EU AI Act Compliance Risk Management Capability Maturity Model

AI & Partners

Strategy – Formulating compliance strategies

The capability to formulate compliance strategies by taking into account the external long-term future risks /opportunities and the possible future internal capacity/ resources in order to achieve compliances objectives.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/ leadership about the importance and the way to formulate compliance strategies. This is reflected by the fact that attempts to formulate compliance strategies are only made ad hoc or not at all. If there are some attempts, there are no signs that these strategies are linked to compliance objectives.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to formulate compliance strategies. This is reflected by the fact that there are regular efforts to formulate compliance strategies, but the relation between these strategies and the compliance objectives rely on intuitive thoughts only. Furthermore, the compliance strategies cover some of the four risk genres: registering, filing, correct declaration and payment.	Awareness and understanding of the importance and the way to formulate compliance strategies are clear among management/leadership but still incomplete among the employees involved. This is reflected by the fact that compliance strategies are based on discussions, taking into account external long-term future risks/opportunities and possible future internal capacity/resources in order to achieve compliance objectives. Furthermore, some compliance strategies rely on new digital techniques and the strategies cover all four risk genres: registering, filing, correct declaration and payment.	Consciousness and understanding of the importance and the way to formulate compliance strategies are reaching high levels among management/leadership and all employees involved. This is reflected by the fact that there is a process in place describing how to formulate compliance strategies. Furthermore, the choice for how to finally formulate the compliance strategies rely on a documented analysis of several proposals, balancing external long-term future risks/opportunities and possible future internal strategical capacity, in order to select the best possible strategies to achieve the compliance objectives. The formulated compliance strategies have a focus on prevention and rely on up-to-date digitalization techniques. Finally, the activities related to formulating compliance strategies, and the strategies themselves, are monitored and reviewed regularly.	The way to formulate compliance strategies is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the facts that compliance strategies have a focus on future technologies and that they are formulated not only to increase business compliance but also serve as a driver to bring the business to higher capacity levels, in an ongoing attempt to improve and adjust. Finally, all of this is supported by a proactive attitude, meaning that management/ leadership and involved employees engage in proposing improvements regarding the process and the activities to formulate compliance strategies.

Help questions:

- Can you describe the current compliance strategies?
- Can you describe how the business monitors, reviews and improves the process of formulating compliance strategies?
- Can you describe the current process and activities related to formulating compliance strategies?
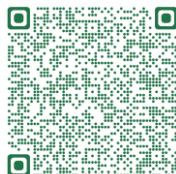
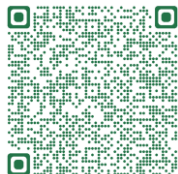# EU AI Act Compliance Risk Management Capability Maturity Model

Strategy – Implementing compliance strategies

The capability to implement compliance strategies by gaining employee involvement, acceptance and understanding in order to turn the strategies into actions and thus achieve the compliance objectives.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to implement compliance strategies. This is reflected by the fact that attempts to implement compliances strategies are only made ad hoc or not at all. If there are some attempts, there are no signs that the implementing activities address the employees' involvement, understanding and acceptance.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to implement compliance strategies. This is reflected by the fact that there are regular efforts to implement compliance strategies, but they rely only on intuitive assumptions on how to do it. Furthermore, most of the implementation activities rely on a one-way communication rather than a two-way-communication between management/ leadership and employees.	Awareness and understanding of the importance and the way to implement compliance strategies are clear among management/ leadership but still incomplete among the employees involved. This is reflected by the fact that the implementing activities are based on discussions, taking into account how to gain the employees' involvement, understanding and acceptance. Furthermore, the implementation activities rely on a two-way communication and are adjusted to the various employees' specific needs and/or their role in the implementation.	Consciousness and understanding of the importance and the way to implement compliance strategies are reaching high levels among management/leadership and all employees involved. This is reflected by the fact that the choice for how to implement the compliance strategies rely on a documented analysis of several proposals, in order to select the best possible activities to gain the employees' involvement, understanding and acceptance. Furthermore, the two-way communication relies on up-to date digital techniques and the know-how to examine and close the gap between the values underpinning the compliance strategies on one hand, and attitudes and values held by the employees (acceptance) on the other hand. Finally, the activities to implement the compliance strategies are regularly monitored and reviewed.	The way to implement compliance strategies is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that regular activities (for example surveys) monitor the employees' involvement, understanding and acceptance regarding the compliance strategies. Finally, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements regarding the activities to implement compliance strategies.

Help questions:

- Can you describe the activities for implementing compliance strategies?
- Can you describe how the business communicates the compliance strategies to various employees?
- Can you describe the way employees understand how compliance strategies are linked to achieving compliance objectives?

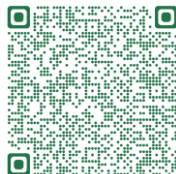# EU AI Act Compliance Risk Management Capability Maturity Model

Knowledge of external context – Differentiating businesses

The capability to differentiate businesses, by using relevant methods, in order to address business needs and compliance risks .

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to differentiate businesses. This is reflected by the fact that attempts to differentiate businesses are only made ad hoc or not at all. If there are some attempts, there are no signs that the method used to differentiate businesses addresses businesses needs or the observed compliance risks.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to differentiate businesses. This is reflected by the fact that there are regular efforts to differentiate businesses, but they rely only on intuitive assumptions of how these differentiations address both the businesses' needs and the observed compliance risks.	The awareness and understanding of the importance and the way to differentiate businesses are clear among management/leadership but still incomplete among the employees involved. This is reflected by the fact that the method to differentiate businesses is based on discussions. Furthermore, digital tools and data models are in place, as well the know-how to use them.	Consciousness and understanding of the importance and the way to differentiate businesses are reaching high levels among management/ leadership and all employees involved. This is reflected by the fact that the choice for how to differentiate businesses rely on documented analysis of several proposals, in order to select the best possible way to differentiate businesses and to address both the businesses' needs and the observed compliance risks. Furthermore, the principles defining the rules differentiating businesses, and the problems associated with differentiating businesses (such as overlaps and unclear boundaries) are documented and made transparent for all employees involved. Finally, the activities are regularly monitored and reviewed.	The way to differentiate businesses is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that up-to-date digital techniques are available and mastered as a precondition for facilitating and visualizing the differentiating work. Finally, all of this is supported by a proactive attitude, meaning that management/ leadership and involved employees engage in proposing improvements regarding the activities to differentiate businesses.

Help questions:

- Can you describe the current activities to differentiate businesses?
- In what way do the activities to differentiate businesses address the businesses' needs and the observed compliance risks?
- Can you describe how the business monitors, reviews and improves the activities used to differentiating itself?

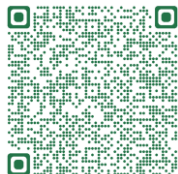# EU AI Act Compliance Risk Management Capability Maturity Model

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Knowledge of external context – Forecasting the future

The capability to forecast the future by using relevant analytic methods & business intelligence tools in order to formulate compliance strategies addressing long-term future risks and opportunities & to adjust existing compliance strategies to medium- and short-term future risks and opportunities.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to forecast the external future development. This is reflected by the fact that attempts to forecast the future are only made ad hoc or not at all. If there are some attempts, there are no signs that these forecasting activities address long-term future compliance risks and opportunities in order to formulate compliance strategies.	Awareness starts to spread among management/leadership, although with limited understanding about the way to forecast the external future development. This is reflected by the fact that there are regular efforts to forecast the future, but the focus of these efforts rely on intuitive assumptions only. Furthermore, the intelligence gathering information are done without making use of digital techniques such as to scan the Internet.	The awareness and understanding of the importance and the way to forecast the external future development are clear among management/leadership but is still incomplete among the employees involved. This is reflected by the fact that the activities to forecast the future are based on discussions, taking into account what the intelligence should focus on and which analytic methods/business intelligence tools to use, to support that these activities are relevant to address long-term future compliance risks and opportunities. Furthermore, the forecasting activities address the following areas: economy, demography, globalization and digitalization. Finally, business intelligence tools and the use of scenario analyses, trend analyses, consequences trees and similar, are in place.	Consciousness and understanding of the importance and the way to forecast the future are reaching high levels among management/leadership and all employees involved. This is reflected by the facts that there is a process in place describing how to forecast the future and that activities to forecast the future are based on a documented analysis of several proposals in order to decide what to focus the intelligence on and select the best possible methods and tools for forecasting the future. Furthermore, this documented analysis highlights the key uncertainties in forecasting the future by taking different competing future scenarios into account. Finally, the activities to forecast the future are regularly monitored and reviewed.	The way to forecast the future is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that indicators are being developed to monitor whether reality is developing as predicted, and to learn from it. Furthermore, there is an overall readiness to change and consider alternative views of the future. Finally, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements regarding the process and the activities to forecast the future.

Help questions:

- Can you describe the current process and activities of forecasting the future?
- Can you describe the underlying analysis of forecasting the future?
- Can you describe the main areas covered by the intelligence work

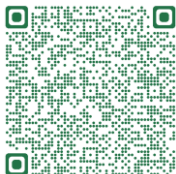# EU AI Act Compliance Risk Management Capability Maturity Model

Knowledge of external context – Knowing the reasons why businesses are compliant or not

The capability to describe and explain the reasons why businesses are compliant or not by using relevant information, methods, theories and expertise in order to understand how to support future compliance and prevent future non-compliance.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to describe and explain why businesses are compliant or not. *This is reflected by the fact that attempts to describe and explain why businesses are compliant or not, are only made ad hoc or not at all.* *If there are some attempts, there are no signs that this knowledge has been used to improve future compliance.*	*Awareness starts to spread among management/leadership, although with limited understanding about the way to describe and explain why businesses are compliant or not.* *This is reflected by the fact that there are regular efforts to describe and explain why businesses are compliant or not, but these efforts rely only on intuitive assumptions on how to create this knowledge and how to use this knowledge to improve future compliance.* *Furthermore, there is the know-how for collecting, analysing and transforming data into knowledge.*	*The awareness and understanding of the importance and the way to describe and explain why businesses are compliant or not, are clear among management/leadership but still incomplete among the employees involved.* *This is reflected by the fact that the activities to describe and explain why businesses are compliant or not are based on discussions, taking into account validated methods and compliance theories explaining the underlying causes of businesses' behaviour.* *Furthermore, the descriptions and explanations are used as an input for formulating compliance strategies and for generating alternatives in how to treat risks.*	*Consciousness and understanding of the importance and the way to describe and explain why businesses are compliant or not, are reaching high levels among management/ leadership and all employees involved.* *This is reflected by the fact that there is a process in place, describing how to create knowledge in different CRM situations with the help of validated methods.* *Furthermore, the activities to describe and explain why businesses are compliant or not, are based on a documented analysis of several proposals for how to acquire reliable data, what methods to choose and how to categorize and analyse the material, in order to transform data and information into knowledge.* *Finally, methods are mastered to examine the underlying causes why businesses are compliant or not through theories (deductive) and data acquisition (inductive). Uncertainties are highlighted in a transparent way and the activities are regularly monitored and reviewed.*	*The way to describe and explain why businesses are compliant or not is constantly improved by learning from past experience and by involving external experts and sources.* *This is reflected by the fact that there is an awareness of knowledge gaps and that the business has an idea in which order to fill them, included a readiness to adjust current knowledge and methods when needed.* *Furthermore, prejudices among employees regarding the reasons behind non-compliance behaviour, are identified and managed.* *Finally, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements both regarding the process and the activities to describe and explain why businesses are compliant or not.*

Help questions:

- Can you describe the current process and activities by which the business analyses the reasons why it is compliant or not?
- Can you assess the degree to which the knowledge is taken into account in the compliance strategies formulation?

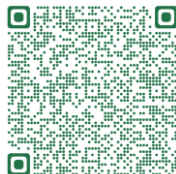# EU AI Act Compliance Risk Management Capability Maturity Model

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Knowledge of external context – Knowing how to influence businesses

The capability to know how to influence business behaviour by using relevant information, methods, theories and experts in order to stimulate business EU AI Act compliance.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to influence businesses' behaviour.

This is reflected by the fact that attempts to influence businesses' behaviour are only made ad hoc or not at all.

If there are some attempts, there are no signs that these have improved the compliance. | Awareness starts to spread among management/leadership, although with limited understanding about the way to influence businesses' behaviour.

This is reflected by the fact that there are regular efforts to influence businesses' behaviour, but they rely only on intuitive assumptions about the relation between activities and their expected impact on businesses' behaviour.

Furthermore, the primarily idea is that businesses' behaviour can only be impacted by deterrence, audits and sanctions.

Finally, there is the know-how for collecting, analysing and transforming data into knowledge. | The awareness and understanding of the importance and the way to influence businesses' behaviour are clear among management/leadership but still incomplete among the employees involved.

This is reflected by the fact that the choice of methods to influence businesses' behaviour is based on discussions, taking into account deliberately chosen theories on how to effectively impact businesses' behaviour.

Furthermore, efforts to influence businesses rely on a mix of activities, such as nudging, increasing awareness and deterrence.

Finally, the ways to influence businesses' behaviour make use of digital techniques but proactive methods are still not the predominating choice. | Consciousness and understanding of the importance and the way to influence businesses' behaviour are reaching high levels among management/leadership and all employees involved.

This is reflected by the fact that the choice for how to influence businesses' behaviour rely on a documented analysis of several proposals, in order to select the best possible way to improve the compliance.

Furthermore, the business masters competencies in the fields of social and human sciences focusing on general ways and up to date models to change human behaviour in the desired way.

Finally, proactive methods are used whenever possible. The activities are regularly monitored and reviewed. | The way to influence businesses' behaviour is constantly improved by learning from past experience and by involving external experts and sources.

This is reflected by the fact that the outcome of these activities is evaluated and used to improve future activities.

Finally, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements regarding the activities to influence businesses' behaviour. |

Help questions:

- Can you describe the current activities through which the business learns how to influence its stakeholders?
- Can you describe the underlying analysis used to influence stakeholders?
- Can you assess the degree to which the knowledge of how to influence stakeholders is taken into account in the compliance strategies formulation and implementation?

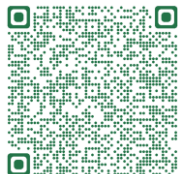# EU AI Act Compliance Risk Management Capability Maturity Model

Decision-Making – Defining, describing and explaining risks and opportunities

The capability to define, describe and explain risks and opportunities by using multiple internal and external sources in order to agree on facts and as a base to generate alternatives in how to treat risks and how to make use of opportunities.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to define, describe and explain risks and opportunities.

This is reflected by the fact that attempts to define, describe and explain risks and opportunities are only made ad hoc or not at all.

If there are some attempts, there are no signs that the definitions, descriptions and explanations are relevant to generate alternatives for actions to treat risks or to make use of opportunities. | Awareness starts to spread among management/leadership, although with limited understanding, about the way to define, describe and explain risks and opportunities.

This is reflected by the fact that there are regular efforts to define, describe and explain risks and opportunities, but they rely only on intuitive assumptions on how they will generate alternatives for actions to treat risks or to make use of opportunities.

Furthermore, only internal sources of information are used to define, describe and explain risks and opportunities. | Awareness and understanding of the importance and the way to define, describe and explain risks and opportunities are clear among management/leadership but still incomplete among the employees involved.

This is reflected by the fact that the way risks and opportunities are defined, described and explained are based on discussions, leading to an agreement on the facts to use as a base generating alternatives for actions to treat risks or to make use of opportunities.

Furthermore, both internal and external sources are used to define, describe and explain risks and opportunities. The compliance objectives have a prominent significance in the discussions. | Consciousness and understanding of the importance and the way to define, describe and explain risks and opportunities are reaching high levels among management/ leadership and all employees involved.

This is reflected by the fact that there is a process in place describing how to define, describe and explain risks and opportunities.

Furthermore, the definition, description and explanation of the risks and opportunities is supported by a documented analysis focusing on which compliance objectives are at risk or could be better attained by making use of the opportunities.

Finally, the activities to define, describe and explain risks and opportunities are regularly monitored and reviewed. | The way to define, describe and explain risks and opportunities is constantly improved by learning from past experience and by involving external experts and sources.

This is reflected by the fact that all the definitions, descriptions and explanations start with identifying the relevant compliance objectives and highlighting the key uncertainties.

Furthermore, all of this is supported by a proactive attitude, meaning that both management/leadership and involved employees engage in proposing improvements regarding both the process and the activities to define, describe and explain risks and opportunities. |

Help questions:

- Can you describe how your business currently defines, describes and explains risks and opportunities?
- How do you think the work impact the possibilities to generate alternatives for how to treat risks/take advantage of opportunities?
- Can you describe the signs indicating that the way to define, describe and explain risks and opportunities is influenced by which compliance objectives are at risk?

EU AI Act Compliance Risk Management Capability Maturity Model

Decision Making – Generating alternatives

The capability to generate alternatives to treat risks and/or take advantage of opportunities relevant to the compliance objectives, based on information obtained by multiple internal and external sources and idea generation techniques, in order to increase the probability of choosing the most successful action.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to generate alternatives to treat risks and/or take advantage of opportunities. This is reflected by the fact that attempts to generate alternatives are only made ad hoc or not at all. If there are some attempts, there are no signs that these alternatives have a link with the compliance objectives.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to generate alternatives. This is reflected by the fact that there are regular efforts to generate alternatives, but the relation between these alternatives and the compliance objectives rely on intuitive thoughts only. Furthermore, the alternatives are all made up of reactive actions.	Awareness and understanding of the importance and the way to generate alternatives are clear among management/leadership but still incomplete among the employees involved. This is reflected by the fact that alternatives are generated through discussions, using idea generation techniques and relevant sources of information resulting in an agreement of the pros and cons of each alternative in relation to the compliance objectives. Furthermore, these alternatives are a mix of reactive and proactive actions and some of the alternatives rely on new digital techniques.	Consciousness and understanding of the importance and the way to generate alternatives are reaching high levels among management/leadership and all employees involved. This is reflected by the facts that there is a process in place describing how to generate alternatives in general and that several idea generation techniques are mastered. Furthermore, the generated alternatives are supported by a documented analysis specifying the estimated outcome of each alternative and the key uncertainties, and verifying why and how each alternative will increase the probability of attaining the compliance objectives. Most of these alternatives are problem-oriented and focusing on eliminating or reducing the effects or causes of these problems. Finally, the activities to generate alternatives are regularly monitored and reviewed.	The way to generate alternatives are constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the business masters the way to discover, invent, and design new courses of actions. Furthermore, the alternatives make use of up-to-date digital techniques whenever possible. Finally, all of this is supported by a proactive attitude, meaning that both management/leadership and involved employees engage in proposing improvements both regarding the process and the activities to generate alternatives.

Help questions:

- Can you describe how your business currently generates alternatives to treat risks/take advantage of opportunities?
- Can you describe the underlying analysis specifying the estimated outcome of each alternative taking in to account the compliance objectives, strategies and the key uncertainties?
- In what way do the alternatives focus on eliminating or reducing the effects or causes of these problems?

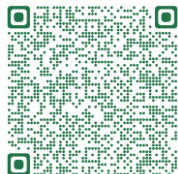# EU AI Act Compliance Risk Management Capability Maturity Model

Decision Making – Making Decisions

The capability to evaluate, compare and make a choice among several relevant alternatives, guided by facts and values and taking uncertainties and risk appetite/tolerance into account, in order to effectively stimulate compliance.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to evaluate, compare and make a choice among several alternatives. This is reflected by the fact that attempts to evaluate, compare and make a choice among several alternatives are only made ad hoc or not at all. If there are some attempts, there are no signs that these choices are linked to compliance objectives.	Awareness starts to spread among management/ leadership, although with limited understanding, about the way to evaluate, compare and make a choice among several alternatives. This is reflected by the fact that there are regular efforts to make choices, but the relation between these choices and the compliance objectives rely on intuitive thoughts only. Furthermore, most choices are focused on reactive actions, not proactive actions. Choices address symptoms rather than root causes.	Awareness and understanding of the importance and the way to evaluate, compare and make a choice among several alternatives are clear among management/leadership but still incomplete among the employees involved. This is reflected by the fact that choices are the result of discussions, taking into account facts, compliance objectives, key uncertainties, expected outcome, costs and risk appetite/tolerance. Furthermore, the business masters different 'decision-making techniques' (e.g. decision-trees). Finally, most choices address root causes.	Consciousness and understanding of the importance and the way to evaluate, compare and make a choice among several alternatives are reaching high levels among management/ leadership and all employees involved. This is reflected by the fact that there is a process in place describing how to make choices including, among others, defined principles for deciding how much uncertainty and risks to accept. Furthermore, the choices themselves are based on a documented analysis specifying the key uncertainties, the values that really matter in the specific choice situation, the link to other decisions, the arguments for how and why these choices will effectively stimulate compliance, and the arguments for choosing a certain alternative instead of another. Finally, some employees master the field of decision-theory and the activities are regularly monitored and reviewed.	The way to make choices is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the business considers facts and values that really matter, key uncertainties, risk appetite/tolerance and links to other decisions in a balanced way. Furthermore, the business is planning ahead by making choices with different timelines, taking the probability for successful implementation into account. Finally, all of this supported by a proactive attitude, meaning that both management/leadership and involved employees engage in proposing improvements both regarding the process and the activities to make choices.

Help questions:

- Can you describe how your business currently evaluates, compares and makes a choice among the available / generated alternatives?
- Can you describe the underlying analysis to evaluate, compare and make a choice among several alternatives?
- Describe the role the compliance objectives have when doing choices? Do discussions about choices start from the compliance objectives or alternatives as such?
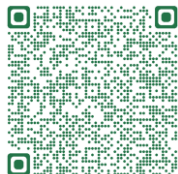
Decision Making – Implementing decisions

The capability to implement decisions in a structured way by having an implementation process and plan and cooperation between the decision makers and the decision implementers in order to generate the intended outcome.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to implement decisions. This is reflected by the fact that attempts to implement decisions are made only ad hoc or not at all. If there are some attempts, there are no signs that the implementations are corresponding to the decision maker's intentions.	Awareness starts to spread among management/ leadership, although with limited understanding, about the way to implement decisions. This is reflected by the fact that there are regular efforts to implement decisions, but the relation between these efforts and the decision maker's intentions rely on intuitive thoughts only. Furthermore, in what order things are carried out to implement decisions rely on intuitive thoughts only. The interaction between decision makers and implementers rely on intuitive initiatives only.	Awareness and understanding of the importance and the way to implement decisions are clear among management/leadership but still incomplete among the employees involved. This is reflected by the fact that the way to implement a decision is the result of a discussion, leading to a structured implementation plan based on arguments supporting how and why the implementation plan will generate the expected outcome. Furthermore, the implementation plan is accepted by both the decisions makers and the implementers. Finally, there is an ongoing interaction between the decision makers and the implementers during the time of the implementation plan.	Consciousness and understanding of the importance and the way to implement decisions are reaching high levels among management/leadership and all employees involved. This is reflected by the fact that there is a process in place as an overall guide for how to implement decisions in general. Furthermore, the implementations are supported by a document specifying objectives, activities, timelines, resources, capacity needed and expected difficulties. This is complemented by an analysis of how and why the activities will generate the intended outcome. Finally, the activities to implement decisions are regularly monitored and reviewed.	The way to implement decisions is constantly improved by learning from past experience and by using external experts and sources. This is reflected by the fact that the business is prepared to adjust decisions or implementation plans when new important circumstances emerge during the process of implementation. Finally, all of this is supported by a proactive attitude, meaning that both management/leadership and involved employees engage in proposing improvements both regarding the process and the activities to implement decisions.

Help questions:

- Can you describe the current activities to implement decisions?
- Can you describe how the decision makers communicate their decisions and how they interact with the implementers?
- If there is an implementation plan in place, how is it elaborated, who is involved and how does it describe different roles?

EU AI Act Compliance Risk Management Capability Maturity Model

Organisation – Leadership

The capability to train, promote and support a leadership style in order to provide the right conditions for employees involved to perform an effective CRM work.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among the management of the business about the importance and the way to acquire leadership serving as a driver to perform an effective CRM. This is reflected by the fact that attempts to train leadership to serve as a driver are made ad hoc or not at all. If there are some attempts, there are no signs that they are improving the CRM effectiveness.	Awareness starts to spread among the management of the business, although with limited understanding about the way to acquire leadership serving as a driver to perform an effective CRM. This is reflected by the fact that the management has an intuitive idea of which aspects of leadership are important when it comes to serve as a driver. Furthermore, there are regular efforts to train leadership to serve as a driver in order to perform an effective CRM but these efforts rely on intuitive thoughts only.	Awareness and understanding of the importance and the way to acquire leadership serving as a driver to perform an effective CRM is clear among management but still incomplete among the leaders involved. This is reflected by the fact that the desired leadership competencies are the result of a discussion, based on arguments supporting how and why these competencies will improve the CRM effectiveness. Furthermore, there are activities in place to train leadership in how to motivate and support the employees involved and to provide the right conditions for them in order to perform an effective CRM. Finally, the management/leadership regularly clarifies the compliance strategies and objectives to the employees involved.	Consciousness and understanding of the importance and the way to acquire leadership serving as a driver to perform an effective CRM is reaching high levels among management. This is reflected by the fact that the choice for which leadership competencies are needed and the way to acquire them, is based on a documented analysis, comparing several options of leadership regarding how to motivate and support the employees and to provide the right conditions for them in order to perform an effective CRM. Furthermore, leadership masters all the steps in the CRM process and understands how they all relate to each other. They know how to motivate and support the employees. Finally, the leadership style, regarded as a driver to perform an effective CRM, is regularly monitored and reviewed.	The way the leadership provides the right conditions for the employees to perform an effective CRM by motivating, promoting and supporting the employees involved, is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the leadership provides opportunities and encourages the employees to proactively engage in continuous self-development and learning, adapted to the development of CRM. Finally, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements for how leadership can serve as a driver to perform an effective CRM.

Help questions:

- Can you describe the current leadership style and how this serves as a driver to perform an effective CRM?
- What activities are in place to bridge the gap between the needed competencies and skills for leadership compared to the existing ones, in order to serve as a driver to perform an effective CRM?
- Can you describe how the business monitors, reviews and improves the degree to which its leadership serves as a driver to perform an effective CRM?

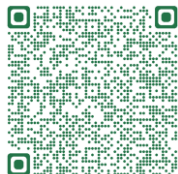# EU AI Act Compliance Risk Management Capability Maturity Model

Organisation – Risk culture

The capability to align employee behaviour to the desired risk culture by communication and education, including providing a common language in order to 'reinforce' the compass to act and decide in all situations in the CRM process.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to define a desired risk culture and to align employee behaviour with it. This is reflected by the fact that attempts to define a desired risk culture and to align employee behaviour with it are only made ad hoc or not at all. If there are some attempts, there are no signs that these are directing the employees to act and decide in accordance with the compliance strategies.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to define a desired risk culture and to align employee behaviour with it. This is reflected by the fact that management/leadership has an intuitive idea about what the desired risk culture should look like. This is expressed by describing and communicating the values of the business, its risk appetite/ tolerance, its approach to risks, and the desired attitudes for the employees. Furthermore, there are regular efforts to align employee behaviour with the existing compliance strategies and objectives, but these efforts rely on intuitive thoughts only.	Awareness and understanding of the importance and the way to define a desired risk culture and to align employee behaviour with it are clear among management/leadership but still incomplete among the employees involved. This is reflected by the fact that the desired risk culture is the result of a discussion, based on arguments supporting how and why this culture will contribute to the compliance objectives. Furthermore, there are activities in place, such as communication and education, including to provide a common language, as a result of discussions based on arguments supporting that these activities will serve to align employee behaviour with the well-founded desired risk culture. There is a standard compliance risk management taxonomy in place, explaining key vocabulary. Finally, management/leadership has identified and removed barriers preventing the employees to align with the desired risk culture.	Consciousness and understanding of the importance and the way to define a desired risk culture and to align employee behaviour with it are reaching high levels among management/leadership and all employees involved. This is reflected by the fact that the choice for how to align employee behaviour with the desired risk culture is based on a documented analysis, comparing several options for how to make use of communication, education and common language, in order to fill the gap between the desired risk culture and the existent behaviour and attitudes regarding CRM. Furthermore, the business is able to apply the theories on how to influence employees' attitudes and behaviour in order to achieve the desired risk culture.	The way to align employee behaviour with the desired risk culture is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the gap between the current risk culture and the desired one is continually examined and adjusted to reinforce the compass for the employees to act and decide correctly in all situations in the CRM process. Finally, all of this is supported by a proactive attitude, meaning that both management/leadership and involved employees engage in proposing how to adjust cultural performance to the desired performance.

Help questions:

- Can you describe the current risk culture?

EU AI Act Compliance Risk Management Capability Maturity Model

Organisation – Organisational structure

The capability to have an organisational structure by defining teams, functions, responsibilities and relations in a complimentary way to promote an effective CRM process.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to have an organisational structure that promotes an effective CRM process. This is reflected by the fact that attempts to define teams, functions, responsibilities and relations in a complementary way are only made ad hoc or not at all. If there are some attempts, there are no signs that these are promoting an effective CRM process.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to have an organisational structure that promotes an effective CRM process. This is reflected by the fact that the management/ leadership understands the concepts of functions, teams, responsibilities and relations but has intuitive thoughts only of how these concepts can be connected in a complementary way.	Awareness and understanding of the importance and the way to have an organisational structure that promotes an effective CRM process is clear among management/leadership but still incomplete among the employees involved. This is reflected by the fact that there is an organisational structure in place based on discussions on how to define teams, functions, responsibilities and relations in a complementary way in order to promote an effective CRM process. Furthermore, there is an organisational chart (organogram) in place which is communicated to all employees involved.	Consciousness and understanding of the importance and the way to have an organisational structure that promotes an effective CRM process is reaching high levels among management/ leadership and all employees involved. This is reflected by the fact that the choice for how to organise the structure is based on a documented analysis, comparing several options for how to organise structure with defined teams, functions, responsibilities and relations, and the way they complement each other in order to promote an effective CRM process. Furthermore, management/leadership is able to apply the essential parts of organisational theory regarding the organisation of an effective structure. The employees involved in the CRM process accept their roles and understand the relationship between functions, teams and responsibilities, and how they complement each other.	The way to organise a structure promoting an effective CRM process is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the management/ leadership continually checks if the organisational structure is still adapted to the developments in the CRM process. Finally, all of this is supported by a proactive attitude, meaning that both management/leadership and involved employees engage in proposing improvements regarding the organisational structure in order to support an effective CRM process.

Help questions:

- Can you describe how the current organisational structure promotes an effective CRM process?
- Can you describe the current activities to promote an adequate CRM organisational structure?
- Can you describe the underlying analysis to the current organisational structure?

EU AI Act Compliance Risk Management Capability Maturity Model

Organisation – Acquiring and developing competencies

The capability to acquire employees with adequate competencies regarding relevant fields and tasks in the CRM process, by recruiting, retaining, educating and training a sufficient number of employees, in order to perform an effective CRM.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to build or acquire relevant competencies to perform an effective CRM. This is reflected by the fact that attempts to acquire employees with the adequate competencies are only made ad hoc or not at all. If there are some attempts, there are no signs that these competencies are improving the CRM effectiveness.	Awareness starts to spread among management/leadership, although with limited understanding about the way to build or acquire relevant competencies to perform an effective CRM. This is reflected by the fact that management/leadership has intuitive ideas about which competencies are needed to perform an effective CRM. Furthermore, there are regular efforts to acquire employees with the adequate competencies, but these efforts rely on intuitive thoughts only and it is not clear that they improve the CRM effectiveness.	Awareness and understanding of the importance and the way to build or acquire relevant competencies to perform an effective CRM are clear among management/leadership but is still incomplete among the employees involved. This is reflected by the fact that activities to recruit, retain, educate and train employees to perform CRM are in place as the result of discussions, based on arguments supporting how and why these activities are relevant to perform an effective CRM. Furthermore, there exists a document describing the competencies needed for different CRM roles and there are training sessions to explain those competencies to the employees involved.	Consciousness and understanding of the importance and the way to build or acquire relevant competencies to perform an effective CRM are reaching high levels among management/leadership and all employees involved. This is reflected by the fact that there are processes in place to recruit, retain, educate and train employees to perform CRM. The processes are based on a documented analysis, comparing several options for competencies needed for different CRM roles. Furthermore, the business has defined the gap between the competencies needed to perform an effective CRM and the available competencies, and has a plan on how to bridge that gap. The business is able to use e-learning as a way to educate and train the employees involved.	The way to build or acquire relevant competencies to perform an effective CRM is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the competencies are regularly adapted to the development of CRM. Finally, all of this is supported by a proactive attitude, meaning that management/ leadership and involved employees engage in proposing improvements both regarding the processes and the activities to build or acquire the necessary competencies.

Help questions:

- Can you describe the degree to which your business has employees with the adequate competencies to perform an effective CRM?
- Can you describe the current activities to build or acquire employees with the adequate competencies to perform an effective CRM?
- Can you describe how the business monitors, reviews and improves the processes and activities to recruit, retain, educate and train employees in order to improve CRM effectiveness?

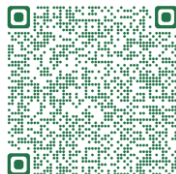# EU AI Act Compliance Risk Management Capability Maturity Model

Organisation – Managing knowledge

The capability to manage knowledge related to CRM through a systematic process (create, store, share, use and update knowledge) supported by technical tools (to store, share and search knowledge) in order to enhance performance doing CRM.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to manage CRM related knowledge. This is reflected by the fact that attempts to manage CRM related knowledge are only made ad hoc or not at all. If there are some attempts, there are no signs that these attempts are improving the CRM performance.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to manage CRM related knowledge. This is reflected by the fact that there are regular efforts to manage CRM related knowledge but the expectation that these efforts will improve the CRM performance relies on intuitive thoughts only. Furthermore, some tools for storing and sharing CRM related knowledge are available.	Awareness and understanding of the importance and the way to manage CRM related knowledge is clear among management/leadership but still incomplete among the employees involved. This is reflected by the fact that there is a knowledge management in place as the result of discussions, based on arguments supporting which type of knowledge to take into account in order to improve the CRM performance. Furthermore, the business is supported by relevant software(s) to cover the different aspects of the knowledge management process (create, store, share, use & update).	Consciousness and understanding of the importance and the way to manage CRM related knowledge are reaching high levels among management/leadership and all employees involved. This is reflected by the fact that there is a knowledge management process in place, based on a documented analysis, comparing several options for how to create, store, share, use and update knowledge. Furthermore, the business has a view on which knowledge is still missing and has a plan for how to close the gap. The usefulness of managing knowledge, and the way to do it, is documented and communicated to all employees involved. Finally, the process and the tools to manage CRM related knowledge are regularly monitored and reviewed.	The way to manage knowledge is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the system of knowledge management, using up-to-date software, continually contributes to adapt the knowledge to changing circumstances. Finally, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements both regarding the process and the activities related to the creation, storing, sharing, using and updating the CRM knowledge.

Help questions:

- Can you describe the current activities your business performs to have an adequate CRM knowledge management?
- Can you describe the underlying analysis behind the CRM knowledge management?
- Can you describe how the business monitors, reviews and improves the degree to which its CRM knowledge management contributes to improve the CRM performance?

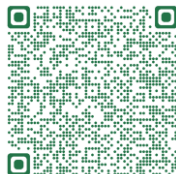# EU AI Act Compliance Risk Management Capability Maturity Model

Organisation – Fostering creativity and innovation

The capability to have a creative and innovative environment by providing the necessary HR conditions - expertise, creative and innovative thinking skills - in order to support an effective CRM.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/ leadership about the importance and the way to foster a creative and innovative environment. This is reflected by the fact that attempts to generate creative and innovative ideas in order to support an effective CRM are only made ad hoc or not at all. If there are some attempts, there are no signs that these attempts are supporting an effective CRM.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to foster a creative and innovative environment. This is reflected by the fact that there are regular efforts to provide the conditions needed to be creative and innovative, but the expectation that these conditions will generate creative and innovative ideas supporting an effective CRM, rely on intuitive thoughts only.	Awareness and understanding of the importance and the way to foster a creative and innovative environment is clear among management/ leadership but still incomplete among the employees involved. This is reflected by the fact that there are conditions for a creative and innovative environment in place as the result of discussions, taking into account how to organise activities like brainstorming sessions and workshops as a way to identify new thoughts and to transform them into concrete actions to support an effective CRM.	Consciousness and understanding of the importance and the way to foster a creative and innovative environment are reaching high levels among management/leadership and all employees involved. This is reflected by the fact that the chosen conditions to provide a creative and innovative environment are based on a documented analysis, comparing several options for how to encourage, organise and reward creativity and innovation in order to support an effective CRM. Furthermore, the management/leadership can apply the theories on how to successfully provide a creative and innovative environment. The involved employees have the necessary skills and participate in creative and innovative activities on a regular and organised basis. Finally, there is a process in place for how to collect, examine, select and make use of ideas that emerge from these activities. The conditions for having a creative and innovative environment are regularly monitored and reviewed.	The way to foster a creative and innovative environment is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that creative and innovative thinking and behaviour is cultivated as a natural feature of CRM work. Furthermore, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements regarding activities related to provide a creative and innovative environment.

Help questions:

- Can you describe the current activities your business performs to foster a creative and innovative environment?
- Can you describe the underlying analysis behind the development of a creative and innovative environment?
- Can you describe how the business monitors, reviews and improves the degree to which it promotes a creative and innovative environment?

EU AI Act Compliance Risk Management Capability Maturity Model
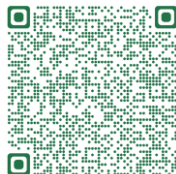
AI & Partners

Organisation – Communication

The capability to communicate the compliance strategies, objectives and outcomes by addressing relevant information to the different parts of the administration, using appropriate communication channels and frequencies in order to create understanding and insight of these aspects within the entire business.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to communicate the compliance strategies, objectives and outcomes. This is reflected by the fact that attempts to communicate are made only ad hoc or not at all. If there are some attempts, there are no signs that these communications are creating understanding and insight in the compliance strategies, objectives and outcomes among the involved employees.	Awareness starts to spread among management/leadership, although with limited understanding about the way to communicate the compliance strategies, objectives and outcomes. This is reflected by the fact that there are regular efforts to communicate about CRM, but the expectation that these efforts will create understanding and insight in the compliance strategies, objectives and outcomes among the involved employees rely on intuitive thoughts only.	Awareness and understanding of the importance and the way to communicate the compliance strategies, objectives and outcomes are clear among management/ leadership but still incomplete among the employees involved. This is reflected by the fact that the communication activities are the result of discussions, taking into account communication theories for how to address relevant information, using the appropriate communication channels and frequency to each specific group of employees. Furthermore, the communication is seen as a way to stimulate the employees' behaviour, in accordance with the compliance strategies.	Consciousness and understanding of the importance and the way to communicate the compliance strategies, objectives and outcomes are reaching high levels among management/ leadership and all employees involved. This is reflected by the fact that the communication activities are based on a documented analysis, comparing several options for how to address relevant information, using the appropriate communication channels and frequency to each specific group of employees, in order to create understanding and insight in the compliance strategies and objectives. Furthermore, communication gaps are identified and solved by communicating the missing information to the group(s) of employees who need it, in an adequate way by using an appropriate mix of channels and frequencies. The employees involved in the communication work know how to use communication as a way to influence the employees' behaviour and they are also able to use the latest electronic possibilities for communication purposes	The way to communicate the compliance strategies, objectives and outcomes is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the communication strategy is flexible enough to continuously adjust to an evolving external and internal context. Finally, all of this is supported by a proactive attitude, meaning that management/ leadership and involved employees engage in proposing improvements regarding the activities to communicate the compliance strategies, objectives and outcomes.

Help questions:

- Can you describe the current activities your business performs to communicate CRM work internally?
- Can you describe the underlying analysis behind the communication of CRM internally?

EU AI Act Compliance Risk Management Capability Maturity Model

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Organisation – Extracting, managing and ensuring data

The capability to manage data by extracting relevant data from various internal and external sources and to ensure its qualit y and availability in order to support all the steps in the CRM process.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to manage data. This is reflected by the fact that attempts to manage data in order to support the CRM process are only made ad hoc or not at all. If there are some attempts, there are no signs that the managed data is useful for the CRM process.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to manage data. This is reflected by the fact that there are regular efforts to provide the business with data from internal and external sources, covering the main sectors but the expectation that these data will support the CRM process relies on intuitive thoughts only.	Awareness and understanding of the importance and the way to manage data are clear among management/leadership but still incomplete among employees involved. This is reflected by the fact that the business possesses large volumes of data as the result of discussions about which data can support the CRM process, taking in to account various internal and external sources and the levels of data quality and availability. Furthermore, there is an adequate IT architecture for data management in place, including a data access management. There is a taxonomy available for all databases. Every responsible in the process of data management is identified and has the necessary skills. Finally, all needed data from the most critical applications are extracted and made available as scheduled.	Consciousness and understanding of the importance and the way to manage data are reaching high levels among management/ leadership and all employees involved. This is reflected by the fact that there are documented policies and standards in place, setting the framework for how to manage data, included how to ensure their consistency, quality and availability. Furthermore, these policies and standards are based on a documented analysis, comparing several options for how to manage data efficiently in order to obtain data with good quality and supporting the CRM process. Finally, all data management activities are regularly monitored and reviewed.	The way to manage data is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the business is constantly examining the need for data required to perform an effective CRM process, taking into account an evolving external and internal context. Finally, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements regarding activities to manage data.

Help questions:

- Can you describe the current activities to manage data?
- Can you describe the underlying analysis behind data management?
- Can you describe the current IT architecture for data management?
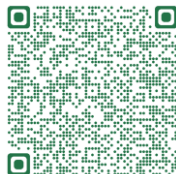
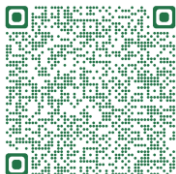# EU AI Act Compliance Risk Management Capability Maturity Model

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Evaluation – Evaluating the outcome of actions to stimulate compliance

The capability to perform relevant evaluations of the outcome of actions by using a valid process of outcome measurement, including valid methods, in order to learn and understand in how to make better choices in future to effectively stimulate compliance.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to evaluate the outcome of actions.	Awareness starts to spread among management/ leadership, although with limited understanding about the way to evaluate the outcome of actions.	Awareness and understanding of the importance and the way to evaluate the outcome of actions are clear among management/leadership but still incomplete among the employees involved.	Consciousness and understanding of the importance and the way to evaluate the outcome of actions are reaching high levels among management/leadership and all employees involved.	The way to evaluate the outcome of actions is constantly improved by learning from past experience and by involving external experts and sources.
This is reflected by the fact that attempts to evaluate the outcome of actions are made only ad hoc or not at all.	This is reflected by the fact that there are regular efforts to evaluate the outcome of actions, but the expectation that these efforts will produce valid and reliable information in order to improve compliance in the future relies on intuitive thoughts only.	This is reflected by the fact that management/ leadership masters the most important concepts of outcome measurement.	This is reflected by the fact that there is an evaluation process in place and that the selection of actions to evaluate is based on a documented analysis, comparing several options and the possibilities to produce valid and reliable information. These analyses ensure that the evaluations are relevant to the learning and understanding of how to improve compliance in the future, and that the available resources and estimated costs of performing the evaluations are taken into account.	This is reflected by the fact that the business is measuring the outcomes of the actions, thus to learn and understand how to continually improve compliance considering an ever changing external and internal context.
If there are some attempts, there are no signs that these evaluations are used to learn and understand how to improve compliance in the future.	Furthermore, the selection of the actions to evaluate is based on intuitive thoughts only.	.	Furthermore, the employees involved can apply the methodologies of outcome measurement and are able to design adequate evaluations (methodology, sample size, data collection, data analysis, etc.) producing valid and reliable information and to learn and understand how to improve compliance in the future.	Finally, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements regarding the selection of actions to evaluate, evaluation processes and on the methodology to perform outcome measurement.

Help questions:

- Can you describe the current activities to evaluate the outcome of actions? What improvements in compliance are expected to result from those activities in the future?
- Can you describe the underlying analysis behind the evaluation of the outcome of actions?
- Can you describe how the business monitors, reviews and improves the activities of evaluating the outcome of actions?

EU AI Act Compliance Risk Management Capability Maturity Model

Evaluation – Evaluating the CRM process

The capability to perform relevant evaluations of the CRM process by using a valid process, including valid methods, in order to learn and understand how to improve the CRM process.

Level 1	Level 2	Level 3	Level 4	Level 5
There is little or no awareness among management/leadership about the importance and the way to evaluate the CRM process. This is reflected by the fact that attempts to evaluate the CRM process are made only ad hoc or not at all. If there are some attempts, there are no signs that the result of the evaluations is used to improve the CRM process.	Awareness starts to spread, although with limited understanding about the way to evaluate the CRM process. This is reflected by the fact that there are regular efforts to evaluate parts of the CRM process but the expectation that these efforts will produce valid and reliable information to improve the CRM process relies on intuitive thoughts only. Furthermore, the selection of the parts of the CRM process to evaluate is based on intuitive thoughts only.	Awareness and understanding of the importance and the way to evaluate the CRM process are clear among management/leadership but still incomplete among the employees involved. This is reflected by the fact that management/leadership masters the concepts of effectiveness and efficiency and knows how to incorporate this into the evaluations. Furthermore, the selection of the parts of the CRM process to evaluate and the methods to use for these evaluations are the result of discussions, taking in to account the methodologies for conducting evaluations, in order to produce valid and reliable information in order to improve the CRM process.	Consciousness and understanding of the importance and the way to evaluate the CRM process are reaching high levels among management/leadership and all employees involved. This is reflected by the fact that there is an evaluation process in place and that the selection of the parts to evaluate is based on a documented analysis, comparing several options and the possibilities to produce valid and reliable information. These analyses ensure that the evaluations are relevant to the learning and understanding of how to improve the CRM process in the future, and that the available resources and estimated costs of performing the evaluations are taken into account. Furthermore, the employees involved can apply evaluation methodologies and are able to design adequate evaluations (methodology, sample size, data collection, data analysis, etc.) producing valid and reliable information to improve the CRM process. Finally, the activities for selecting parts of the CRM process to evaluate, the evaluation process and the evaluation methods are regularly monitored and reviewed.	The way to evaluate the CRM process is constantly improved by learning from past experience and by involving external experts and sources. This is reflected by the fact that the business is continuously examining the effectiveness of the ongoing CRM process by evaluating its effectiveness and efficiency, thus to learn how to optimize the CRM process in an ever changing external and internal context. Finally, all of this is supported by a proactive attitude, meaning that management/leadership and involved employees engage in proposing improvements regarding the selection of the parts to evaluate, the evaluation process and on the methodology to perform measurement.

Help questions:

- Can you describe the current activities to evaluate the CRM process?
- What have you learned from evaluations related to making decisions about how to treat risks or to make benefit of opportunities in order to effectively stimulate compliance?
- Can you describe the underlying analysis behind evaluating the CRM process?