ROADMAP

A 60-Day Roadmap to EU AI Act Compliance

A QA-led implementation plan. Powered by aqua cloud

EU AI Act regulatory deadline:	EU AI Act regulatory deadline: 2 August 2026
Penalties:	Penalties: up to €35M or 7% of revenue based on violation type
Test and requirements management platform:	Test and requirements management platform: aqua cloud, AI-driven, EU-hosted, ISO 27001 certified

Executive Summary

Regulatory Background

The EU AI Act entered into force on 1 August 2024. The compliance bar for high-risk AI systems lands on 2 August 2026, with penalties reaching €35 million or 7% of global annual turnover for prohibited practices and €15 million or 3% for high-risk system non-compliance. Notified body capacity is already constrained; organisations without a structured evidence trail are queuing behind those that have one.

This roadmap takes a QA department from its current state to audit-ready in 60 calendar days. It assumes aqua cloud has been selected as the test management platform and focuses on rolling it out, populating it with the right evidence, and rehearsing the audit before the regulator does.

Why 60 Days Is Realistic with aqua cloud

Compliance preparation is often a challenge if a team has to spend weeks consolidating evidence from Jira, Confluence, Excel, shared drives, email, specialised tools, and other sources of data. aqua helps to eliminate that consolidation entirely, as it can be set up in a way that every Article 9–15 obligation has a named artefact in a single, immutable chain with easy traceability. On top of that, even teams that are new to aqua cloud can get their digital ecosystem up and running fast enough to prepare for audits well in advance. Here is how aqua cloud onboarding and EU AI Act preparation can be carried out within the same two months:

- aqua onboarding and AI Act preparation start on the same day; no sequential wait between tooling readiness and compliance work
- The AI Copilot generates structured test cases against every imported requirement in hours, not weeks
- Report templates are locked to the Annex IV structure before evidence generation begins; no formatting sprint before the notified body submission
- The requirement-to-execution-to-sign-off chain is enforced by aqua's workflow, not maintained in a manual spreadsheet
- Scheduled reports, trend alerts, and change-driven re-validation keep the evidence chain current after the regulatory deadline

AI Act Compliance Phases and Onboarding Alignment

Hands-on onboarding is a structured five-week engagement in which aqua's CS Manager configures the tenant, connects integrations, and trains users on your actual project. It aligns with the first five weeks of the compliance programme so that by Phase 3 the team is operating independently.

Self-guided onboarding is available from tenant provisioning. The first two weeks focus on platform familiarisation using aqua's knowledge base, video library, and product documentation. From Week 3 onward, the team builds live processes at their own pace with customer support available throughout.

Phase	Days	AI Act Focus	Hands-On Onboarding	Self-Guided Onboarding
Phase 1 **AI System Classification and Evidence Gap Assessment**	**Days 1–10** approx. 2 weeks	• AI system inventory • Article 6 / Annex III classification • Gap assessment: Articles 9–15 and 17 • Programme charter and steering committee	• Week 0: Kick-off call, admins (1 hr) • Week 1: Admin session 1 (2 hr)	Weeks 1–2: Familiarise with knowledge base and video library
Phase 2 **Compliance Evidence Infrastructure on aqua**	**Days 11–25** approx. 2 weeks	• Tenant configured • Requirements imported and classified • AI Copilot generates test cases • Traceability matrix live • Developer toolchain connected	• Week 2: Admin session 2 (2 hr) • Weeks 3–4: End user sessions 1 and 2 (1.5 hr each	Weeks 1–2: Familiarise with knowledge base and video library
Phase 3 **Article 9–15 Evidence Generation**	**Days 26–45** approx. 3 weeks	• Test campaigns for Articles 9–15 • Risk, data governance, documentation, record-keeping, transparency, human oversight, accuracy and robustness evidence produced	• Week 5: Q&A session, all users (1 hr) • Onboarding complete	Ongoing: team fully operational
Phase 4 **Pre-Submission Audit, Remediation, and Regulatory Handover**	**Days 46–60** approx. 2 weeks	• Technical File export • Internal mock audit • Remediation sprint • Notified body handover • Article 17 QMS sign-off • Continuous monitoring activated	Fully onboarded	Fully onboarded

Phase Breakdown

PHASE 1

AI SYSTEM CLASSIFICATION AND EVIDENCE GAP ASSESSMENT

Days 1–10 | Approximately 2 weeks

Objective: Identify and classify every in-scope AI system under Article 6 and Annex III, map evidence gaps against Articles 9–15 and 17, and stand up the programme governance structure. Phase 2 does not begin until the classification is signed off by Legal and the steering committee has formally met.

Week / Days	Focus	Key Activities
Week 1 Days 1–5	Inventory and classification	• Stand up the steering committee: QA Lead, CTO/Eng VP, Legal Counsel, Compliance, DPO, Product; agree weekly cadence • Build the AI system inventory: every model, decision layer, recommendation engine, scoring algorithm, and AI feature embedded in a larger product • Classify each system under Article 6 / Annex III as prohibited, high-risk, limited-risk, or minimal-risk; determine which enter the programme and which are deferred • Contact notified bodies on Day 1; capacity is the gating constraint and cannot be left to Phase 4
Week 1 Days 1–5	Inventory and classification	• Run gap assessment against Articles 9–15 and 17; record current evidence source, format, and owner for each obligation, including what already exists in Excel, Confluence, or email • Draft the programme charter covering scope, RACI, decision rights, and budget • Legal Counsel reviews the gap assessment and flags obligations owned outside QA • Steering committee sign-off on Day 10; Phase 1 closes

Deliverables

- AI System Inventory with Article 6 / Annex III classification, risk tier, and steering committee sign-off
- Gap Assessment Report covering Articles 9–15 and 17: current evidence, target evidence, named owner, and effort per obligation
- Programme Charter with scope, RACI, and defined decision rights

Exit Criteria

- ✓ Every in-scope AI system has a classification confirmed in writing by Legal Counsel, covering all systems in production and active development
- ✓ Gap assessment has a named owner and target evidence format assigned for every Article obligation; no gap is unowned
- ✓ At least two notified bodies have provided written acknowledgement with at least one confirmed assessment window
- ✓ aqua tenant provisioned on an EU-region URL and confirmed accessible by InfoSec

Suggested Actions: AI Act Preparation and aqua Onboarding

Phase 1 compliance work runs outside aqua. The tenant is being provisioned; importing into an unconfigured environment creates rework.

- Collect all AI Act-relevant materials now: Excel inventories, Word assessments, Jira epics, Confluence pages – these will be imported via aqua's wizards in Phase 2
- Agree a naming convention for aqua projects so project names match the inventory IDs established this phase
- Hands-on: use the kick-off call to scope integrations (Jira, Azure DevOps, SSO) and migration sources with the CS Manager so admin sessions proceed without gaps
- Self-guided: focus Weeks 1 and 2 on admin-level workflow configuration documentation in the knowledge base

PHASE 2

COMPLIANCE EVIDENCE INFRASTRUCTURE ON AQUA

Days 11–25 | Approximately 2 weeks

Objective: Configure aqua as the single source of truth for AI Act evidence. Import all in-scope requirements, generate and approve test cases using the AI Copilot, and establish a working traceability matrix with the developer toolchain connected. By Day 25 the team can produce a full traceability matrix on demand.

Week / Days	Focus	Key Activities
Week 3Days 11–15	Tenant setup and integrations	• Configure SSO and RBAC with roles: QA Engineer, QA Lead, Compliance Reviewer, Approver, Auditor (read-only) • Create the project hierarchy: AI system > release > requirement > test case > execution > defect > sign-off • Add Articles 9–15 and 17 as custom risk classification fields on requirements and test cases • Install and validate Jira, Jenkins, and Azure DevOps integrations using a pilot project to confirm bidirectional defect sync

Week / Days	Focus	Key Activities
Week 4 Days 16–20	Requirements import and AI Copilot	• Import requirements from Jira, Confluence, Excel, and other existing tools using aqua's import wizards; reconciliation reviews on Days 17–19 to resolve mapping gaps • Apply Article-level classification to each requirement: tag intended purpose, risk tier, and affected population • Run the AI Copilot across all in-scope requirements to generate test cases (positive, negative, edge, adversarial); every generated test case requires explicit QA Engineer approval before it is treated as active • Map each test case back to its source requirement to establish the traceability chain from day one
Week 5 Days 21–25	Workflows, sign-off, and training	• Configure the defect workflow with audit fields: root cause, risk impact, Article reference, resolution, and verification • Configure the sign-off workflow for Article 14: test execution sign-off, release sign-off, and change sign-off, each captured with timestamp and user identity • Lock report templates to Annex IV Technical File structure; all future exports are audit-ready without manual editing • Day 25: readiness review with the steering committee

Deliverables

- Configured aqua tenant with SSO, RBAC, Article classification fields, Article 14 sign-off workflow, and Annex IV report templates locked
- Requirements backlog fully imported with Article classification and risk tier applied to every record
- Test case library: AI Copilot-generated and human-approved, with every test case linked to its source requirement

Exit Criteria

✓ 100% of in-scope requirements in aqua with Article classification and risk tier confirmed on every record

✓ Every requirement has at least one linked, human-approved test case recorded in the aqua audit log

✓ Traceability matrix exports cleanly to PDF, DOCX, and XLSX without manual editing, verified by the QA Manager

✓ Jira and Azure DevOps bidirectional sync confirmed via at least one test defect passing end-to-end

Suggested Actions: AI Act Preparation and aqua Onboarding

Hands-on admin sessions (onboarding Weeks 1–2) complete the environment build during this phase; end user sessions (Weeks 3–4) train the QA team on the live environment using actual project data. By Day 25 the Q&A session closes any open questions

- Use aqua's import wizards to migrate from Jira, Confluence, and Excel; do not recreate requirements manually as the import path preserves context and accelerates classification tagging
- Enable the AI Copilot across the full imported backlog by end of Week 4; do not skip human review gates
- Enforce the sign-off workflow from the first test execution in Week 5; informal approvals by Slack or email must stop at this point

PHASE 3

ARTICLE 9–15 EVIDENCE GENERATION

Days 26–45 | Approximately 3 weeks

Objective: Execute the test campaigns that produce the evidence each AI Act Article requires. Every execution creates a time-stamped, user-stamped record in aqua. Every defect is linked to a requirement and a verified resolution. Every sign-off is recorded against a named person with the correct role.

Week / Days	Focus	Key Activities
Week 6 Days 26–30	Article 9 and Article 10	• Art. 9: Set up defect trend monitoring tracking severity, frequency, and resolution time per release; create a mitigation record for every classified risk linked to the test case that validates it • Art. 10: Produce data quality and representativeness reports for training, validation, and test datasets including sampling methodology and bias check findings • Art. 10: Record dataset provenance, version history, and access controls; link each dataset record to the test executions that consumed it • Sign off the Week 6 evidence pack with the DPO and Compliance Lead
Week 7 Days 31–35	Article 11 and Article 12	• Art. 11: Verify the aqua report template matches Annex IV exactly; populate every section from live aqua artefacts, not from copy-pasted external documents • Art. 12: Confirm the audit trail captures every relevant lifecycle event automatically and that log retention meets the AI Act minimum • Art. 12: Run test cases validating that the AI system's own logging capabilities are implemented and functioning as required • Mid-phase legal review with Legal Counsel
Week 8 Days 36–40	Article 13 and Article 14	• Art. 13: Produce the instructions for use; run test cases confirming actual system behaviour matches documented behaviour in all intended use conditions • Art. 13: Log all transparency-related tests (explanations, confidence indicators, output disclosures) against Article 13 requirements in aqua • Art. 14: Confirm the sign-off workflow blocks release closure without a named human approver; document human override and intervention scenarios as mandatory test executions
Week 9 Days 41–45	Article 15	• Art. 15: Run accuracy testing against defined metrics and probabilistic thresholds; record required threshold and achieved result for each metric per execution • Art. 15: Run robustness testing covering adversarial inputs, edge cases, distribution drift, and fallback behaviour; link any cybersecurity or pen-test summary to the evidence chain • Run final regression over all in-scope AI systems; lock the evidence trail for each release once complete • Day 45: evidence completeness review with Legal and Compliance

Deliverables

- Article 9 risk dashboard with live defect trend tracking; Article 10 data governance pack including dataset inventory, quality reports, and bias check results
- Annex IV Technical File sections populated from aqua artefacts; Article 12 event logs covering the full test and validation lifecycle
- Article 13 instructions-for-use with linked behavioural validation evidence; Article 14 sign-off log with named human approvers on every release
- Article 15 accuracy and robustness test results with required thresholds and achieved metrics recorded per execution

Exit Criteria

✓ Every Article 9–15 obligation has at least one linked, time-stamped artefact in aqua; evidence completeness sign-off obtained from QA Manager, Legal Counsel, and Compliance Lead on Day 45

✓ Sign-off log confirms 100% of releases carry a named human approver with role recorded; zero automated or blank approvals in the programme window

✓ Annex IV Technical File exports with no blank, TBD, or manually completed fields

✓ Defect-to-resolution chain is unbroken for every defect in the programme window; no open defect without a resolution record or signed risk acceptance

Suggested Actions: AI Act Preparation and aqua Onboarding

By Phase 3 the hands-on Q&A session closes onboarding. The team is fully independent. Focus is execution discipline: all test results, defects, and sign-offs flow through aqua only.

- Use aqua's defect trend tracking as the live Article 9 risk record; discontinue any parallel risk spreadsheet
- Run all test executions through aqua so log entries are automatic; records created outside aqua have no evidentiary value for the audit
- Use Capture for manual and exploratory findings so each carries a screenshot, timestamp, and environment record
- Lock each release after evidence is confirmed complete; aqua's release lock prevents retroactive modification of the chain

PHASE 4

PRE-SUBMISSION AUDIT, REMEDIATION, AND REGULATORY HANDOVER

Days 46–60 | Approximately 2 weeks

Objective: Pressure-test the full evidence set with an internal mock audit. Remediate all findings. Sign off the Article 17 quality management system and activate continuous monitoring so compliance remains current after the regulatory deadline.

Week / Days	Focus	Key Activities
Week 10 Days 46–50	Mock audit dry run	• Day 46: Generate the full Technical File from aqua in one click; note the time taken as the benchmark for future audit responses • Day 47: Internal mock audit with Legal Counsel and, where available, an external advisor reviewing the evidence as a regulator would • Days 48–49: Log every finding in aqua with severity and Article reference; no finding is tracked outside aqua • Day 50: Prioritise the remediation backlog; limit scope to items resolvable within five working days
Week 11 Days 51–55	Remediation sprint	• Run a focused sprint against the mock audit finding backlog; re-execute any test that produced ambiguous or insufficient evidence in Phase 3 • Re-export the Technical File after each batch of fixes and verify the evidence chain reflects the corrections • Confirm the notified body slot and agree on the final document handover format • Brief the executive sponsor (CTO/CPO) on residual risk and the proposed go-live decision
Week 12 Days 56–60	QMS sign-off and go-live	• Article 17 QMS review and formal sign-off by the CTO or CPO; stored as a formal artefact in aqua • Final Technical File handed to the notified body in the agreed format • Activate continuous monitoring: scheduled aqua reports, defect trend alerts, dataset drift checks, and re-validation triggers on requirement changes • Day 60: go/no-go review; programme transitions from project to operating mode

Deliverables

- Internal mock audit report with all findings logged, remediated, or risk-accepted in aqua
- Final Technical File handed to the notified body; Article 17 QMS formally signed by the CTO or CPO
- Article 72 post-market monitoring plan with named owner, monitoring cadence, and re-validation trigger conditions

Exit Criteria

✓ All mock audit findings closed with a verified fix or written risk acceptance from Legal; zero findings remain unresolved in aqua

✓ Notified body has confirmed receipt of the Technical File and provided a written assessment window date

✓ Continuous monitoring active: at least one scheduled report and one change-driven re-validation trigger configured per in-scope AI system

✓ Go/no-go decision signed by the executive sponsor and recorded in aqua; programme formally transitions to operating mode

Suggested Actions: AI Act Preparation and aqua Onboarding

aqua is fully operational at this point. Use it as an auditor would: trace every obligation to its artefact with no dead ends.

- If the Technical File export requires manual editing, that gap must be resolved before submission to the notified body
- Schedule recurring reports in aqua: weekly defect trend and monthly compliance summary become the post-deadline monitoring cadence
- Configure change-driven re-validation so any update to an in-scope requirement flags the test cases that need re-execution
- Lock the final audited release in aqua to make the evidence chain immutable from the submission date forward

A 60-Day Roadmap to EU AI Act Compliance

The table below maps each AI Act obligation to the specific aqua capability that satisfies it. Every artefact listed is exportable from aqua and ready for direct inspection by a notified body auditor.

AI Act Article	What the Regulation Requires	How aqua Covers It
Art. 9 Risk managemen	• Providers shall establish, implement, document, and maintain a risk management system across the entire AI system lifecycle • System shall comprise identification of known and reasonably foreseeable risks, estimation and evaluation from intended use, and adoption of risk management measures; residual risk shall be evaluated post-mitigation	• Risk-classified requirements and test cases with Article 9 fields enforced by workflow; defect trend dashboard serves as the live risk record per release • Every mitigation measure linked to the test case that validates it; change history provides full lifecycle traceability
Art. 10 Data and data governance	• Training, validation, and test datasets shall be relevant, sufficiently representative, and to the best extent possible free of errors and complete, with appropriate statistical properties for the intended user population • Providers shall document data governance practices and examine datasets for possible	• Dataset records linked to the test executions that consumed them; provenance, version history, and access controls are immutable in the audit trail • Quality reports, bias check results, and sampling methodology attached as evidence artefacts per dataset version
Art. 11 Technical documentation	• Before market placement, providers shall draw up technical documentation in accordance with Annex IV, demonstrating compliance with Articles 9–15 and 17; documentation shall be kept current throughout the lifecycle	• Report templates locked to Annex IV from Phase 2; one-click export to PDF/DOCX with no manual assembly required • Every Annex IV field traceable to a source requirement, test execution, or sign-off record in aqua
Art. 12 Logging capabilitie	• High-risk AI systems shall technically allow automatic recording of events relevant to system integrity and post-market monitoring • For Annex III point 1(a) systems, logs shall additionally capture period of use, reference database, input data, and identity of verifying persons	• aqua houses the test cases validating that the AI system's logging capabilities meet the statutory specification • aqua's audit trail (requirements, executions, defects, sign-offs with timestamp and user) forms the test and validation process record
Art. 13 Transparency	• High-risk AI systems shall operate with sufficient transparency for deployers to interpret outputs correctly; actual behaviour shall correspond to documented behaviour under all intended use conditions • Providers shall supply instructions for use covering capabilities, limitations, accuracy levels, known risk-creating circumstances, and required oversight measures	• Instructions-for-use documents version-controlled in aqua and linked to test executions that validated behaviour against documentation • Transparency tests logged against Article 13 requirements; sign-off enforces QA confirmation that documented and actual behaviour correspond before release
Art. 14 Human oversight	• High-risk AI systems shall allow natural persons to effectively oversee operation, including the ability to understand the system, detect anomalies, override outputs, and interrupt operation • Oversight measures shall be built into the system or documented as external measures	• Sign-off workflow enforces a named human approver with the correct role on every execution, release, and change; automated or blank approvals are blocked at workflow level • Human override and intervention scenarios are mandatory test executions; closure without a recorded outcome is not permitted

AI Act Article	What the Regulation Requires	How aqua Covers It
Art. 15 Accuracy, robustness, and cybersecurity	• Systems shall achieve accuracy validated against defined metrics and probabilistic thresholds; systems shall be resilient against errors, faults, adversarial conditions, and attempts by unauthorised parties to exploit vulnerabilities • Technical redundancy solutions shall be considered	• Accuracy test suites capture required threshold and achieved result per metric; missed thresholds surface immediately as defects in the evidence chain • Robustness cases cover adversarial inputs, edge cases, and drift; cybersecurity test summaries linked as release-specific artefacts
Art. 17 Quality management system	• Providers shall implement a documented QMS covering regulatory compliance strategy, design and development control, testing and validation, risk management, post-market monitoring, complaint handling, and data management	• aqua's configured workflows (requirement lifecycle, test execution, defect management, sign-off, reporting) collectively form the operational QMS record • Combined with the organisation's QMS policy documents, the aqua workflow evidence is formally signed off as the Article 17 QMS artefact in Phase 4
Arts. 43–49 Conformity assessment	• Before market placement, providers shall follow the applicable conformity assessment procedure; for Annex III point 1 systems, a notified body shall be involved • Providers shall draw up an EU declaration of conformity and affix the CE marking	• Audit-ready bundle (Technical File, traceability matrix, defect log, sign-off record) exported in one click; no manual consolidation before notified body handover • Exported bundle locked in aqua as an immutable record from the submission date
Art. 72 Post-market monitoring	• Providers shall establish a post-market monitoring system to actively collect and review real-world performance data, identify emerging risks, and trigger corrective action • Monitoring shall be based on a post-market monitoring plan (Annex IX) assigned to a named responsible person	• Scheduled aqua reports deliver weekly defect trend summaries and monthly compliance packs automatically; trend alerts fire when risk thresholds are breached • Change-driven re-validation identifies every test case affected by a requirement change, keeping the evidence chain current through updates

Get Audit-Ready with aqua cloud

The 60-day window is a calendar window. Every week without a structured evidence platform is a week that cannot be recovered before the regulatory deadline.
aqua cloud is an AI-powered test and requirements management platform that connects your AI Act obligations to traceable, auditable evidence from day one. Its domain-trained AI Copilot generates structured test cases directly from imported requirements, grounding every output in your actual project documentation. With 12+ integrations including Jira, Azure DevOps, GitHub, and GitLab, aqua connects compliance work to your existing development workflows without replacing them.
Here is what aqua cloud offers for your AI Act compliance needs:

- EU-hosted, ISO 27001 certified, GDPR by architecture, and DORA-aligned
- Single evidence chain from requirement to sign-off, enforced by workflow and tamper-proof
- AI Copilot generates structured test cases against every imported requirement in hours
- One-click Annex IV Technical File export ready for notified body submission
- 12+ integrations including Jira, Azure DevOps, GitHub, and GitLab
- Immutable audit trail: every execution, defect, and sign-off captured with timestamp and named user
- Scheduled reports, defect trend alerts, and change-driven re-validation for post-deadline compliance

Book a technical demo session with aqua cloud

Appendix A – aqua Artefact Checklist

Use this as the audit pack manifest. Every item listed below is exportable from aqua.

- AI System Inventory with Article 6 / Annex III classification
- Requirements register tagged by Article and risk tier
- Test case library (with AI Copilot provenance flag where applicable)
- Traceability matrix per AI system (requirement > test case > execution > defect > resolution > sign-off)
- Defect register with root cause, Article reference, and resolution
- Sign-off log with named approvers and timestamps
- Dataset inventory linked to executions (Article 10)
- Annex IV Technical File export (Article 11)
- Event logs covering the lifecycle (Article 12)
- Accuracy and robustness test results (Article 15)
- Article 17 QMS document set
- Post-market monitoring plan (Article 72)

Appendix B – References

aqua cloud EU AI Act webinar:	https://aqua-cloud.io/eu-ai-act-webinar/
aqua cloud platform overview:	https://aqua-cloud.io/
EU AI Act – Article 9 (Risk Management System):	https://artificialintelligenceact.eu/article/9/
EU AI Act – implementation timeline:	https://artificialintelligenceact.eu/implementation-timeline/
Notified body capacity context:	https://eyreact.com/notified-bodies-ai-act/

aqua cloud's QA platform is purpose-built to help organizations prepare and structure their quality assurance processes for compliance, including alignment with the EU AI Act's. Whether you are looking to explore the platform firsthand or develop a tailored onboarding path for your team, our specialists are ready to guide you.

AI Act compliance walkthrough booking (aqua):

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