General-Purpose AI Code of Practice

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Introduction to the AI Act

The AI Act aims to provide AI developers ('providers') and deployers with clear requirements and obligations regarding specific uses of AI.

The AI Act has entered into force on August 1, 2024 and **will be fully applicable 2 years later**, with some exceptions: prohibitions have taken effect after six months, the governance rules and the obligations for general-purpose AI models become applicable after 12 months and the rules for AI systems - embedded into regulated products - will apply after 36 months.

This means that requirements regarding general-purpose AI models will be due per **2 August 2025**.

More information about the AI Act? Read AKD's whitepaper here.

More information about the GPAI Code of Practice? Go to EU Commission.

General-Purpose AI Code of Practice

The General-Purpose AI (GPAI) Code of Practice is a voluntary tool, designed to help industry comply with the AI Act legal obligations on safety, transparency and copyright of general-purpose AI models.

The Code was developed by independent experts through a multi-stakeholder process and was published on July 10, 2025. Member States and the Commission will first assess its adequacy. Once endorsed, AI model providers who voluntarily sign the Code can demonstrate AI Act compliance whilst reducing administrative burden and gaining more legal certainty compared to alternative compliance methods.

he Code of Practice consists of three separately authored chapters: Transparency, Copyright, and Safety and Security.

The chapters on Transparency and Copyright are relevant to all providers of GPAI models to demonstrate compliance with their obligations under Article 53 AI Act. The chapter on Safety and Security is only relevant to providers that are subject to the AI Act's obligations for providers of GPAI models with systemic risk under Article 55 AI Act.

General-Purpose AI

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General-purpose AI

The AI Act contains specific rules regarding"general-purpose AI". A model (within the context of an algorithm) is classified as general-purpose AI if the following conditions are met:

- The model is an AI model:
  - that displays significant generality; and
  - that is capable of competently performing a wide range of distinct tasks regardless of the way the model is placed on the market; and
  - that can be integrated into a variety of downstream systems or applications.

- Exception: AI models that are used for research, development or prototyping activities before being placed on the market are not classified as general-purpose AI models.

> Article 3(63) AI Act
> Recitals 97 and 99 AI Act

Examples

The key functional characteristics of the AI model are relevant for determining whether a model is considered a general-purpose AI model. General-purpose AI models are typically trained on large amounts of data, through various methods, such as self-supervised, unsupervised or reinforcement learning.
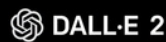
Large generative AI models are a typical example for a general-purpose AI model, given that they allow for flexible generation of content, such as in the form of text, audio, images or video, that can readily accommodate a wide range of distinctive tasks.

Other examples:

| ChatGPT | Dall-E | Google Gemini | Midjourney |

> Article 3(63) AI Act
> Recitals 97 and 99 AI Act

Points of attention

It is important to note that: AI models do not constitute AI systems on their own – AI models require the addition of further components;

AI models are typically integrated into AI systems;

Specific rules apply to general-purpose AI models;

If a provider of a general-purpose AI model integrates an own model into its own AI system, the specific rules regarding general-purpose AI models apply in addition to those applicable to AI systems;

The specific rules do not apply when an own model is used *for purely internal processes* that are not essential for providing a product or a service to third parties and the rights of natural persons are not affected;

Addition rules apply to general-purpose AI models with systemic risk.

> Article 3(63) AI Act
> Recitals 97 and 99 AI Act

Transparancy

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Transparancy obligations

Article 53 AI Act contains transparency obligations for all providers of general-purpose AI models.

The Transparency chapter of the Code of Practice offers a user-friendly Model Documentation Form which allows providers to easily document the information necessary to comply with the documentation obligations from Article 53(1), points (a) and (b) of the AI Act to ensure sufficient transparency.

The chapter describes three measures which signatories commit to implementing to comply with their transparency obligations:
- Measure 1.1 – Drawing up and keeping up-to-date model documentation
- Measure 1.2 – Providing relevant information
- Measure 1.3 – Ensuring quality, integrity, and security of information

In accordance with Article 53(2) AI Act, the measures do not apply to providers of GPAI models released under a free and open-source license that satisfy the conditions specified in that provision, unless the model is GPAI model with systemic risks.

Measures: model documentation

Measure 1.1 – Drawing up and keeping up-to-date model documentation

When signatories place a GPAI model on the market, they will have documented at least all the information referred to in de Model Documentation Form.

Signatories will update the Model Documentation Form to reflect relevant changes in the information contained in the Form, including in relation to updated versions of the same model, while keeping previous versions of the Model Documentation Form for a period ending 10 years after the model has been placed on the market.

The Model Documentation Form contains information on the following topics: General information, Model properties, Methods of distribution and licenses, Use, Training process, Information on the data used for training, testing and validation, Computational resources (during training) and Energy consumption (during training and inference).

The Form indicates whether the information documented is intended for the AI Office (AIO), national competent authorities (NCAs) or providers of AI-systems who intend to integrate the GPAI model into their AI systems ('downstream providers', DPs).

Measures: provision of information

Measure 1.2 – Providing relevant information

Information intended for DPs should be made available to them proactively, while information intended for the AIO or NCAs is only to be made available following a request from the AIO.

When signatories place a GPAI model on the market, they will publicly disclose via their website, contact information for the AIO and DPs to request access to the relevant information contained in the Model Documentation Form, or other necessary information.

Signatories will provide to DPs the information contained in the most up-to-date Form that is intended for DPs, subject to confidentiality safeguards.

Signatories will provide, upon a request from the AIO for one or more elements of the Form, or any additional information, that are necessary for the AIO to fulfil its tasks under the AI Act or for NCAs to exercise their supervisory tasks under the AI Act, in particular to assess compliance of high-risk AI systems built on GPAI models where the provider of the system is different from the provider of the model, the requested information in its most up-to-date form.

Measures: quality, integrity & security

Measure 1.3 – Ensuring quality, integrity, and security of information

Signatories will ensure that the documented information is controlled for quality and integrity, retained as evidence of compliance with obligations in the AI Act, and protected from unintended alterations.

Copyright

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Copyright obligations

The Copyright chapter of the Code of Practices offers providers practical solutions to meet AI Act's obligation to put in place a policy to comply with EU copyright law.

Providers that place general-purpose AI models on the market must put in place a policy to comply with Union law on copyright and related rights, and in particular to identify and comply with, including through state-of-the-art technologies, a reservation of rights expressed by rightsholders pursuant to Article 4(3) of Directive (EU) 2019/790.

To this end five measures are suggested.

> Article 53(1)(c) AI Act

Measures: policies and lawful content

Measure 1.1 Draw up, keep up-to-date and implement a copyright policy

Measure 1.2 Reproduce and extract only lawfully accessible copyright-protected content when crawling the World Wide Web
- In this regard committing:
- not to circumvent effective technological measures (as defined in Article 6(3) of Directive 2001/29/EC) that are designed to prevent or restrict unauthorised acts in respect of works and other protected subject matter (for instance respecting any restriction of access imposed by subscription models or paywalls)
- to exclude from their web-crawling websites that make available to the public content that are recognised as persistently and repeatedly infringing copyright and related rights on a commercial scale by courts or public authorities in the EU and EEA.

NB. For this purpose a dynamic list of hyperlinks to lists of such websites issued by the relevant bodies will be made publicly available.

Measures: crawling

Measure 1.3 Identify and comply with rights reservations when crawling the World Wide Web

- In this regard committing:
- to employ web-crawlers that read and follow instructions expressed in accordance with the Robot Exclusion Protocol (robots.txt);
- to identify and comply with other appropriate machine-readable protocols to express rights reservations pursuant to Article 4(3) of Directive (EU) 2019/790.

Measures: risks & complaints

Measure 1.4 Mitigate the risk of copyright-infringing outputs

- In this regard committing:
- to implement appropriate and proportionate technical safeguards to prevent their models from generating outputs that reproduce training content protected by Union law on copyright and related rights in an infringing manner;
- to include in their policies or documentation a prohibition against using their AI models for copyright infringement. For general-purpose AI models released under free and open source licenses, a similar prohibition should be included in the accompanying documentation, without affecting the freedoms granted by the open source license.

Measure 1.5 Designate a point of contact and enable the lodging of complaints

Safety and security

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Managing systemic risks

This chapter sets out a framework for managing systemic risks linked to advanced GPAI models. It applies only to providers of the most capable models subject to these specific obligations.

The chapter introduces ten Commitments and related Measures to guide compliance with these requirements.

> Article 55 AI Act
> Article 78 AI Act

Commitments: risk management

Commitment 1: requires signatories to adopt a Safety and Security Framework to manage systemic risks from their AI models. This involves creating the Framework (Measure 1.1), implementing it throughout the model lifecycle (Measure 1.2), and keeping it up to date (Measure 1.3). The Framework must cover risk assessment, mitigation, evaluation triggers, responsibilities, be confirmed before market release, and must be kept up to date.

> Articles 55(1) and 56(5), and recitals 110, 114, and 115 AI Act.

Commitment 2: Signatories commit to identifying the systemic risks stemming from the model, which involves two elements: (i) following a structured process to identify the risk (Measure 2.1), and (ii) developing systemic risk scenarios for each identified systemic risk (Measure 2.2).

> Articles 55(1) and recital 110 AI Act

Commitment 3: the purpose of systemic risk identification includes facilitating systemic risk analysis, which involves five (possibly overlapping) elements for each identified systemic risk: (i) gathering model-independent information (Measure 3.1), (ii) conducting model evaluations (Measure 3.2), (iii) modelling the systemic risk (Measure 3.3), and (iv) estimating the systemic risk (Measure 3.4), while (v) conducting post-market monitoring (Measure 3.5).

> Articles 55(1) and recital 114 AI Act

Commitments: mitigation

Commitment 4: Signatories commit to specifying systemic risk acceptance criteria and determining whether such risks stemming from the model are acceptable (Measure 4.1). Signatories commit to deciding whether to proceed with the development, the making available on the market, and/or the use of the model based on the systemic risk acceptance determination (Measure 4.2).

> Articles 55(1) AI Act

Commitment 5: Signatories commit to implementing appropriate safety mitigations along the entire model lifecycle to ensure the systemic risks stemming from the model are acceptable (pursuant to Commitment 4). Signatories will implement safety mitigations that are appropriate, including sufficiently robust under adversarial pressure (e.g. fine-tuning attacks or jailbreaking), considering the model's release and distribution strategy (Measure 5.1).

>Articles 55(1) and recital 114 AI Act

Commitment 6: Signatories commit to maintain strong cybersecurity for their AI models and infrastructure throughout their lifecycle, minimizing risks from unauthorized access, release, or theft.

> Articles 55(1), and recitals 114 and 115 AI Act

Commitments: reporting

Commitment 7: Signatories commit to submitting a detailed Safety and Security Model Report ("Model Report") to the AI Office before placing a model on the market (Measures 7.1–7.5), and to keep it updated (Measures 7.6 and 7.7).

- Key components of the Model Report are (i) model description and behavior (Measure 7.1), (ii) reasons for proceeding (Measure 7.2), (iii) systemic risk identification, analysis, and mitigation (Measure 7.3), (iv) external reports (Measure 7.4), and (v) material changes to the risk landscape (Measure 7.5).
- Signatories must keep the Model Report up to date (Measure 7.6) and provide it to the AI Office without redactions, unless restricted by national security laws (Measure 7.7). Updates are required when systemic risks change materially, and for the most capable models, at least every six months unless specific exemptions apply.

> Articles 55(1) and 56(5) AI Act

Commitment 8: Signatories commit to (i) defining clear responsibilities across all levels of the organization for managing systemic risks from their models (Measure 8.1), (ii) allocating appropriate resources to those responsible for systemic risk management (Measure 8.2), and (iii) promoting a healthy risk culture to support balanced, responsible decision-making about systemic risks (Measure 8.3).

> Articles 55(1) and recital 114 AI Act

Commitments: incident management

Commitment 9: Signatories must implement methods to identify serious incidents (Measure 9.1), report key information including harm, causes, and model involvement (Measure 9.2), and follow strict reporting timelines depending on the type of harm caused (Measure 9.3). Ongoing incidents require updates every four weeks, and final reports must be submitted within 60 days of resolution. All documentation must be retained for at least five years (Measure 9.4).

> Article 55(1), recitals 114 and 115 AI Act

Commitment 10:
- Signatories commit to maintaining detailed internal records on their models' architecture, integration, evaluations, and safety mitigations for at least ten years (Measure 10.1). They must also track key systemic risk processes and decisions, including justifications for chosen practices, and be ready to provide this to the AI Office upon request.
- If necessary for systemic risk assessment or mitigation, Signatories must publish summarised versions of their Framework and Model Reports (Measure 10.2), with appropriate redactions to protect safety and commercial interests. Publication is not required for models deemed similarly safe or safer (under Appendix 2.2 of this Chapter).

> Articles 53(1)(a) and 55(1) AI Act

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