
* Prepare for external assessments where required
* Document assessment results

#### **Transparency Implementation:**

* Deploy system explanations and user instructions
* Implement AI disclosure requirements for customer-facing systems
* Create transparency documentation
* Train staff on communicating about AI systems

#### **Registration and Documentation:**

* Register high-risk systems in EU database
* Finalize all technical documentation
* Complete EU declarations of conformity
* Establish document maintenance procedures

### **Phase 4: Ongoing Compliance (January 2027 onward)**

#### **Monitoring System:**

* Implement post-market monitoring for all high-risk systems
* Create incident detection mechanisms
* Develop response protocols for compliance issues
* Establish periodic compliance reviews

#### **Continuous Improvement:**

* Regular reassessment of AI systems against evolving regulations
* Update training based on implementation lessons
* Refine governance processes
* Incorporate industry best practices

## **5. Implementation Timeline and Key Milestones**

### **Immediate Actions (April-May 2025):**

* Appoint AI Governance Committee
* Begin system inventory process
* Develop initial training materials
* Complete high-risk system identification

### **Critical Deadline: February 2, 2025:**

* Complete AI literacy training for staff working with AI systems
* Ensure compliance with prohibited AI practices

### **Critical Deadline: August 2, 2025:**

* Implement requirements for general-purpose AI models
* Establish governance structures for ongoing compliance

### **Critical Deadline: August 2, 2026:**

* Complete full compliance for high-risk AI systems
* Finalize all technical documentation
* Register systems in EU database
* Complete training for all staff

### **Critical Deadline: August 2, 2027:**

* Ensure compliance for any remaining high-risk AI systems embedded in products
* Complete full integration of compliance into operational processes

## **6. Resource Requirements**

### **Personnel Resources:**

* AI compliance coordinator (could be part-time role for existing staff)
* Technical documentation support (1 FTE or external consultant)
* Training development and delivery resources
* Legal expertise for compliance validation (external or internal)
* Department-specific compliance champions (part-time allocation)

### **Technology Investments:**

* AI inventory and monitoring tools
* Training management system with compliance tracking
* Technical documentation management solution
* Risk assessment and management tools

## **7. Technical Service Business Considerations**

Given SGH's focus on technical services, special attention should be paid to:

### **Service Delivery AI Applications:**

* Assessment of any AI used in client-facing services
* Transparency requirements for AI-assisted service delivery
* Documentation of AI limitations for technical applications
* Client communication regarding AI usage in service delivery

### **B2B Applications and Shared Responsibility:**

* Clear delineation of compliance responsibilities between SGH and clients
* Contractual provisions for AI systems used in service delivery
* Documentation of downstream client obligations for shared AI systems
* Training for account managers on communicating compliance requirements

### **Industry-Specific Risk Factors:**

* Assessment of AI applications used in different client industries
* Identification of higher-risk deployments based on client sector
* Additional compliance measures for AI used in critical infrastructure services
* Sector-specific documentation and transparency requirements

## **8. Next Steps and Recommendations**

### **Immediate Actions (Next 30 Days):**

1. Establish governance structure: Appoint AI Governance Committee members
2. Launch inventory process: Begin comprehensive documentation of all AI systems
3. Initiate training development: Start creating core AI literacy training materials
4. Engage with vendors: Contact key AI system providers about compliance plans

### **Strategic Recommendations:**

1. Risk-based prioritization: Focus initial efforts on highest-risk systems
2. Integration with existing compliance: Align AI compliance with existing frameworks (e.g., GDPR)
3. Vendor collaboration: Work closely with major vendors (Microsoft, Adobe, Odoo) on compliance
4. Documentation emphasis: Prioritize thorough documentation of all AI systems and their use cases

## **Conclusion**

This comprehensive implementation plan provides SGH Group with a clear roadmap to achieve and maintain compliance with the EU AI Act while continuing to leverage AI tools for enhanced business operations. The phased approach allows for methodical implementation while prioritizing the most critical compliance elements based on regulatory deadlines.

I am available to discuss any aspect of this implementation plan in more detail and can provide additional guidance on specific components as needed.