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EU AI Act

Trustworthy AI for the Digital Decade

February 2025

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Amsterdam - London - Singapore

For more information on this publication, visit https://www.ai-and-partners.com/.

About AI & Partners

'AI That You Can Trust' - Your trusted advisor for EU AI Act Compliance. Unlock the full potential of artificial intelligence while ensuring compliance with the EU AI Act by partnering with AI & Partners, a leading professional services firm. We specialise in providing comprehensive and tailored software solutions for companies subject to the EU AI Act, guiding them through the intricacies of regulatory requirements and enabling responsible and accountable AI practices. At AI & Partners, we understand the challenges and opportunities that the EU AI Act presents for organisations leveraging AI technologies. Our team of seasoned experts combines in-depth knowledge of AI systems, regulatory frameworks, and industry specific requirements to deliver strategic guidance and practical solutions that align with your business objectives.

To find out how we can help you, email contact@ai-and-partners.com or visit https://www.ai-and-partners.com.
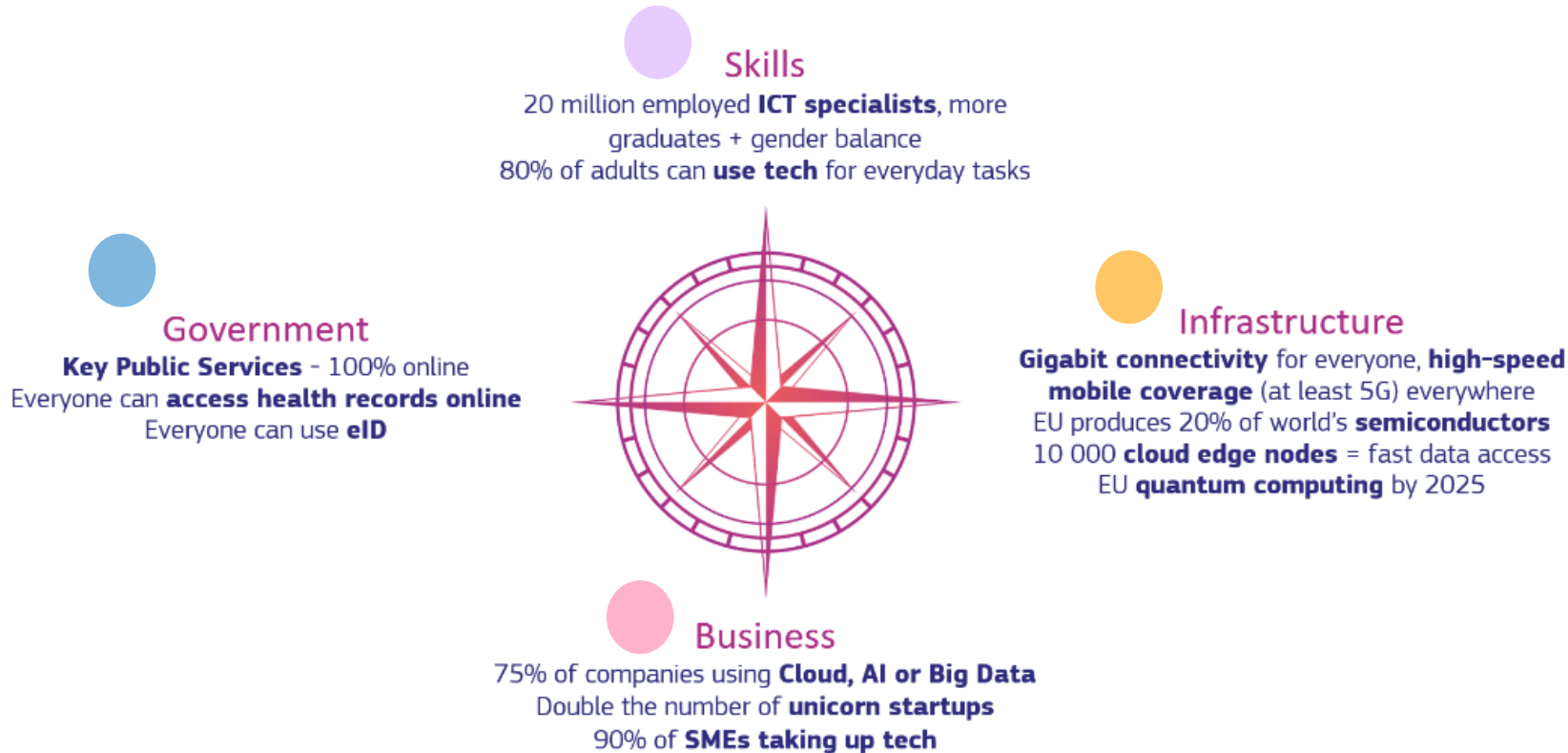
Business Integrity

AI & Partners defends and extends the digital rights of users at risk around the world. By combining direct technical support, comprehensive policy engagement, global advocacy, grassroots professional services, regulatory interventions, and participating in industry groups such as AI Commons, we fight for fundamental rights in the artificial intelligence age.

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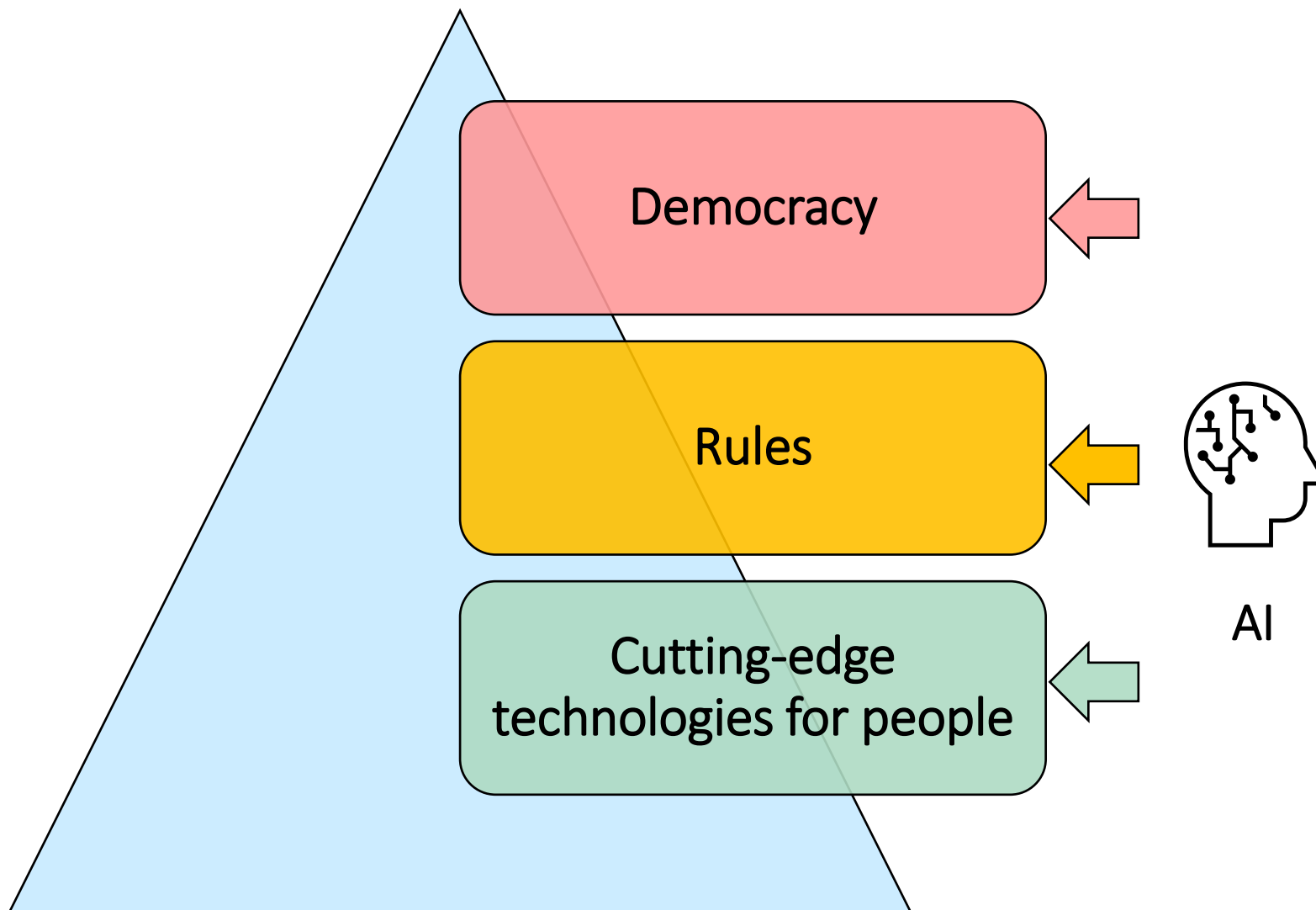
Contents

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Skills
20 million employed **ICT specialists**, more graduates + gender balance
80% of adults can **use tech** for everyday tasks

Government
Key Public Services – 100% online
Everyone can **access health records online**
Everyone can use **eID**

Infrastructure
Gigabit connectivity for everyone, **high-speed mobile coverage** (at least 5G) everywhere
EU produces 20% of world's **semiconductors**
10 000 **cloud edge nodes** = fast data access
EU **quantum computing** by 2025

Business
75% of companies using **Cloud, AI or Big Data**
Double the number of **unicorn startups**
90% of **SMEs** taking up tech

Targets and Objectives

The **Digital Decade policy programme** sets out digital ambitions for the next decade in the form of clear, concrete targets. The main goals can be summarised in 4 points:

1. *a* digitally skilled population and highly skilled digital professionals

2. *secure* and sustainable digital infrastructures

3. *digital* transformation of businesses

4. *digitalisation* of public services

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Democracy

Rules

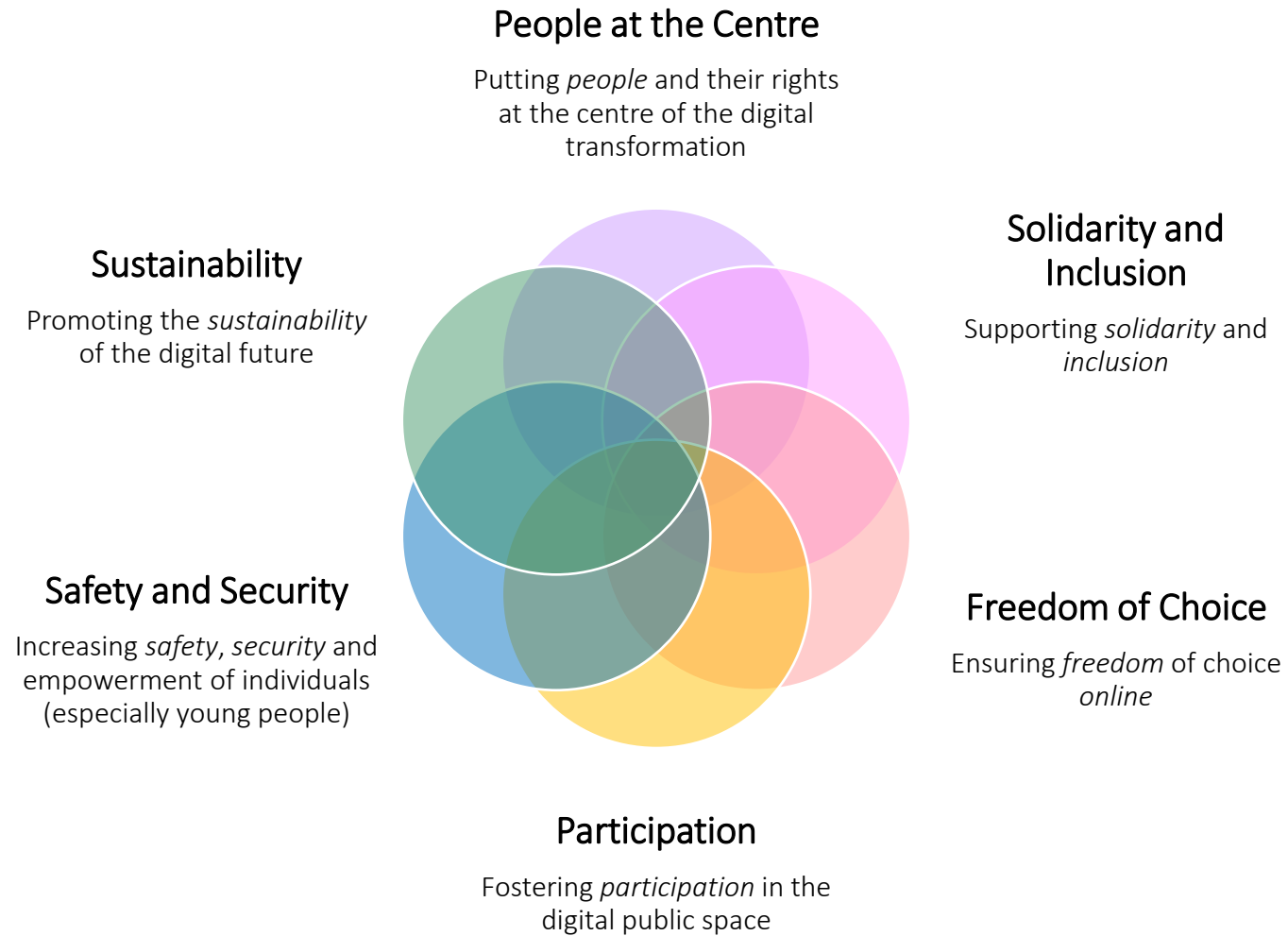Cutting-edge technologies for people

AI

Digital Decade Framework

The Digital Decade Framework is the EU's strategy to ensure technology works for people. Here's a simplified overview:

- **Targets**: Measurable goals in connectivity, digital skills, business, and public services.

- **Objectives**: Steps for Member States, with progress tracked annually.

- **Policy Programme**: EU and Member States collaborate on these targets, with yearly updates.

- **Multi-Country Projects**: Shared resources for large cross-border initiatives.

- **Digital Rights & Principles**: Ensures EU values guide the digital world, as per the Declaration on Digital Rights and Principles.

All efforts aim to make innovation beneficial for everyone.

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People at the Centre

Putting *people* and their rights at the centre of the digital transformation

Solidarity and Inclusion

Supporting *solidarity* and *inclusion*

Sustainability

Promoting the *sustainability* of the digital future

Safety and Security

Increasing *safety*, *security* and empowerment of individuals (especially young people)

Freedom of Choice

Ensuring *freedom* of choice *online*

Participation

Fostering *participation* in the digital public space

Theme	Guideline	Recital(s)	Article(s)	Supporting
People at the Centre	People at the centre	-	1, 16, 27, 58, 59	-
Solidarity and Inclusion	Solidarity and Inclusion	-	1, 10, 16, 27, 58, 95	-
	Connectivity	-	10, 58, 62	-
	Digital Education, Training and Skills	20, 56	4	-
	Fair and Just Working Conditions (A)	9, 21, 92	16, 27	-
	Fair and Just Working Conditions (B)	9, 92	26, 27	-
	Digital Public Services Online	-	27	Annex III
Freedom of Choice	Interactions with algorithms and artificial intelligence systems (A)	6	1, 4, 14, 58	-
	Interactions with algorithms and artificial intelligence systems (B)	-	1, 13, 14, 27, 50, 86	-
	A fair digital environment (A)	-	1, 13, 14, 50. 86	-
	A fair digital environment (B)	-	1, 57, 58, 62, 63	-
Participation	Participation (A)	-	1, 10, 13, 50, 95	-
	Participation (B)	9, 48, 134	2	-
	Participation (C)	-	1, 13, 50, 71	-
	Participation (D)	118, 120, 133, 134, 136	-	-
Safety and Security	A protected, safe and secure digital environment	-	10, 14, 15, 27, 50, 71, 78	-
	Privacy and individual control over data (A)	69	10, 27, 59, 78	-
	Privacy and individual control over data (B)	69	10, 59, 78	-
	Privacy and individual control over data (C)	69	10, 59, 69	-
	Protection and empowerment of children and young people in the digital environment (A)	9, 20, 48, 56	-	-
	Protection and empowerment of children and young people in the digital environment (B)	9, 48, 56	-	-
	Protection and empowerment of children and young people in the digital environment (C)	9, 48	10, 14, 15	-
Sustainability	Sustainability (A)	27, 142	58, 95, 112	-
	Sustainability (B)	-	95, 112	Annex XI

Infrastructure and Connectivity

- While the EU has made progress in fiber coverage, only 50% of the primary 5G band delivers high-quality service, requiring significant investment.
- Growth in quantum computing and HPC is promising, with the first EU quantum computer expected by 2025.

Digital Skills Development
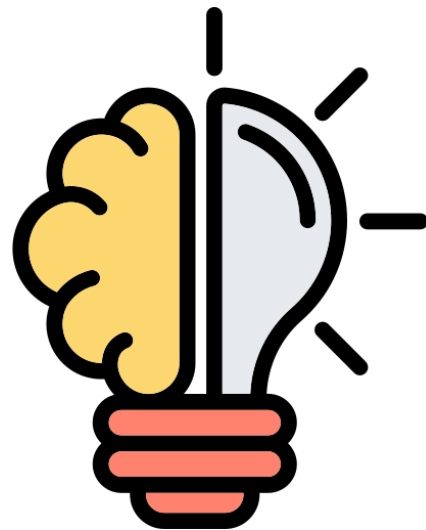
- With 55% of EU citizens having basic digital skills, the pace of progress is too slow to meet the 80% target.
- A projected shortage of 8 million ICT professionals by 2030 highlights the urgency of a robust digital workforce strategy.

Business Digital Transformation

- SMEs lag in digital adoption, particularly in cloud and AI, in both Europe and the world.
- Targeted support through grants, tax incentives, and skill-building programs is critical to fostering a competitive digital business ecosystem.

Digital Public Services
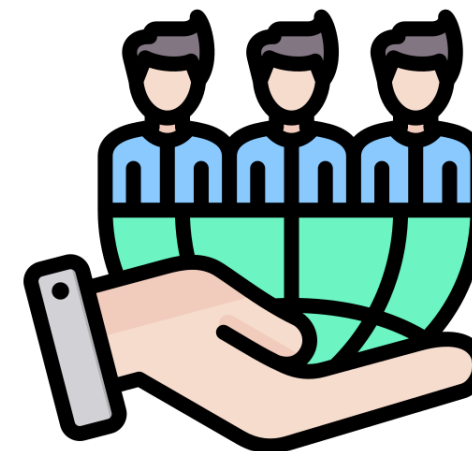
- Initiatives like eID and the European Digital Identity Wallet show promise.
- Disparities among Member States and the need for public trust and coherence in implementation remain challenges.

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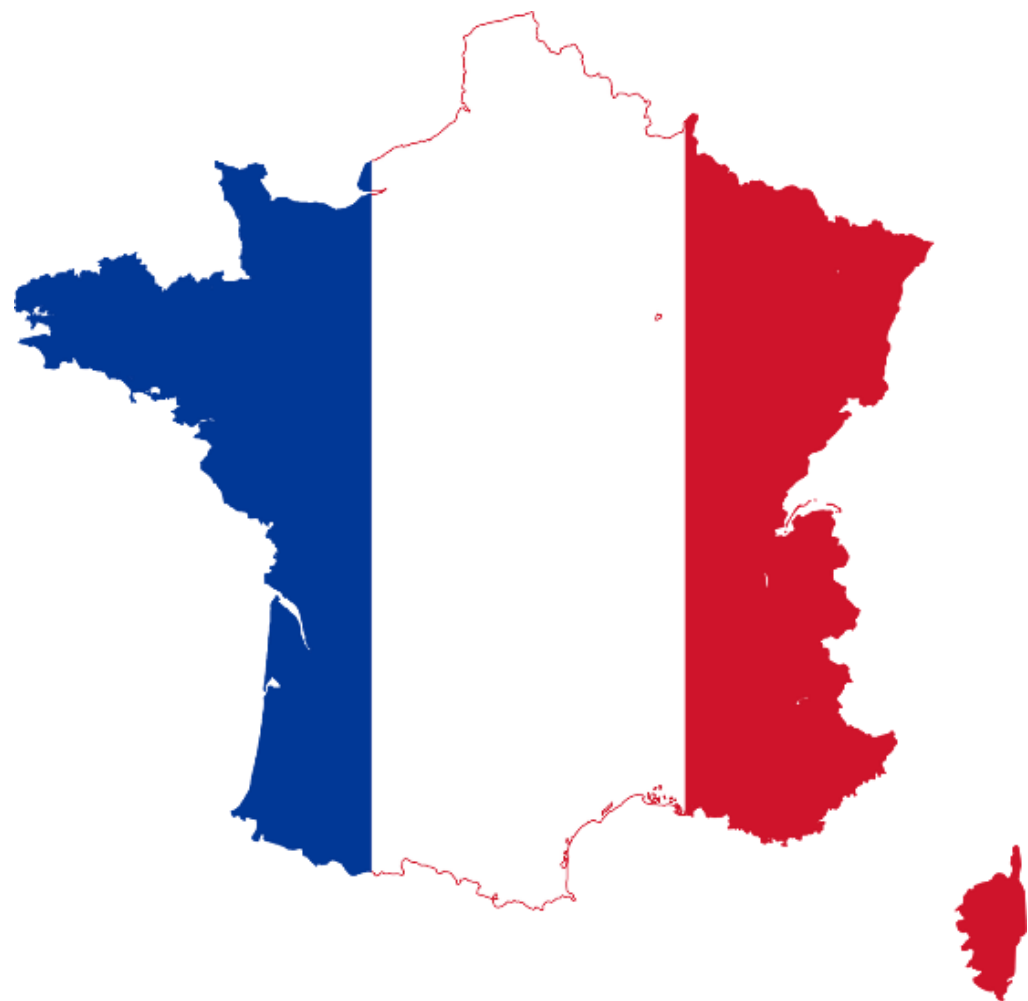
Digital Decade KPIs for AI

AI Adoption
Only 6.7% of enterprises in France use AI, far from the EU's 75% target by 2030, highlighting a need for stronger private sector support.

Cloud Services
25.3% of French businesses use cloud services, well below the 75% EU target, making cloud adoption a key focus.

Digital Skills
62% of the population has basic digital skills, lagging behind the EU's 80% target. Boosting digital literacy and promoting ICT careers, especially for youth and women, is essential.

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People at the Center

Solidarity and Inclusion

Freedom of Choice

Participation

Safety and Security

Sustainability

Alignment with digital strategies

- The **EU AI Act** aligns with other EU digital strategies, like the Digital Services Act, focusing on skills, inclusivity, and sustainability.

- This creates a unified, people-first digital ecosystem.

- It regulates AI so that citizens have greater transparency, protecting their rights and safety in digital interactions.

Opinion 1

Terms as "digital transformation" or "reliable technology", or "trustworthy AI" fall beyond the generic marketing phrases. These, in fact mark a form of an upgrade at some industries or companies, including those that are not purely technological. About a century ago our predecessors hoped for a trustworthy light bulb, where some of them feared or opposed its implementation. It was, in fact, an upgrade, which nowadays relates to something taken for granted. Some 30 years ago, part of us enjoyed a "communication transformation" – when the Internet appeared, and passed through dial-up, LAN and other wire technologies, to reach the today's wireless, touch-, voice- or face-operated environment, which is frequently found in our pockets. Well, same goes for the current generation of technology transformation – the one that brings, for example, machine-generated knowledge in a matter of seconds. The trustworthiness of this needs to be regulated (taking Europe as an example) or de-regulated – taking the most recent developments in the USA. It is a process, at which the companies need a reliable knowledge (preferably human generated), so to be able to comply and succeed. For more reliable information on the market and compliance environment, please visit www.karushkov.com

Opinion 2

Amongst the leading principles of the EU regulated AI one can recognize the human oversight. This does not oppose the digitalization yet assumes that the transformation shall not only be directed to people but also needs to be supervised by people. New (labor, operational) functions appear along with technology transformation, including the AI driven transformation – both at the end of the consumers and on the business side. A client of mine (notable TV host) recently shared their preoccupation that "the AI will erase professions like this".

The trustworthy AI needs to touch such aspects on the market – the fear - and also needs to address the issue in a manner that shall allow the fear to be replaced by the real world matters. At Karushkov Legal Solutions we assist and inform our clients on the real effects of digital transformation, including AI. For more information you can see this video that we recently uploaded - https://www.linkedin.com/posts/mitko-karushkov-3533882_productliability-artificialintelligence-ai-activity-7283469474081464321-pqte?utm_source=share&utm_medium=member_ios.

"if the market likes you, you wouldn't be erased by a software." **Karushkov**

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LEGAL SOLUTIONS

3. Understanding the Digital Rights and Principles	6. Conclusion	3. Understanding the Digital Rights and Principles
People at the Centre	-	*People at the Centre*

'Human-centricity a hallmark of an inclusive digital future'

"AI must empower society by ensuring human-centric and sustainable applications. The EU AI Act offers a crucial framework to harmonize innovation with ethical values, shaping a secure and inclusive digital future."

Patrick Orsos, *Managing Partner*, mgoIT

'Acknowledging threat of Artificial Superwisdom'

"*Instead of fearing Artificial Superintelligence, we must focus on developing Artificial Superwisdom. The ultimate goal should be not to develop intelligent systems simply but wisdom-oriented systems—a "ChatGPT of wise action" that integrates rationality, intelligence, and moral insight to guide humanity toward better choices. This requires humility and a willingness to acknowledge our limitations while embracing systems capable of achieving greater wisdom than we can alone. Yes, we must fear the potential of Artificial Superintelligence, but embracing Artificial Superwisdom will help save us from ourselves!.*"

Dr. Mihaela Ulieru, *Present*, IMPACT Institute for the Digital Economy

'Data & AI Literacy support responsible AI practices'

"*For the AI Act unfolding its impact, data and AI literacy is required – rooted in knowledge about responsible AI, fused with practical experience in implementing innovative use cases that benefit organizations, businesses and society.*"

Martin Heitmann, *Guiding Teams to Success | Fostering Industry Best Practices | Enabling Innovation in Pharma & Healthcare*

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2. Understanding Europe's Digital Decade

Origins of the EU AI Act

'Effective AI governance is non-negotiable for boards'

"*Effective AI governance and robust cyber-ethics are non-negotiable for boards and C-suites, ensuring sustainable innovation, mitigating risks, and building trust. These are foundational and essential for navigating the complexities of the digital decade.*"

Prof. Ingrid Vasiliu-Feltes, MD MBA, *Founder & CEO*, Institute for Science, Entrepreneurship and Investments

3. Understanding the Digital Rights and Principles

Participation

'AI's wisdom bounded by quality of data'

"*AI integrity is not just about the technology we build, but the values we embed within it—ensuring that its purpose serves humanity with fairness, transparency, and accountability. Following these values the quality of data is the foundation of AI's wisdom, while synthetic data is the bridge that extends its possibilities—together, they shape the depth and breadth of intelligent systems and have a need to be monitored.*"

Michael Boevink, *Founder*, Boevink Group

5. Case Study: France 2024

Digital Decade KPIs for AI

'France's Hesitant Steps Toward AI and Programming Education'

"*In France, the integration of AI and programming languages into education remains limited. In middle school, no mandatory courses exist, although some schools offer optional programs. In high school, an introduction to programming languages in the first year continues only in scientific tracks, with no specific courses on AI. Overall, these skills remain marginal in curricula, relying on teachers' initiative to integrate these tools into the educational environment.*"

Dave Bohnert, *Data Analyst*, DataDave

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3. Understanding the Digital Rights and Principles

Sustainability

'Holistic infrastructure design supports long-term sustainability'

"*True AI sustainability requires holistic infrastructure design - not just efficient algorithms. Without addressing hardware lifecycles and heat reuse, we're only shifting the environmental burden.*"

David Kohnstamm, *Co-Founder and Chief Sustainability Officer*, leafcloud

3. Understanding the Digital Rights and Principles

Freedom of Choice

'Alignment with European Values critical to Ethical AI Development'

"*As a firm committed to ethical AI development, we recognize the EU AI Act as a pivotal framework. It aligns with European values such as democracy, human rights, and sustainability while ensuring the trustworthy development of AI. By categorizing risks, mandating oversight, and prohibiting harmful practices, the Act safeguards society. This comprehensive regulation establishes global standards for ethical AI, striking a balance between innovation and accountability.*"

Binesh Balan, *Managing Director*, Arkstons Advisory

2. Understanding Europe's Digital Decade

Origins of the EU AI Act

'ISO/IEC 42001:2023 Sets the gold standard for Responsible AI'

"*ISO/IEC42001 as the new gold standard to demonstrate responsible AI can support to implement and to manage the focus of human centric design of AI. With the adjustments of affected processes, they can re-organized based on principles of trustworthy AI. This strengthens our path to find trustworthy AI. AI-Auditing will help to achieve this goal.*"

Ina Schöne, *Founder*, Data Privacy and AI

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2. Understanding Europe's Digital Decade

Origins of the EU AI Act

'Value of regulation lies in protecting institutions' integrity'

"*The European Union has welcomed the use of AI but has also recognised the importance of regulating its use to safeguard the integrity of the institutions and promote ethical practices.*"

Anandaday Misshra, *Founder and Managing Partner*, AMLEGALS

3. Understanding the Digital Rights and Principles

People at the Centre

'Unbiased data is a misnomer'

"*I believe that unbiased data is a misnomer, I do not think we can prevent bias as humans are intrinsically biased and all our data comes from humans. We need to identify, classify and use bias correctly within our data. "There is no capability today to create high quality data sets for use with ethical emotional AI. There needs to be vetted businesses that can create training data for ethical usage taking real data from vulnerable classes such as children, those affected by crime etc and making it safe to use for training AI.*"

Heather Payne, *Founder & CEO*, Toast91

Thanking Our Corporate Partners For Invaluable Support

Anandaday Misshra, As a legal professional with over 27 years of experience, Anandaday Misshra specializes in data privacy, artificial intelligence, Goods and Services Tax (GST), international arbitration, international laws, and strategic dispute resolution across diverse jurisdictions. My career is dedicated to assisting organizations in navigating the complexities of legal compliance within an ever-evolving regulatory landscape.

Arno Debelle, Arno Debelle has nearly a decade of experience as a lawyer. Arno combines his legal expertise with a passion for technology and AI. After learning to code, Arno gained hands-on experience in data science, machine learning, and AI project development. This unique blend of skills allows Aarno to navigate the intersection of emerging technologies and legal compliance, creating innovative, responsible, and scalable AI solutions. Currently, Arno is focused on entrepreneurial ventures and strategic legal consulting, driving impact where law meets AI.

Charles Kerrigan, Charles is part of teams working on transactions and consulting/advisory for emtech in the UK, EMEA, and the US. He was invited to be a founding member of the UK Parliament's Advisory Group on AI in 2016, acting as legal advisor to the group, and has remained a member to the present. He has worked in AI in academic and legal contexts since 2010. At CMS he is part of the firm's specialist emerging technologies team. He works on business model and go-to-market strategies in AI; on investment and M&A in the deep tech sectors; on implementation projects to establish compliance with AI regulations and standards; on technical writing and policies; and on AI literacy projects and other institutional training. His clients include global technology firms and financial institutions; VC and other deep tech investment firms; and governments and regulators. He has recently written the worldwide AI training modules for a global bank. He is a Board Advisor of Holistic AI https://www.holisticai.com/ and Home | AI & Partners (ai-and-partners.com) He sits on the advisory boards of the Investment Association Engine The IA Engine - FinTech accelerator from The Investment Association and the All Party Parliamentary Group on Artificial Intelligence (APPG AI) APPG AI 2024.2025 Brochure (May 2024) (biginnovationcentre.com). He is the Chair of the Technology Working Group of the Association of Real Estate Funds Tech Working Group - January 2020 (aref.org.uk). He teaches on AI and entrepreneurship at UCL.

Dave Bohnert, Dave Bohnert is an expert at the intersection of clinical data management, data science, and regulatory compliance. As a Clinical Data Programmer at a leading Contract Research Organization (CRO), he ensures the quality and integrity of clinical data for global pharmaceutical and biotech research studies. His work includes programming data manipulations, integrating external data sources such as ECG and lab results, and preparing SAS datasets for regulatory submissions, including to the FDA.

David Kohnstamm, David Kohnstamm is the co-founder, resident thermodynamics expert, and Chief Sustainability Officer at Leafcloud, where his expertise in servers and thermal dynamics plays a pivotal role in shaping the company's vision and the design of Leaf sites. His work focuses on transforming server heat into a reusable resource, leveraging his background as an engineer with a passion for building and innovation. David's journey into the tech world began in engineering, building solar boats and electric bikes. He then transitioned to energy management, arriving at the intersection of IT hardware and thermal management through trialing various immersion cooling solutions. Captivated by the potential of reusing server heat on a large scale, he co-founded Leafcloud in 2019 to bring this vision to life. David's innovative approach and dedication to sustainability have not only propelled Leafcloud forward but also made him a sought-after speaker at industry events worldwide. His insights and the company's groundbreaking work have been featured in the documentary "Clouded II: Does Cloud Cost the Earth?", highlighting the environmental impacts of cloud computing. Outside of his professional endeavors, David is an avid cycle-smith, a proud father of two, and enjoys board games.

Dr. Benedikt Kohn, Dr. Benedikt Kohn is a specialist lawyer in information technology law in the technology, media and telecommunications practice group of Taylor Wessing. He has particular expertise in legal issues related to digitization and artificial intelligence. His areas of expertise include IT contract drafting, advising on complex data protection projects, and advising on the implementation of new regulatory requirements for the use of AI. Dr. Benedikt Kohn regularly publishes and speaks on the topics of digitization and AI regulation.

Dr. Theodoros Karathanasis, Dr. Theodoros Karathanasis is an independent Researcher and Consultant on legal and regulatory implications of AI and member of the cyber experts networks the European Centre of Excellence for Combating Hybrid Threats (HybridCoE), as well as the EU CyberNet.

Martin Heitmann, Martin Heitmann is a trained business mathematician, holding BSc and MSc from the University of Mannheim. Serving in a consultant role for close to a decade, he supported organizations in the finance and Life Sciences sector to develop robust and effective AI systems. Now with a healthcare and Life Sciences focus, he serves in various community leadership roles in collaboration with organizations globally to enable safe innovation.

Michael Boevink, Michael Boevink has more than 20 years management experience in the fintech and banking industry and is founder of his own investment company Boevink Group. Mr. Boevink specialises in capital raising, scaling and executing go-to-market strategies and business development growth in global markets and is engaged in companies as Raimac Financial Technology - Raimac.io - a programmable payment solution. He holds an MBA from the University of Bradford.

Mihaela Ulieru, Mihaela Ulieru is the Founder and President of IMPACT Institute for the Digital Economy. Working with governments, international institutions, civil society and private sector partners to mitigate global challenges by using digital technologies as an integrated component of policy making. Builds major programs leading the scaling-up of operations through strategic partnerships and networks: Industrial Informatics, Future of Medicine, Self-Organizing Security, EnergyWeb, Global Manufacturing Systems, Sustainable Personal Living Technologies, Organic Governance. Creates new solutions, markets and revenue securing large-scale funding from a variety of public and private sources to improve quality of life and global sustainability through technology development and accessibility. Appointed to numerous boards of which: the Science Technology and Innovation Council of Canada; ASTAR Singapore and SimTech Manufacturing Institute; IEEE-Industrial Electronics Society; the European Commission Future and Emerging Technologies Directorate and EC Innovative Production and Machines Manufacturing Network of Excellence; US NSF. Member, Global Agenda Council on Data Driven Development. Awarded Canada Research Chair in 'eSociety' and Industrial Research Chair in Intelligent Systems Design. Founding Director of Adaptive Risk Management Lab and Emergent Information Systems Lab researching evolvable architectures for resilience governance and holistic security ecosystems. PhD Intelligent Systems, Germany. Awarded author, over 200 scientific articles. Awarded poet, multilingual. Native of Romania. Raised her two sons as single parent.

Mitko Karushkov, Mitko Karushkov has been providing legal, regulatory, compliance, transactional and business solutions to international companies for more than 20 years now. Focused on enterprise companies and their strategic (or daily) operations, Mitko has solved matters related to the digital, tech or electronic assets of such businesses. Active and involved also in bridging between traditional and technology markets, including to the application of the EU DSA, DMA, AI and other regulations. Media, Telecoms, IPRs, Corporate, M&As are also part of the service portfolio of Mitko. For further information: www.karushkov.com.

Patrick Orsos (mgoIT), Patrick Orsos has years of experience in technology, startups, and software development, Patrick has a proven track record of translating business needs into technical solutions that drive success. Patrick's problem-solving skills have enabled him to create innovative solutions that solve complex challenges and create value for clients. One of Patrick's most notable achievements was leading the development of Gopack, a revolutionary start-up that transformed the transport industry through digitalization. During his tenure, Patrick oversaw the development of the first digital ecosystem for small transportation businesses in Central & East Europe, which was awarded by Samsung and trusted by CEC Bank. Under Patrick's leadership, Gopack achieved an impressive 30% increase in efficiency and a 20% reduction in costs for clients.

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Prof. Ingrid Vasiliu-Feltes, MD MBA, Prof. Dr. Ingrid Vasiliu-Feltes is a visionary leader operating at the intersection of academia, business, government and not-for-profit sectors, recognized globally for her deep tech diplomacy and digital ethics efforts. With over two decades of executive experience, she has held numerous high-impact leadership roles and has extensive complex system integration expertise, driving the development of responsible, inclusive, diverse, sustainable AI, blockchain and other deep tech innovation ecosystems at a regional, national or international level. Her unique background positions her as a thought leader on how emerging or frontier technologies are posing unique ethical challenges and are reshaping law, regulatory frameworks, corporate governance, risk management, compliance and enterprise digital strategy. She is an alumna of MIT, Harvard, Stanford, Columbia University, and University of Miami's Herbert Business School. She is a Lean Six Sigma Master Black Belt, holding executive certifications in AI, Blockchain, Finance, Mediation, Tech Diplomacy, Human Rights, and Ethics. She has served as an expert advisor to numerous Fortune 100 and 500 companies, US DOD, IEEE, NIST, and EU, UN or G20-affiliated organizations, guiding them on strategic decisions around digital transformation, digital risk governance, digital trust, and digital cyber-ethics orchestration."

Thanking Our Individual Partners For Invaluable Support

Patrick Orsos,
Founder, mgoIT

Dr. Mihaela Ulieru,
IMPACT Institute for the Digital Economy, LLC

Martin Heitmann,
Guiding Teams to Success | Fostering Industry Best Practices | Enabling Innovation in Pharma & Healthcare

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