

EU AI Act Transparency Guide

A practical, premium-format briefing on Articles 13 and 50, transparency triggers, deadlines, penalties, and a 90-day action plan.



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Last updated 27 March 2026: All deadlines, regulations, and enforcement timelines reflect the current March 2026 status. The high-risk AI transparency deadline of 2 August 2026 is approaching rapidly.

This uplifted edition is based on the user-provided Acrobat PDF export of the LAWCIS transparency guide and re-packaged for cleaner reading and download use.

Executive Summary

The EU AI Act transparency framework is not a single obligation. It combines provider documentation duties for high-risk AI, transparency duties for GPAI model providers, and direct disclosure rules for chatbots, synthetic content, deepfakes, emotion recognition, and biometric categorisation systems.

Requirement	Who it applies to	Deadline	Key action
Article 13 - High-risk AI transparency	Providers of high-risk AI systems	2 Aug 2026	Provide instructions for use and related technical documentation for deployers
Article 50(1) - AI interaction disclosure	Providers of chatbots, virtual assistants, and similar interactive systems	In effect	Inform users they are interacting with AI unless obvious from context
Article 50(2) - AI content marking	Providers of generative AI systems	In effect	Mark synthetic outputs in a machine-readable and detectable format
Article 50(3) - Emotion recognition / biometric categorisation	Deployers using such systems	In effect	Inform exposed persons that the system is operating
Article 50(4) - Deepfake disclosure	Deployers generating or manipulating image, audio, or video content	In effect	Disclose that content is artificially generated or manipulated

Immediate takeaways

- Article 50 transparency duties are already in effect.
- Article 13 documentation for high-risk AI becomes critical on 2 August 2026.
- The most common failure point is late documentation and weak user-facing disclosure design.
- Compliance work should begin before launch, not shortly before the deadline.

What Transparency Means Under the EU AI Act

The guide explains transparency as a combination of traceability, explainability, and disclosure. In practical terms, users, deployers, authorities, and affected persons must be able to understand when AI is involved, how it should be used, and what its limits are.

Dimension	What it means in practice
Traceability	Systems should log relevant operations so post-hoc review is possible and investigators can see what happened, when, and on what basis.
Explainability	Deployers need usable information on how to interpret outputs, understand limitations, and apply appropriate human oversight.
Disclosure	Natural persons must know when they are interacting with AI or exposed to AI-generated or AI-manipulated content, with enough clarity to exercise their rights.

Three Categories of Requirements

Category	Applies to	Core obligation
High-risk AI systems (Article 13)	Providers of AI systems classified as high-risk under Annex III	Design and document the system so deployers can interpret outputs and use the system appropriately; provide instructions for use and related information.
General-purpose AI models	Providers of GPAI / foundation models	Prepare technical documentation, provide information to downstream providers, and supply a sufficiently detailed summary of training content and data.
General transparency rules (Article 50)	Relevant providers and deployers regardless of risk classification	Provide direct disclosure where systems interact with people, create synthetic content, or use deepfake, biometric, or emotion-recognition functions.

Article 13 documentation elements highlighted in the source guide include provider identity, system characteristics and limitations, intended purpose, accuracy and robustness levels, foreseeable performance constraints, human oversight measures, input data specifications, log collection, maintenance needs, and expected system lifetime.

General Transparency Rules (Article 50)

Rule	Trigger	Operational standard
Article 50(1) - AI interaction disclosure	A system is intended to interact directly with natural persons	Users must be told they are interacting with AI at the latest at the first interaction, unless this is obvious from the circumstances.
Article 50(2) - AI content marking	A system generates synthetic audio, image, video, or text	Outputs should be marked in a machine-readable and detectable format as artificially generated or manipulated.
Article 50(3) - Emotion recognition / biometric categorisation	A deployer uses these systems in practice	Exposed persons must be informed that the system is operating.
Article 50(4) - Deepfake disclosure	AI generates or manipulates image, audio, or video content that constitutes a deepfake	Artificial generation or manipulation must be disclosed.

Enforcement Timeline and Deadlines

Date	Requirement	Status
1 August 2024	EU AI Act enters into force	Complete
2 February 2025	Prohibited AI practices enforceable	In effect
2 August 2025	GPAI obligations and Article 50 transparency rules	In effect
2 August 2026	High-risk AI transparency (Article 13)	Critical live deadline
2 August 2027	Full high-risk system requirements	Future

Critical deadline: Organisations beginning compliance work shortly before August 2026 are unlikely to complete Article 13 documentation, testing, and deployment governance in time. The guide emphasises starting implementation well before market placement.

Penalties and Compliance Planning

Violation category	Maximum fine	Turnover-based alternative
Prohibited AI practices (Article 5)	EUR 35 million	7% of global annual turnover
High-risk AI non-compliance (Articles 9-15)	EUR 15 million	3% of global annual turnover
Incorrect or misleading information to authorities	EUR 7.5 million	1.5% of global annual turnover

10-Step Transparency Compliance Checklist

- Confirm whether each system falls within a high-risk, GPAI, or Article 50 trigger category.
- Document your risk classification analysis against the AI Act structure and Annex III where relevant.
- Design or refine system architecture so outputs can be interpreted by deployers.
- Prepare or update instructions for use with the information required by Article 13.
- Document accuracy, robustness, cybersecurity expectations, and known limitations.
- Implement or test logging so relevant operations are traceable.
- Define human oversight measures, escalation paths, and override options.
- Build AI interaction and synthetic-content disclosures into product flows.
- Test disclosures, markings, and user comprehension before launch.
- Prepare registration and conformity materials where high-risk obligations apply.

90-Day Action Plan

Phase	Focus	Core tasks
Days 1-30	Audit and classification	Inventory AI systems, classify by risk level, and identify the gap between current state and legal requirements.
Days 31-60	Documentation and implementation	Draft or update instructions for use, implement Article 50 disclosures, and deploy content-marking solutions.
Days 61-90	Testing and registration	Test transparency mechanisms with real users, complete high-risk conformity preparation, and assemble EU database registration materials.

About the Author

Olga Markova is a solicitor qualified in England & Wales with an LL.M. in Professional Legal Practice and the author of *EU AI Act Explained*. The source guide describes her practice as focused on AI regulation, data protection, and complex technology projects, with particular emphasis on the EU AI Act and GDPR.

Also referenced in the source guide

- sector-specific guidance
- GDPR and overlapping regulatory considerations
- the EU database for high-risk AI
- common mistakes to avoid
- related commentary and course materials available on LAWGIS

Disclaimer

This PDF is a polished downloadable edition derived from the user-provided Acrobat export of the LAWGIS transparency guide. It is intended as an accessible briefing format and should be read alongside the full website article and any later updates.