The Promoter and The EU AI Act

A practical guide for the Promoters of AI systems to business transformation with respect to the EU AI Act
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EU AI Act is aligned with encouraging safe and trustworthy AI.

At AI & Partners, we define EU AI Act compliant AI systems as those that are safe, secure, transparent, resilient, auditable, fair, non-biased and human-focused. Businesses that are taking steps now to become EU AI Act compliant are not only setting themselves up for success, but they are also showing that their AI/ML systems work at the higher possible levels and building continued client trust that drives additional RoI of AI initiatives.

It is evident that the important of EU AI Act compliance to the business’s success will not only continue to move forward. What could be make clearer is the contrasting roles and responsibilities needed within a business to implement EU AI Act successfully. This is exactly why we have written the EU AI Act Playbooks – to become a crucial resource within any individual motivated to drive EU AI Act compliant practices within a business.
There are five Playbooks in this Series

The first Playbook, and the one that you are currently reading, provides the background information you need to understand your role in EU AI Act. It outlines how to identify your business’s EU AI Act Maturity Level (Emerging, Evolving, Engaging, Enhancing and Excelling) together with your specific role (Facilitator, Promoter, Guardian and Creator).

The remaining four Playbooks each cover a different EU AI Act role in depth, providing practical guidance on what to perform per level of business maturity.

Once you’ve read the playbooks you’ll feel invigorated to deliver change and encourage the safe, secure and trustworthy use of AI within your business. If you’re interested in deepening your understanding, please visit our Insights section or request a product demo with AI & Partners to help operationalise EU AI Act practices within your business.

“Adopting AI within the business isn’t just about technical capabilities. It also includes operational, cultural and regulatory aspects”

Michael Charles Borrelli, Co-CEO/COO, AI & Partners
The Promoter
Playbook

Introduction

Dear Promoter,

There are multiple different ways in which a person can engage with the EU AI Act – it can sometimes feel overwhelming and confusing on where to start.

Gratefully, this does not have to be the case. When it comes to the EU AI Act, there are four key roles within a business: Facilitator, Promoter, Guardian and Creator. Each role comes with its own set of responsibilities for making EU AI Act readiness successful and is an essential piece to the larger picture of satisfying the EU AI Act’s requirements. You can’t solve the EU AI Act all on your own, but if you understand what your EU AI Act role is and how you can fit into that larger picture, then you are setting yourself up for success in bringing the EU AI Act to life in your business.

You are reading this specific Playbook because you have identified your role as a Promoter. Your primary goal as a Promoter is to translate external factors, such as policies or user feedback, into internal action. What this means in terms of the EU AI Act is that your main responsibility is to influence the direction of your business’s AI adoption to align with external expectations. From your standpoint, successful EU AI Act implementation includes consistent evaluations of the external impact of EU AI Act efforts, clear KPIs and incentives aligned with EU AI Act objectives, compliance on both a business and technological level, harmonisation of EU AI Act governance and assessments, and the integration of ethical analyses into AI Assessment processes and procedures.

To help you better understand your role and responsibilities as a Promoter, this Playbook will take you on a deep dive into what you can practically do to successfully promote the EU AI Act within your business. We will cover everything from your strengths as a Creator to specific actions that you can take at each level of the business EU AI Act maturity to how to interact with your fellow EU AI Act roles.

You are ready to put in the work to achieve EU AI Act readiness. Let us bring you the clarity and direction you need to get started and begin prioritising the EU AI Act today.

Happy reading!
2 Persona Description

Understand the external pressures and expectations your business is facing when it comes to the development of AI.

You are responsible for translating external inputs into actionable information for the teams building the AI systems. Perhaps you are in a policy role and are concerned with the development of the EU AI Act, or are in a marketing role and are monitoring societal perception of your business, or maybe you are even in a customer-facing role and are hearing direct feedback from the users of AI systems. Although these are all very different positions within the business, the key commonality is that all three are focused on collecting external information that is necessary to influence the internal directives on AI. Another commonality that qualifies a Promoter is the lack of direct access to the AI systems, together with the lack of leadership directives specifically in AI.
Here are some typical positions within a business you will generally be found in:

- Head of Marketing
- Marketing Analyst
- Policy Lead
- Customer Success
- User Researcher

As a Promoter, you have an intimate understanding of the external pressures that your business must take into serious consideration during the AI development process. This means that your greatest strength is that insight that you bring from your direct access to the market. You know what your customers, governments, and society at large expect out of your business’s AI systems, and in order for your business to be truly successful, it must reach and even exceed these expectations.

Your greatest weakness as a Promoter lies in the fact that you are the furthest removed from your AI systems. You do not have direct access, so you do not understand how or what is being built on a granular level. You may have a leadership position, but your position does not have any AI directive, so you cannot set specific initiatives for AI. Because of your lack of access all around, you must depend heavily on the other EU AI Act roles to execute the information you pass on to them.
EU AI Act readiness is not an end result but a journey through which a business grows and evolves through.

Some businesses are at the start of their journey and are just beginning to explore the potential, while others are advanced in this journey and are looking to become industry leaders. Regardless of where a business is, the key thing to recognise is that business maturity for the EU AI Act is dynamic, and the further along the journey a business is, the more advanced, beneficial, and effective its AI systems become.

Now that you know that you are a Promoter in the EU AI Act, you need to determine your business’s maturity level, since your responsibilities are dependent on maturity level. Just as your business will grow and evolve through its EU AI Act journey, so will your role and responsibilities. Once you have identified the desired stage of maturity, you will be able to select the practical goals and actions you can take as a Promoter specific to the point in which your business is in its EU AI Act journey.
Along this EU AI Act journey there are five stages of maturity that a business can achieve: Emerging, Evolving, Engaging, Enhancing and Excelling. Each stage has a defining philosophy and approach to AI systems which you can distinguish by identifying the existence of key indicators, including, but not limited to, actions, tools, initiatives, and engagement within a business.

If you are unsure of your business’s maturity level, please refer to the EU AI Act Playbook as a resource to help you determine where you are in the EU AI Act journey.
Emerging

Stage 1
At the Emerging stage, a business is starting to explore the EU AI Act and is motivated to build an internal awareness of its provisions, requirements and obligations.

✓ As a Promoter, your primary goal during the Emerging stage is to complete a gap analysis of your business’s AI systems and/or practices.

When it comes to exploring the potential of the EU AI Act, the motivation to engage with the field will either come from internal drivers or, in the majority of cases, will come from external pressures on the business. These external pressures can take many forms, from the upcoming EU AI Act to brand perception to user feedback. Although these pressures are all very different from each other, they all send the same message: the EU AI Act is inherent to the business’s success in AI. It is your responsibility as a Promoter to discover what exactly these external pressures are and what they require from your business.

Conducting a gap analysis of where your business is versus where it should be in terms of the EU AI Act is specifically the responsibility of a Promoter, as you are in the perfect position to assess where your business should be in accordance with external expectations. For example, if you are in a tech policy role, then you are in the position to assess what the EU AI Act is, and how it impacts your business, and in what ways your business needs to change to meet the new requirements.
Here are a few practical examples of how you can satisfy your objective as a Promoter at this stage:

- If you are in a tech policy role, review the EU AI Act in your industry to assess what will apply to your business. Then, assess where the major gaps are between your business’s current practices and the regulatory requirements.

- If you are in a marketing role, conduct a survey on the brand perception of your business. Do people trust your technology, or are they sceptical of its intentions? Assess the results of the survey to understand where the gaps are between your current brand perception and how your business wants to be perceived.

- If you are in a customer-facing role, put together a focus group of willing customers to understand their experience in using your AI products, then assess what gaps exist between desired and actual user experience.
As a Promoter, you are looking for the following indicators of successful EU AI Act implementation at this stage:

- **Awareness**: the EU AI Act is a common topic of discussion between you and your colleagues. You frequently hear people mentioning the EU AI Act within meetings, and your team often exchanges articles and podcast episodes talking about the different EU AI Act dimensions.

When the EU AI Act is successfully implemented at this stage, you, as a Facilitator, benefit through increased cross-functional collaboration. Because you are following the EU AI Act’s developments and market trends, you are collecting valuable information for your business that is necessary for steering the direction of its AI development. As internal conversations on the EU AI Act increase, other departments will seek your insights, creating communication channels that didn’t previously exist.
Evolving

Stage 2

At the Emerging stage, a business is looking to align its policies with the required EU AI Act provisions and its motivated to establish high-level EU AI Act initiatives.

✔ During the Evolving stage, your primary goal as a Promoter is to translate the EU AI Act-related external pressures into actionable information for the teams building AI systems.

Before the EU AI Act principles can be operationalised, the appropriate and relevant principles must first be identified. As a Promoter, it is your responsibility to provide the necessary information on what EU AI Act provisions are required by law, which will build your brand reputation, and/or which are expected by your customers. Your direct access to external input on the EU AI Act is essential at this stage in helping influence which EU AI Act provisions will be selected. Once your business has identified its EU AI Act provisions and you have completed your gap analysis from the Emerging stage, you are then able to critically examine ways in which your business can start to translate these externally influenced provisions into action.

Translating EU AI Act-related external pressures into actionable information is specifically the responsibility of a Promoter because you are in a role that requires you to closely monitor these pressures in the first place. Although you play an important part in bringing provisions into practice, you are not necessarily the one in charge of designing strategies or initiatives, as you are too far removed from the AU development teams. However, this is why you must take the information you collect externally and translate it into actionable insight that the other EU AI Act roles can utilise in forming the necessary strategies and initiatives.
Here are a few practical examples of how you can satisfy your objective as a Promoter at this stage:

- If you are in a tech policy role, review the EU AI Act in your industry to assess what will apply to your business. Then, assess where the major gaps are between your business’s current practices and the regulatory requirements.

- If you are in a marketing role, design a campaign that focuses specifically on the different EU AI Act provisions your business is adopting and track how the different provisions are perceived by your audiences.

- If you are in a customer-facing role, put together a list of prioritised customer requests that align with the EU AI Act provisions for your development teams.
As a Promoter, you are looking for the following indicators of successful EU AI Act implementation at this stage:

- A clear list of EU AI Act provisions: there are many dimensions of the EU AI Act, so it is essential that a business selects and prioritises which provisions are necessary for the success of its AI. Having a clear list of EU AI Act provisions will help you as a Creator begin to identify gaps in your workflow around each of the selected provisions.

- Roadmap to compliance: at this stage, you have identified the provisions of the EU AI Act and have a clear roadmap to compliance for all of your business’s AI systems.

✓ When the EU AI Act is successfully implemented at this stage, you, as a Creator, benefit through an increase in clarity and direction. Once you know what provisions your business has targeted for alignment, you then have the clarity needed to assess if your business is externally meeting these provisions. As you identify gaps, you can better prioritise your time and effort spent researching and gathering the necessary external feedback to bring about the internal change.
Engaging

Stage 3

At the Engaging stage, a business is moving toward the EU AI Act provisions into formal practices and is motivated to test EU AI Act processes at small scale.

✓ Your primary goal as a Promoter during the Engaging stage is to monitor the effectiveness of the EU AI Act pilot programmes through external impact.

Now that your business has established what EU AI Act principles are needed to meet external pressures and expectations, it is time to act on these provisions. EU AI Act-specific processes and frameworks will be required to execute EU AI Act initiatives and will need to be assessed from both an internal and external perspective. Internally, the teams utilising the EU AI Act tools will be focused on pilot programs to test if the new EU AI Act practices work in terms of AI development. Externally, the organisation will need to understand what kind of impact the new EU AI Act practices are bringing in terms of regulatory readiness, brand perception, or user experience. It is the responsibility of the Promoter to monitor the success of the EU AI Act pilot programs from an external point of view.

Evaluating the effectiveness of the EU AI Act pilot programs in regard to the external pressures that initially helped influence the start of the EU AI Act initiatives is specifically the responsibility of a Promoter as you are the one with direct access to the necessary information. Because of your active interactions with external parties, you have the ability to monitor whether or not the EU AI Act pilot programs are helping close the gap you had originally identified in the Emerging stage.
Here are a few practical examples of how you can satisfy your objective as a Promoter at this stage:

- If you are in a tech policy role, evaluate whether or not the current EU AI Act test will be effective in bringing your business up to regulatory standards in AI.

- If you are in a marketing role, conduct a survey before and after a few months of a EU AI Act pilot program to test if the program has had any impact on the brand perception of your business.

- If you are in a customer-facing role, set up a focus group of willing customers to test the new AI products that are being impacted by the EU AI Act pilot program to understand what kind of change the client is encountering.
As a Promoter, you are looking for the following indicators of successful EU AI Act implementation:

- Initial EU AI Act assessments: in order to understand the effectiveness of your businesses efforts under the EU AI Act, it is essential that EU AI Act assessments are created to analyse the impact of your EU AI Act initiatives. Additionally, there needs to be EU AI Act-specific assessments that are conducted prior to model production in order to monitor for unnecessary risk.

- Cross-functional EU AI Act processes: siloed teams make it incredibly difficult to successfully implement EU AI Act practices. At this stage, you should begin to see cross-functional EU AI Act processes centred around specific principles, such as fairness.

✔ When the EU AI Act is successfully implemented at this stage, you, as a Promoter, benefit through perceivable shift in external pressures on your business. As your business embarks on testing EU AI Act programs, you should notice a marked change in how your business is perceived by the market and how prepared your business is in terms of AI policies under the EU AI Act.
Enhancing

Stage 4

At the Enhancing stage, a business is standardising its EU AI Act practices and is motivated to optimise the adoption of the EU AI Act.

At the stage of Enhancing, your primary goal as a Creator is to monitor the external impact of your business’s EU AI Act initiatives and advise on how to further improve.

As your business scales and standardises its EU AI Act practices, it is essential that the external impact of this change is closely monitored. The overarching goal of adopting the EU AI Act is to improve the business’s AI systems, which in turn increases the success of the AI. This success can be measured in many ways, one important factor being the external impact of the AI on either direct users, customers, or society at large. It is essential that your business has a process for assessing this external impact over time, allowing for valuable insight into the success of the EU AI Act efforts as well as into potential areas for improvement. If is your responsibility as a Promoter to establish this assessment in regard to your position, be that in EU AI Act regulatory readiness, brand reputation, or user experience.

Creating an external impact assessment and monitoring the progress of the business is specifically the responsibility of a Promoter, as you are in the position with direct access to the external aspects that need to be monitored. For example, if your role is customer-facing and your business is looking to make the user experience of its AI more inclusive, you have direct access to customers that is needed to understand if the efforts being done are resulting in an increase in accessibility or not.
Here are few practices examples of how can achieve your goal as a Promoter at this stage:

- If you are in a tech policy role, conduct an evaluation of your business’s EU AI Act regulatory readiness. Once your business is compliant with the EU AI Act, you can look towards ongoing compliance.

- If you are in a marketing role, create a report that highlights your business’s efforts in the EU AI Act. Complement this report with a survey about the perception of your business in order to understand the effects of the efforts on your brand reputation.

- If you are in a customer-facing role, ask your developer teams what EU AI Act provisions they are currently working towards optimising for. Then, conduct a focus group study with willing clients to understand if they are experiencing the desired impact or not.
As a Promoter, you are looking for the following indicators of successful EU AI Act implementation at this stage:

- **Standard EU AI Act assessments**: at this stage, you should be actively assessing for the external impact brought about by the internal EU AI Act business transformation.

- **EU AI Act metrics**: incentives and objectives are the main drivers of action for your teams. At this stage, you should have selected EU AI Act-specific metrics that have been designed to promote and encourage the adoption of EU AI Act practices.

✔️ When the EU AI Act is successfully implemented at this stage, you, as a Promoter, benefit through an increase in efficiency in evaluating external pressures and implementing necessary improvements to your business’s AI systems. The purpose of harmonising the EU AI Act tools and frameworks cross-business is to unlock the ability to assess critically, both internally and externally, your AI and EU AI Act practices to spot areas needing improvement and optimisation.
Excelling

Stage 5

At the Excelling stage, a business is proactively using the EU AI Act as a differentiator and is motivated to become an industry thought leader and framework.

As a Promoter, your primary goal at the final stage of Excelling is to proactively look for ways in which your business can use the EU AI Act as a positive differentiator.

Congratulations on reaching the final stage of maturity; it is a true accomplishment! You are now in an exciting position to be able to establish your business as an industry benchmark for the EU AI Act. One way to do this is strategically utilise the EU AI Act as a key differentiator in the market. What this means is examining the external expectations society has for AI and then evaluating what kind of EU AI Act provisions apply to meet or even exceed these standards. It is the responsibility of the Promoter to track trends, whether that be in policy, marketing, or user experience, and assess how the use of EU AI Act provisions can work with these trends.

Evaluating ways in which the EU AI Act can be used as a differentiator for the business is specifically the responsibility of a Promoter because you are naturally in a position that must pay close attention to the trends of the market. You are already tracking the progress and direction of external pressures and so are in the perfect role to be able to provide crucial insight into how the EU AI Act can be used in congruence with these external factors.
Here are a few practical examples of how you can satisfy your objective as a Promoter at this stage:

- If you are in a tech policy role, actively seek out conversations with regulators on the topic of what is and is not AI. By engaging in external education on AI, you are able to help regulators better align legislation between direction of AI and the need for the EU AI Act.

- If you are in a marketing role, run a market assessment on what the EU AI Act provisions matter the most to people. With your findings, create a test campaign to understand which of those provisions will resonate the most with your specific audience.

- If you are in a customer-facing role, evaluate which EU AI Act efforts see the greatest return on customer satisfaction for your business. With this insight, proactively engage and contribute to standards bodies looking to establish best practices for your industry.
Congratulations, you have reached the last stage! As a Creator, you are looking for the following indicators of successful EU AI Act implementation at this stage:

- EU AI Act Research & Development: once your business has reached the final level of business maturity, it is become a leader in the EU AI Act. This means you are in unique position to contribute to new innovation and development in the EU AI Act. An indication of success at this level is a specific budget of money and resources being allocated for research and development in EU AI Act.

✓ When the EU AI Act is successfully implemented at this stage, you, as a Promoter, benefit by getting the opportunity to work on the cutting edge of the EU AI Act. Now that your business is an industry leader, there is potential and motivation to remain in a leadership position within the EU AI Act, which requires continued innovation and problem-solving for EU AI Act challenges. You, as a Promoter, will have the unique opportunity to recommend new directions for innovation and risk reduction of your AI systems based on the external feedback you are collecting and to help develop solutions that could become best practices for your entire industry.
4 Relationships

EU AI Act is a multi-stakeholder endeavour.

As a Facilitator, you play a pivotal role in making EU AI Act readiness successful within your business.

Notwithstanding, you are not alone in your efforts, as the EU AI Act is a multi-stakeholder endeavour. Let’s examine how your role as a Promoter typically engages, supports, and relies on the other three EU AI Act roles.
The Promoter 
Playbook

Creator
Promoter

You can find Creators working in: Product Development and Engineering Teams.

The Creator and Promoter are similar in the sense that both roles do not have the power within the business to set initiatives or objectives. Notwithstanding, both roles are specifically adept at gathering important information necessary to guide the direction of the EU AI Act within a business. With this in mind, the Creator can turn to the Promoter for critical information on developments in policy or user feedback that will need to be incorporated into the AI systems.

Guardian
Promoter

You can find Guardians working in: Risk, Compliance & Legal Teams.

When it comes to the Promoter and Guardian relationship, this is the most significant pairing a Guardian can have. This is because the Guardian has the leadership power that the Promoter lacks and is usually in charge of setting the Promoter’s objectives. The Guardian and Promoter must work closely together, as the Guardian will be transformational in aligning the Promoter’s objectives to EU AI Act provisions, while the Promoter will be crucial in providing the Guardian with in-depth information on policy developments and user feedback.

Facilitator
Promoter

You can find Facilitators working in: Technology & Innovation Executive Teams.

Just as the Facilitator relies on the Creator for information on what is needed to execute EU AI Act initiatives, the Facilitator relies on the Promoter for information on what needs to be included in the EU AI Act initiatives. Because the Promoter has essential insight into either policy developments or user feedback, they can be a great resource of information on the external pressures the Facilitator needs to take into consideration when it comes to developing EU AI Act strategies and practices.
Conclusion

Congratulations. You now have the knowledge needed to get started on bringing the EU AI Act into your business! With this information you have set yourself up for success in helping bring the EU AI Act to your business – and being a success. By taking a deep dive into your role as a Creator and exploring what strengths you can contribute to implementing the EU AI Act, you have gained clarity into the practical actions you can take to improve and become an industry leader in the EU AI Act world.

You now have a guide for how to engage and promote business EU AI Act transformation at every maturity level within your business. Now, it’s time to go out and use it.

If you are ensure whether your business is in in terms of maturity , you can refer back to the EU AI Act Business Transformation Playbook for more information on how to identify the business maturity level. If you are unsure where or not you fit the Creator role or want to know more about the other roles, you can refer to the other three Playbooks on Facilitator, Promoter and Creator.

Remember: the EU AI Act is a multi-stakeholder opportunity for your business, so be sure to share the Playbooks with your team – and beyond.

Now that you’ve finished the Playbooks you should feel invigorated to embrace change and promote the safe, secure and trustworthy use, deployment, development, importing and distribution of AI systems within your business. If you’re eager to further your understanding, please visit the insights section of our website or request a product demo with AI & Partners to help operationalise EU AI Act practices within your business.