

EU AI Act Article 50 Compliance Checklist

ACTION REQUIRED BY 2 AUGUST 2026

Article 50 takes effect **this Sunday, 2 August 2026**. Score a YES for each of the ten items. Any NO is an action required before midnight Sunday.

WHAT ARTICLE 50 ACTUALLY REQUIRES

Understand scope before auditing — not everything in the EU AI Act applies yet.

OBLIGATION	IN FORCE	APPLIES TO
Disclose when users interact with an AI system (chatbots, virtual assistants)	2 Aug 2026	All AI-powered chat and voice interfaces visible to EU users
Machine-readable watermark or label for AI-generated content that could mislead the public	2 Aug 2026	New AI-generated images, video, text and audio deployed after 2 Aug 2026
Same watermarking obligation for AI systems already on the EU market before 2 Aug 2026	2 Dec 2026 grace period	Generative AI systems deployed before 2 Aug — a four-month window to implement
High-risk AI system obligations (Annex III: employment, credit, education AI)	2 Dec 2027 deferred	Deferred by the EU AI Act Omnibus adopted 29 June 2026 — not required yet

SECTION 1 AI chatbots and virtual assistants

Any AI system your users interact with in a conversational interface — website, app, customer service, social.

01 Audit — have you identified every AI-powered conversational interface visible to EU users?

Include website chatbots, customer service bots, in-app assistants, voice interfaces, social media DM automation, and any third-party tool with a conversational AI layer embedded in your experience.

Don't limit this to tools your team built — include anything operated by agencies or vendors on your behalf.

AUDIT FIRST☐ YES ☐ NO

02 Disclosure — does each interface tell users they are interacting with an AI, before or at the start of the interaction?

IN FORCE 2 AUG

The disclosure must be clear and timely. "Powered by AI" in small print at the foot of a page does not satisfy the requirement — the user must be informed before they engage meaningfully.

Exception: AI used for legitimate national security or law enforcement.
Essentially none of your marketing tools qualify.

☐	☐
YES	NO

03 Phrasing — is the disclosure clear in the user's language, not buried in T&Cs or coded in technical language?

LANGUAGE

Suggested minimum: "You are chatting with an AI assistant. Say 'agent' or click here to speak with a person." The test is intelligibility to a non-technical user, not legal comprehensiveness.

If your chatbot hands over between AI and human agents mid-conversation, that transition must also be disclosed.

☐	☐
YES	NO

04 Documentation — is the disclosure requirement recorded in your AI governance log with the date of implementation?

EVIDENCE

In a regulatory inquiry you need to demonstrate when compliance was implemented, not merely assert that it was. A dated internal record is the minimum.

Note which specific tools are covered, and which team or vendor maintains the disclosure.

☐	☐
YES	NO

SECTION 2

AI-generated content: new deployments

AI-generated images, video, audio and text deployed to EU audiences after 2 August 2026.

05 Inventory — have you listed every content format your team produces with generative AI tools?

INVENTORY

Include AI-generated product images, lifestyle photography, social content, video scripts narrated by AI voice, synthetic spokesperson video, and AI-written editorial published under your brand.

If the content is AI-generated and could mislead the public about its nature or origin, Article 50 applies.

☐	☐
YES	NO

06 Watermarking — do the AI tools generating your content support C2PA-compliant or equivalent machine-readable watermarking?

TECHNICAL

Adobe Firefly, Midjourney and several major generative video tools support C2PA metadata. Check whether your specific tools and versions have it enabled — it is not always on by default.

If your tools do not support watermarking, this is an urgent vendor conversation. Interim option: visible disclosure labels until watermarking lands.

☐	☐
YES	NO

07 Labelling — is there a visible disclosure on AI-generated content served to EU audiences where watermarking alone is not sufficient?

Machine-readable watermarking satisfies the technical requirement, but visible labels are best practice and may be required by platform policy independently. "Created with AI" in the caption or beside the asset is the minimum.

Applies to paid and organic alike. Platform AI-label features satisfy some, but not all, requirements.

VISIBLE LABEL

☐	☐
YES	NO

08 Agency confirmation — have your creative and media agencies confirmed that AI-generated work produced on your behalf from 2 August will carry the required disclosures?

Your agency's compliance gap is your liability exposure. If an agency produces AI-generated content for your account without required watermarking or disclosure, the content carries your brand name.

An agency AI governance brief, issued and countersigned, is the cleanest way to close this.

SUPPLY CHAIN

☐	☐
YES	NO

SECTION 3

Existing tools: grace period to 2 December 2026

AI systems already deployed to EU markets before 2 August have until 2 December to implement watermarking.

09 Have you identified which generative AI tools were already in use in your EU-facing workflows before 2 August?

These tools have until 2 December 2026 under the grace period. New content formats or new tool deployments after 2 August do not qualify — they must comply immediately.

Document each tool's "in use before 2 August" status now, while it can be verified. Do not rely on memory in December.

DOCUMENT NOW

☐	☐
YES	NO

10 Is there a 2 December 2026 watermarking implementation date in someone's calendar, with a named owner?

Grace periods expire. The difference between a compliance team with a December plan and one without is a regulatory action in Q1 2027.

Assign the December deadline to a named person today, not at the end of Q3.

DEC DEADLINE

☐	☐
YES	NO

SECTION 4

What you do **not** need to do by 2 August

The EU AI Act Omnibus adopted 29 June 2026 deferred these obligations — action required later, not this weekend.

OBLIGATION	ORIGINAL	NEW DEADLINE
Annex III high-risk AI obligations (employment, education, credit scoring, housing AI)	2-Aug-2026	2 Dec 2027
Bias audits and conformity assessments for high-risk AI systems	2-Aug-2026	2 Dec 2027
Technical documentation for general-purpose AI models above capability thresholds	2-Aug-2026	2 Dec 2027

YOUR COMPLIANCE SCORE		
SCORE	STATUS	ACTION
9–10	Compliant for 2 August	Document, assign the December deadline, brief your agencies.
6–8	Partial — gaps remain	Identify the NOs and assign owners today. Most gaps can be closed over the weekend.
<6	Significant exposure	Escalate to legal immediately. Prioritise chatbot disclosure (items 01–04) — the most visible and most enforced obligation.

Next step. Bring your completed score to your next executive review with a named owner against every NO, and confirm the December watermarking date is in a calendar before you leave the room. Ethicore Advisors can supply the agency governance brief and disclosure language library — ethicoreadvisors.com.