Annex 2 Example Provider Self-Assessment Checklist

Note: This checklist is provided for illustrative purposes only. It is not an official assessment or certification under the EU AI Act and does not replace any applicable legal obligations.

This declaration is completed by the provider of the product and provides a transparent overview of whether, and to what extent, the product contains or uses artificial intelligence (AI) within the meaning of the EU Artificial Intelligence Act (Regulation (EU) 2024/1689, as amended by Regulation (EU) 2026/1744 (Digital Omnibus on AI)).

The provider declares, based on the applicable requirements of the AI Act, which AI components or functionalities are present in the product, where they are used, and how they are classified in terms of AI Act risk. Where relevant, this assessment also takes into account the European Commission's Draft Guidelines on the Classification of High-Risk AI Systems, including the draft guidelines relating to Annex III and the practical examples provided therein.

The purpose of this declaration is to enable the product user and / or deploying organisation to identify whether AI is present in the product, where it is used, what function it performs, and which obligations or risks may apply under the AI Act.

The provider is responsible for the accuracy and completeness of the information provided in this declaration and should update it when relevant changes are made to the product, its AI components or their intended use.

Status of this declaration
This declaration is a self-assessment by the provider. It does not constitute an assessment, approval or certification by a competent authority. The information provided will be used by the deployer to assess the applicability of the AI Act and may be subject to verification by the relevant national competent or market surveillance authority. This document does not replace any statutory documentation or the EU declaration of conformity required under Article 47. The provider remains responsible for compliance with the obligations applicable to it under the AI Act. Any user of this self-assessment is encouraged to use only those parts relevant to its use case and/or purpose.

References to the classification of high-risk AI systems
References in this declaration to the classification of high-risk AI systems should be read in conjunction with the applicable provisions of the AI Act, including Article 6 and Annex III, as amended by Regulation (EU) 2026/1744.

The assessment may also refer to the **European Commission's Draft Guidelines on the Classification of High-Risk AI Systems**, published in May 2026, including the specific **Draft Guidelines on the Classification of High-Risk AI Systems: Annex III of the AI Act**. These draft guidelines are intended to support providers and deployers in assessing whether an AI system should be classified as high-risk and contain practical examples of AI systems that should or should not be classified as high-risk. They are non-binding and should therefore be considered supporting guidance rather than a source of legal obligations in themselves.

Where this declaration refers to **"Annex III guidance"**, this should be understood as referring to the **Draft Commission Guidelines on the Classification of High-Risk AI Systems – Annex III of the AI Act**, unless otherwise stated.

Where the assessment relies on a draft version of the Commission's guidance or on examples contained therein, the provider should check the applicable final version of the guidance before using the assessment as evidence of regulatory compliance.

1 Assessment against the definition of an 'AI system'

Article 3(1) of the AI Act defines an AI system as 'a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments'.

Answer the questions below for the system or component identified in this assessment. Select 'Unknown' where the available information is insufficient.

How to complete this checklist
Complete each question for the same system or component. Select 'Unknown' where the available information is insufficient and identify the missing information in the explanation column. Do not determine the result by counting 'Yes' or 'No' answers. Consider the system as a whole. The questions on techniques, adaptiveness and system integration provide supporting information and do not determine the result on their own.

Open in Adobe Acrobat Reader. Select a completed text field to read the full response.
Save a copy with your answers before signing on the final page.

Question	Yes	No	Unknown	Explanation / Document reference:
A system that runs on hardware and/or software and uses computational techniques to perform tasks.	○	○	○	
The system is designed to operate with some degree of independence from human involvement. Full autonomy is not required.	○	○	○	
The system has a clearly stated objective or an implicit objective that may be deduced from its behaviour or underlying assumptions.*	○	○	○	State the objective or objectives, where known:
The system infers, from the input it receives, how to generate outputs. Its inference capability transcends basic data processing through learning, reasoning or modelling; learning from data is not required in every AI system.**	○	○	○	Briefly describe the inference capability: Explanation or document reference:
The output of the system can be predictions (predictions), generated content (content), recommendations or decisions	○	○	○	Identify and briefly describe the output or outputs:
The output generated can influence a physical environment or virtual environment for example by influencing traffic-signal operation, road-network management, infrastructure control or the state of a traffic-management software environment. Art. 3(1) EU AI act	○	○	○	Briefly describe how the outputs can influence the environment:
The system may adapt itself after commissioning or learn from new data and experiences. This is optional, but may occur	○	○	○	Where applicable, briefly describe how the system's behaviour can change while in use:
Possible indication of simpler traditional software *(A 'Yes' answer may indicate that the system is simpler traditional software rather than an AI system. Consider this answer together with the other information in the checklist)* Is the system limited to automatically executing operations based on rules defined solely by natural persons, without learning, reasoning or modelling at any stage of the system lifecycle?	○	○	○	Briefly describe the rules and operations:
System boundary and integration	Where the system qualifies as an AI system, select all that apply: ☐ On a stand-alone basis ☐ As a component of a broader ITS system or product ☐ Physically integrated into the system or product (embedded) ☐ Serves the functionality of the system or product without being physically integrated into it (non-embedded) ☐ Unknown Identify the broader system or product and briefly describe the integration:			

*) An explicit objective is a clearly stated goal. An implicit objective is not explicitly stated but may be deduced from the behaviour or underlying assumptions of the system. The objectives of the system may be different from its intended purpose.

**) Consider whether the system's capability transcends basic data processing by enabling learning, reasoning or modelling. Inference may include deriving models or algorithms from inputs or data during the building phase or obtaining outputs from inputs during the use phase.

Result of the assessment against Article 3(1). Select one:

- ◯ The system under assessment *does not qualify* as an AI system within the meaning of Article 3(1) of the AI Act.
- ◯ The system under assessment *qualifies* as an AI system within the meaning of Article 3(1) of the AI Act.
- ◯ One or more identified systems or components within the broader ITS system *qualify as AI systems*.
- ◯ The available information is *insufficient to determine* whether the system or one or more of its components qualify as an AI system. *Further assessment* is required.

Brief explanation, including the relevant system or components and any information still required:

Follow-up where the system qualifies as an AI system

Where the system or an identified component qualifies as an AI system:

- ☐ Identify the provider of each AI system.
- ☐ Determine whether the AI system is classified as high-risk under Article 6 of the AI Act.
- ☐ Record the grounds for the high-risk or non-high-risk classification.
- ☐ Where the provider relies on Article 6(3), request the documented assessment referred to in Article 6(4).
- ☐ Where relevant to a separate human-facing function of the system, check whether Article 50 imposes additional transparency obligations. This is separate from the Annex III point 2 classification.
- ☐ Where the AI system is classified as high-risk, continue with the provider and deployer checklists in this publication.

2 Information on the assessment and the system

Legal timing note: the high-risk requirements in Chapter III, Sections 1 to 3 applicable to systems classified under Article 6(2) and Annex III apply from 2 December 2027. This means providers and deployers of applicable high-risk AI-systems placed on the market or put into service as of this date must comply with the applicable requirements and obligations. Be aware, that in any case, providers and deployers of high-risk AI systems intended to be used by public authorities must take the necessary steps to comply with the applicable requirements and obligations by 2 August 2030. This assessment may be used before that date for classification, procurement and compliance readiness. Transitional provisions for systems placed on the market or put into service before that date are set out in Article 111(2). In any case, providers and deployers of high-risk AI systems intended to be used by public authorities must take the necessary steps to comply with the applicable requirements and obligations by 2 August 2030.

Item	Information to be provided
General Company Information:	
Name of person or body completing the assessment	
Address and contact details	
Name and function of the natural person completing the assessment	
Scope (article 2.1) under the AI Act. Select all that apply:	☐ Providers placing on the market or putting into service AI systems or placing on the market general-purpose AI models in the Union, irrespective of whether those providers are established or located within the Union or in a third country ☐ Deployers of AI systems that have their place of establishment or are located within the Union ☐ Providers and deployers of AI systems that have their place of establishment or are located in a third country, where the output produced by the AI system is used in the Union ☐ Importers and distributors of AI systems ☐ Product manufacturers placing on the market or putting into service an AI system together with their product and under their own name or trademark ☐ Authorised representatives of providers, which are not established in the Union ☐ Other affected persons that are located in the Union:

Item	Information to be provided
Detailed product / system information:	
System brand / trade name, where applicable	
System name and model / type	
Additional unambiguous reference allowing identification and traceability of the system	
Version number of the system, including its relation to previous versions	
System, version, components and processes covered by this assessment	Identify the parts of the system covered by the assessment, including any AI system, AI model, tool, service, component or process used or integrated in the system.

System, version, components and processes covered by this assessment

Item	Information to be provided
Intended use of the AI system	
Intended purpose of the system under assessment, including the specific context and conditions of use, as specified by the provider. Describe separately any different intended deployment contexts or optional functions that could change the high-risk classification.	Reference to the relevant instructions for use, promotional or sales materials and statements, and technical documentation: Intended purpose, context and conditions of use
~~Customer / contracting authority~~ Intended deployer / contracting authority and Member State of intended deployment	
Confirm system is direct of indirectly used by a critical entity	☐ intended to be used by a road traffic entity (i.e. a road authority or an operator of Intelligent Transport Systems) that has been identified as a critical entity by a Member State under the CER Directive.
Confirm system used on critical infrastructure (road traffic) (article 6.2 – Annex III)	☐ Management and operation of road traffic

Item	Reference	Information to be provided
The AI system (results of #1 of this assessment)	Art. 3.1 AI Act	☐ is a machine-based system ☐ is designed to operate with varying levels of autonomy ☐ may exhibit adaptiveness after deployment ☐ infers (for explicit or implicit objectives), from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments
The AI system	Art 5 AI act	☐ Does not perform prohibited AI practices
Level of risk of the AI system	Art 6 (2), annex III AI Act	Classification under this assessment: ◯ High-risk under Article 6(2) and Annex III point 2 ◯ Not high-risk under Article 6(3), subject to documented assessment ◯ Outside Annex III point 2 ◯ Insufficient information This result does not exclude another applicable AI Act classification or obligation.
Where the AI system is classified as high-risk under Article 6(2) and Annex III point 2, has it been registered at national level?	Art. 49(5) AI Act	◯ yes ◯ no ◯ not applicable, because:
The AI system is intended to be used in an asset, a facility, equipment, a network, or a system or a part of an asset, a facility, equipment, a network or a system	§ 195 Draft specifications	☐ Traffic management control, including aspects related to road network planning, control and management services ☐ Intelligent wTransport Systems services (operators of Intelligent Transport Systems);
If the AI system fails or becomes unavailable, is there an independent redundant, backup or fail-safe mechanism that continues to protect persons and property? Describe that mechanism and whether it changes the safety-component assessment.	Draft specifications § 186	

Item AI act compliance -detail	References	Information to be provided		
Does the AI fulfil a safety function for a product or AI system, meaning that its intended purpose is to prevent or mitigate risks to the health and safety of persons or property?	Art 3 (14) as amended by Regulation (EU) 2026/1744.	○ yes	○ no	○ not applicable, because:
A safety function means a component of a product or of an AI system which fulfils a safety function for that product or AI system, or the failure or malfunctioning of which endangers the health and safety of persons or property;				
If no, was chosen on above question: Could its failure or malfunction nevertheless endanger health or safety of persons or property?	Article 3(14), 6(1b AI Act)	○ yes	○ no	○ not applicable, because:
AI system used as safety component	Article 6(2) Annex III (2), AI Act	○ yes	○ no	○ not applicable, because:
Can the AI system's outputs influence traffic signal control, prioritisation or other safety-critical traffic management functions?	Annex III §3.2.1, (180-184) §3.2.3, (196) and examples,	○ yes	○ no	○ not applicable, because:
Does the AI system monitor or detect situations that may lead to physical harm or physical damage?	Art. 3(14); Annex III Draft Guidelines §184(a)	○ yes	○ no	○ not applicable, because:
Can failure or malfunction of the AI system affect traffic safety or the physical integrity of road infrastructure?	Article 3(14); Article 6(1b) AI Act	○ yes	○ no	○ not applicable, because:
If the AI system only provides information, analysis or optimisation advice, does it trigger or control traffic management actions?	Article 6(1a)-(1b); Annex III AI Act, Draft Guidelines §181-183	○ yes	○ no	○ not applicable, because:

Item AI act compliance -detail	References	Information to be provided		
Does the provider claim that the AI system falls within art 6 (2) and Annex III point 2 but is nevertheless not high-risk under Article 6(3)?	Art. 6(3)-(4) and 49(2) AI Act	○ No ○ Yes. If yes, confirm both of the following: ☐ The AI system does not pose a significant risk of harm to the health, safety or fundamental rights of natural persons, including by not materially influencing the outcome of decision-making; and		
		At least one of the following conditions applies: ☐ Yes, Article 6(3)(a), narrow procedural task ☐ Yes, Article 6(3)(b), improves the result of a previously completed human activity ☐ Yes, Article 6(3)(c), detects decision-making patterns or deviations without replacing or influencing the previously completed human assessment without proper human review ☐ Yes, Article 6(3)(d), performs a preparatory task		
		Does the AI System perform profiling of natural persons? ○ No ○ Yes. If yes, Article 6(3) cannot be relied upon and the system remains high-risk		
		Reference to the provider's documented assessment required by Article 6(4): _		
		Where Article 6(3) is relied upon, has the provider registered the system in the EU database in accordance with Article 49(2)? ○ yes ○ no		
Has a risk management system been established, implemented, documented and maintained for the AI system?	Art. 9(1), AI Act	○ yes	○ no	○ not applicable, because:
Does the risk management process cover known and reasonably foreseeable risks during the entire lifecycle?	Art. 9(2), especially 9(2) (a)-(c), AI Act	○ yes	○ no	○ not applicable, because:
Has the AI system been tested against predefined metrics and thresholds appropriate to its intended purpose?	Art. 9(8), AI Act	○ yes	○ no	○ not applicable, because:
Where applicable, have the training, validation and testing data been assessed against the requirements of article 10?	Art. 10(1)-(4),; Reg. 2026/1744 Art. 1(9), (AI Act, as amended in 2026)	○ yes	○ no	○ not applicable, because:
Is the operation of the AI system sufficiently transparent to enable deployers to interpret and appropriately use its outputs?	Art. 13(1), AI Act	○ yes	○ no	○ not applicable, because:
Are clear, concise, complete and correct instructions for use provided to the deployer, containing information that is relevant, accessible and comprehensible?	Art. 13(2), AI Act	○ yes	○ no	○ not applicable, because:

Item AI act compliance -detail	References	Information to be provided		
Do the instructions describe the system's intended purpose, capabilities and limitations?	Art. 13(3)(b); Recital 72, AI Act	○ yes	○ no	○ not applicable, because:
Are human oversight measures provided to enable effective human oversight during operation?	Art. 14(1)-(4); Recital 73, AI Act	○ yes	○ no	○ not applicable, because:
Does the AI system achieve appropriate levels of accuracy, robustness and cybersecurity and perform consistently in those respects throughout its lifecycle?	Art. 15(1)-(5), AI Act	○ yes	○ no	○ not applicable, because:
Can the AI system modify, circumvent or override safety constraints estab-lished independently of the AI component?	Recital 73 Art. 14(4); Art. 15(4) AI Act	○ yes	○ no	○ not applicable, because:
Are the levels of accuracy and the relevant accuracy metrics declared in the accompanying instructions of use.	Art. 15.3 AI Act	○ yes	○ no	○ not applicable, because:
Has an EU declaration of conformity been drawn up, for each high-risk AI system in accordance with Article 47 and Annex V?	Article 16(g), and Article 47(1-2), AI Act	○ yes	○ no	○ not applicable, because:
Has the CE marking been affixed in accordance with	Article 16(h); Article 48 AI Act	○ yes	○ no	○ not applicable, because:
Has the required conformity assessment procedure been completed, as applicable before placing the system on the market or putting it into service?	Article 16(f), Article 43, possibly Article 46(1),	○ yes	○ no	○ not applicable, because:
Does the AI system prevent, control, limit or mitigate risks of physical harm to persons or physical damage to property?	Article 3(14); AI Act, Draft Guidelines Annex III Guidelines §184(a)-(f)	○ yes	○ no	○ not applicable, because:
Has the technical documen-tation required by Article 11 and Annex IV been drawn up and kept up to date?	Article 11 and Annex IV	○ yes	○ no	○ not applicable, because:
Does the high-risk AI system technically allow automatic recording of events in accordance with	Article 12	○ yes	○ no	○ not applicable, because:

Item AI act compliance -detail	References	Information to be provided		
Does the provider have a documented quality management system meeting	Article 17?	○ yes	○ no	○ not applicable, because:
Are the required technical documentation, quality-management documentation, logs and EU declaration retained in accordance with	Articles 18 and 19?	○ yes	○ no	○ not applicable, because:
Are arrangements in place to take the necessary corrective action where the provider considers or has reason to consider that the high-risk AI system is not in conformity with the AI Act, and to inform the relevant parties and authorities where required?	Article 20(1) (2)	○ yes	○ no	○ not applicable, because:
Are a post-market monitoring system and plan in place in accordance with	Article 72?	○ yes	○ no	○ not applicable, because:
Are procedures into place to report serious incidents concerning the high-risk AI system to the relevant market surveillance authority within the time limits set out in Article 73?	Article 73(1)-(5)	○ yes	○ no	○ not applicable, because:

Item AI act compliance -detail	References	Information to be provided		
Have you assessed whether your organisation must be considered the provider of the AI system under Article 25(1), even if it did not originally develop or place the AI system on the market? Consider whether your organisation: ■ puts its name or trade-mark on a high-risk AI system already placed on the market or put into service; ■ makes a substantial modification to a high-risk AI system already placed on the market or put into service, while it remains a high-risk AI system; or ■ modifies the intended purpose of an AI system that was not classified as high-risk in such a way that it becomes a high-risk AI system.	Article 25(1)	○ yes	○ no	○ not applicable, because:
For a high-risk AI system, where Article 25(4) applies, is there a written agreement with the relevant third-party supplier specifying the necessary information, capabilities, technical access and assistance required for compliance?	Article 25(4), as amended by Regulation (EU) 2026/1744.	○ yes	○ no	○ not applicable, because:

Item	Reference AI act	Information to be provided		
Additional assessments questions for AI in iTLC				
Can the AI system independently modify or override mandatory safety settings, such as conflict exclusions, clearance times or minimum green times?	§4.3.6-4.3.7, 7.7; ITF ControlData §12; Recital 73	◯ yes	◯ no	◯ not applicable, because:
Can external factors, including cyber incidents, cause the AI system to bypass or compromise predefined safety mechanisms?	Art. 15(4)-(5),	◯ yes	◯ no	◯ not applicable, because:
Are the boundaries within which the AI system may optimise predefined and technically enforced independently of the AI component where those boundaries protect safety?	Recital 73; Art. 9(8); Art. 13(3); Art. 14 §4.3.7/§7.7	◯ yes	◯ no	◯ not applicable, because:
Where AI is used for TTG/TTR (Time to Green/Red information for road users), are accuracy, timeliness and communication latency controlled and validated against prior defined metrics and probabilistic thresholds that are appropriate to the intended purpose?	Art. 9(6),(8), p.56; Art.13(3)(b)(ii),; Art.15, Draft Guidelines example iTCS	◯ yes	◯ no	◯ not applicable, because:
Where AI is used for traffic prioritisation, are the prioritisation criteria and operational boundaries transparent and predefined? And does the system not have the ability to operate beyond those operating constraints, nor change these constraints by the system itself.	Art.13 Recitals 72-75 Draft Guidelines; example iTCS CROW Priority Services §§2.2-2.4, 3.2-3.4	◯ yes	◯ no	◯ not applicable, because:

3 Third-party elements

Are one or more AI systems, AI models, tools, services, components or processes supplied by a third party used or integrated in the system?

- ○ Yes
- ○ No

Does the system interact with another AI system that is not part of the system itself?

- ○ Yes
- ○ No

Where 'Yes' is selected, identify the relevant third party and the system, model, tool, service, component or process:

- ☐ One or more AI systems supplied by a third party are used or integrated in the system
- ☐ One or more AI models supplied by a third party are used or integrated in the system
- ☐ One or more tools, services, components or processes supplied by a third party are used or integrated in the system
- ☐ The system interacts with another AI system that is not part of the system itself

Identify the relevant third party and the system, model, tool, service, component or process, where known:

4. Scope of the assessment

This assessment applies only to the system, version, components, configuration, intended purpose, and specific context and conditions of use identified above.

It does not apply to a later version, version update, additional AI system, AI model, tool, service, component or process, integration, optional function, customer-specific configuration, or change to the intended purpose, unless that element is expressly included in the assessment.

Review the assessment where a change may affect the Article 3(1) AI-system qualification, intended purpose, system boundary, safety function, failure modes, Annex III classification, deployment context or critical-entity status. For a high-risk AI system, also assess whether the change constitutes a substantial modification under Article 3(23) and Article 43(4).

Information and documentation used for the assessment, where available:

- ☐ Instructions for use
- ☐ Technical documentation
- ☐ Promotional or sales materials and statements
- ☐ Information supplied by a third party
- ☐ Other:

Document references:

Next step

- Not an AI system: Retain this assessment and review it if the system, version, components, configuration or intended purpose change.
- AI system: Continue with the decision tree in this publication to determine the applicable AI Act requirements and whether the AI system may be classified as high-risk.
- Insufficient information: Request the missing information from the provider or another relevant party before completing the assessment.

Date of assessment:

Name:

Signature:

Click to sign with a digital ID