

AI Transparency Code Signatory Decision Brief

A 60-minute internal review path for providers and deployers considering the voluntary EU Code of Practice on Transparency of AI-generated content.

INITIAL-LIST CUT-OFF 27 JUL 2026 18:00 CEST	ARTICLE 50 APPLIES 02 AUG 2026 Relevant obligations
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Use this brief to prepare a decision, not to make one for the organisation.

Signing is voluntary. The organisation must determine scope, choose the relevant Code section or sections, appoint a sufficiently authorised signatory, complete the current official form, and submit it through the official procedure. Adherence is not conclusive evidence of compliance.

IN THE ROOM

AI / product owner	Legal or compliance	Engineering / content ops	Senior executive
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WHAT CHANGED

The Code moved from draft context to an assessed EU-wide route.

01

Adequacy confirmed
On 8 July 2026 the Commission concluded that the Code adequately covers Articles 50(2), (4), and (5). The AI Board adopted its assessment on 9 July.

02

Initial-list cut-off clarified
The official FAQ updated on 16 July sets 27 July 2026 at 18:00 CEST for inclusion in the initial signatory list. A superseded 22 July date should be removed from calendars and internal plans.

03

Later signing remains possible
Providers and deployers may in principle sign after the initial-list cut-off. The 27 July date is about initial-list inclusion, not the end of all signing.

04

Non-signatories still need an evidence route
Not signing is not itself non-compliance. Organisations that use other measures remain responsible for demonstrating how those measures meet applicable Article 50 obligations.

Do not collapse three separate decisions

1. Scope	2. Signature	3. Implementation
Which roles, systems, outputs, and Article 50 duties are relevant?	Will the organisation sign, which section, and who has authority to bind it?	What marking, detection, labelling, accessibility, logging, and evidence measures will operate?

Start from the organisation's role, then test the official scope.

SECTION 1

Providers: marking and detection

For providers of generative AI systems considering machine-readable marking and related detection commitments.

SECTION 2

Deployers: visible labelling

For deployers considering deepfake disclosure and certain AI-generated or manipulated public-interest text labelling commitments.

Five questions to answer before anyone touches the form

A

Role

Is the organisation acting as a provider, deployer, both, or a different actor for each system and workflow?

B

System and output inventory

Which generative systems, models, products, content flows, deepfakes, and public-interest publications are under review?

C

Section choice

Does the current official scope analysis point to Section 1, Section 2, or both? Individual commitments within a selected section cannot be picked separately.

D

Authority

Which senior executive has sufficient authority to bind the provider or deployer, and where is that authority recorded?

E

Evidence

Where will the organisation retain the signed form, decision record, inventory, measures, tests, approvals, and source-review date?

Finish with an owned next action, not a vague readiness score.

00-10	Map roles	Name provider/deployer roles and the systems or workflows under review.
10-20	Route sections	Record Section 1, Section 2, both, or unresolved. Link the official scope source.
20-35	Check evidence	Locate inventory, implementation owner, testing evidence, decision log, and retention path.
35-50	Confirm authority	Identify the authorised executive and the internal review or approval needed before signature.
50-60	Set the next action	Choose sign now, continue review, or use another evidence route. Assign owner and date.

Minimum decision record

☐ organisation categories ☐ systems/workflows ☐ Code section(s) ☐ decision owner ☐ authorised signatory ☐ evidence location ☐ official source review date ☐ next action and due date

OFFICIAL SOURCES	NEXT OPERATING LAYER
Code and adequacy assessment digital-strategy.ec.europa.eu/en/policies/code-practice-ai-generated-content	Free private checklist profitflow-kr.cosmocho.chatgpt.site/ai-signatory-checklist
Signing FAQ updated 16 July 2026 digital-strategy.ec.europa.eu/en/faqs/signing-code-practice-transparency-ai-generated-content	AI Transparency Launch Kit - \$39 hypothesis profitflow-kr.cosmocho.chatgpt.site/ai-transparency-kit

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