

ENACTMENT OF THE FIRST OBLIGATIONS UNDER THE ARTIFICIAL INTELLIGENCE ACT



FEBRUARY 2025

2 February 2025 marks the date from which the first obligations under the Artificial Intelligence Act (AI Act), the European Regulation aimed at regulating the use and development of artificial intelligence within the European Union, will officially come into force. This represents a crucial step towards uniform and transparent regulation of AI-based technologies, with the aim of guaranteeing security, protecting fundamental rights and promoting responsible innovation to make businesses more competitive.



Below is the first set of rules that entered into force on 2 February 2025:

- Chapter I - General Provisions. Among these, the regulation requires that the workforce of companies that provide or simply use artificial intelligence systems possess 'a sufficient level of **AI literacy**'. Therefore, it is required that corporations invest in in-house training by employing professionals with the necessary skills. Such training partly replicates the training obligation under the GDPR.
- Chapter II - Prohibited Practices. As of this date, there is a ban on the use of '**unacceptable risk**' AI systems, such as those using manipulative or deceptive techniques, social scoring systems and certain forms of remote biometric identification.

Companies that fail to comply with these provisions may face significant penalties, with fines of up to EUR 35 million or up to 7 per cent of the company's annual global turnover.



The next important deadline for this year is **August 2025**, when the governance rules and obligations for general purpose AI models will become applicable. These obligations include, but are not limited to:

1. documenting the testing performed and the development of such systems,
2. follow standardised security procedures
3. conducting periodic conformity assessments.

The entry into force of these obligations is only the first step towards the full implementation of the AI Act, which is planned for 2026. We therefore urge interested companies and operators to undertake the necessary activities to comply with the new regulatory provisions in a prompt manner.

For further information contact:

Mauro Festa

Partner Cernelutti IP Team

mfesta@cernelutti.com

 [Mauro Festa](#)