

Code of Practice for providers of general-purpose AI models – compliance with Art. 53 and Art.55, AI Act

The rules governing general-purpose AI (“GPAI”) in Regulation (EU) 2024/1689 on Artificial Intelligence (“AI Act”) will apply from 2 August 2025¹. To support their implementation, the AI Office (“AIO”) has been facilitating the drawing-up of a code of practice to detail out these rules. The final version of the *General-Purpose AI Code of Practice* (“Code”) was published yesterday, on 10 July 2025².

Overview of the Code

The Code is made in accordance with Article 56 of the AI Act. The published version contains three chapters:

No	Chapter	File accompanied	Legal text in AI Act	Applicable to
1.	Transparency	Model Documentation Form	Art. 53(1)(a), 53(1)(b), 53(2), 53(7) Annex XI (sect. 1) ³ Annex XII	All providers of GPAI models Except for: Providers of AI models that are released under a free and open-source license and are free from systemic risks , as set forth in Art. 53(2) ⁴
2.	Copyright	N/A	Art. 53(1)(c)	
3.	Safety and Security	N/A	Art. 55(1) Art. 53(1) Art. 56(5) Annex XI (sect. 2) Recital 110 Recital 114 Recital 115	Providers of GPAI models with systemic risk

¹ In the coming weeks, the AIO and AI Board will assess the Code and may approve it via an Adequacy decision ahead of the rules’ entry into application.

² European Commission, *The General-Purpose AI Code of Practice*, 10 July 2025: <https://digital-strategy.ec.europa.eu/en/policies/contents-code-gpai>

³ Recitals, last paragraph, Transparency Chapter of the *General-Purpose AI Code of Practice*: “The documentation obligations concerning Annex XI, Section 2 (...) are covered by Measure 10.1 of the Safety and Security Chapter of this Code.”

⁴ [Article 53\(2\) of the AI Act](#)

Application and legal effects of the Code

The Code is intended as a **voluntary** tool to assist providers of GPAI models to demonstrate their compliance with the obligations laid down in Articles 53 and 55 of the AI Act. That is, providers can demonstrate compliance with the said obligations by other means. Also, it was repeated in each chapter that adherence to the Code **does not** constitute conclusive evidence of compliance with these obligations under the AI Act⁵. Nevertheless, in light of the additional legal effects outlined in Article 101(1) of the AI Act⁶, following the Code may facilitate the demonstration of compliance and offer procedural advantages.

By signing the Code, providers of GPAI models commit to documenting and reporting additional information, as well as engaging the AIO and relevant third parties throughout the entire model lifecycle, insofar as this is considered necessary for providers to effectively comply with their obligations under the AI Act⁷.

Transparency Chapter

This chapter focuses on the documentation obligations from Article 53(1)(a) and (b) of the AI Act, offering a three-page Model Documentation Form ("**Model Documentation**"). This form specifies the required information to document and clearly indicates whether each item of information is intended for the AIO, national competent authorities or downstream providers⁸ (namely, providers of AI systems who intend to integrate the GPAI model into their AI systems).

In addition to recalling the provisions in the AI Act, this chapter introduces some interesting timelines:

- 1) **When placing a GPAI model on the market**, providers will:
 - (i) have documented all the information referred to in the Model Documentation, and
 - (ii) publicly disclose, either on their website or, if no website exists, by other suitable means, contact information enabling the AIO or downstream providers to request necessary information.
- 2) In the event of update of the Model Documentation, the previous version must be kept for a period ending **10 years** after the model has been placed on the market.
- 3) Providers of GPAI models will provide the information requested by downstream providers under the AI Act within **14 days** of receiving the request except in exceptional circumstances.

Copyright Chapter

The commitments outlined in this chapter aim to support providers of GPAI models in demonstrating compliance with Article 53(1)(c) of the AI Act. Adhering to this Code, however, **does not** constitute automatic compliance with European Union Law on copyright and related rights. Providers remain responsible for

⁵ Objectives, paragraph 2, A of the *General-Purpose AI Code of Practice*: "(...) recognizing that adherence to the Code does not constitute conclusive evidence of compliance with these obligations under the AI Act."

⁶ [Article 101\(1\) of the AI Act](#): "(...) The Commission shall also into account commitments made in accordance with Article 93(3) or made in **relevant codes of practice** in accordance with Article 56."

⁷ [Article 56\(5\) of the AI Act](#).

⁸ [Article 3\(68\) of the AI Act](#): "'downstream provider' means a provider of an AI system, including a general-purpose AI system, which integrates an AI model, regardless of whether the AI model is provided by themselves and vertically integrated or provided by another entity based on contractual relations."

ensuring that the measures included in their copyright policy fully comply with all applicable legal requirements.

The commitments of this chapter are structured as follows:

- 1) **Copyright policy:**
 - Clearly outline the copyright policy in a **single document**
 - Incorporate the measures set out in this chapter into the copyright policy
- 2) **Web-crawling measures for text and data mining:**
 - **Avoid** circumventing effective technological measures designed to protect copyright
 - Exclude from web-crawling **websites sharing public content** and **websites persistently and repeatedly infringing copyright** as identified on an official EU website
 - Employ web-crawlers configured to follow instructions set by the **Robot Exclusion Protocol** (robot.txt) or other appropriate machine-readable protocols to identify and comply with rights reservations
 - Provide affected rightholders with clear **information about the web-crawlers employed**, their robot.txt features and other measures taken to respect expressed rights reservations
- 3) **Mitigation of copyright infringing outputs:**
 - Implement effective **technical safeguards** designed to prevent outputs from reproducing copyright-protected training content
 - Explicitly prohibit copyright-infringing uses of GPAI model **within usage documentation** (e.g., use policy, terms and conditions)
 - Clearly alert users about the prohibition of copyright infringing practice within the accompanying documentation even for GPAI models **released under free and open-source licenses, without compromising the nature of such licenses**
- 4) **Facilitation of copyright complaints:**
 - Establish a designated electronic **point of contact** for copyright-related communication
 - Provide an accessible **mechanism** enable stakeholders to **electronically** submit complaints regarding non-compliance with the commitments outlined herein, ensuring diligent, non-arbitrary and timely responses
 - Offer **easily accessible information** regarding the point of contact and the complaint mechanism

Additionally, all commitments in this chapter should be appropriately scaled to the size and capacity of providers, with careful consideration given to the needs and interests of small and medium-sized enterprises (“SMEs”) including startups⁹.

Safety & Security Chapter

This 40-page chapter is the most extensive of the three and applies **exclusively to providers GPAI models with systemic risk**¹⁰. Its primary objective is to guide the management of such risks throughout the entire AI model lifecycle. The chapter outlines concrete state-of-the-art practices for managing systemic risks, i.e., risks from the most advanced models. It is accompanied by a five-page glossary defining key terms and appendices detailing technical standards, evaluation methods and risk categories.

⁹ Recitals(d), Copyright Chapter of the *General-Purpose AI Code of Practice*.

¹⁰ [Art. 3\(65\) of the AI Act](#): “‘systemic risk’ means a risk that is specific to the high-impact capabilities of general-purpose AI models, having a significant impact on the Union market due to their reach, or due to actual or reasonably foreseeable negative effects on public health, safety, public security, fundamental rights, or the society as a whole, that can be propagated at scale across the value chain”.

This chapter sets out ten core commitments, each representing a major operational requirement. These are supported by specific measures that outline how each commitment should be implemented:

1. **Safety and Security Framework:** develop, implement, and update a risk management framework.
2. **Systemic Risk Identification:** identify all relevant systemic risks using structured processes.
3. **Systemic Risk Analysis:** analyze risks using data, evaluations and modelling.
4. **Risk Acceptance Determination:** define criteria for determining when risks are acceptable.
5. **Safety Mitigations:** apply interventions to reduce risks (e.g., output filtering, access control).
6. **Security Mitigations:** protect against unauthorized access and model theft.
7. **Model Reporting:** create and maintain detailed reports for regulatory review.
8. **Responsibility Allocation:** define internal roles and responsibilities for risk governance.
9. **Serious Incident Reporting:** establish reporting mechanisms for AI-related incidents.
10. **Transparency and Documentation:** maintain and, where appropriate, publish essential information.

The chapter also acknowledges the resource constraints of SMEs and small mid-cap companies (“**SMCs**”), including startups. Accordingly, it allows for proportionate compliance measures, such as exemption from certain reporting obligations under Article 56(5) of the AI Act¹¹.

The Code serves as a practical set of guidelines for providers of GPAI models navigating the AI regulatory landscape. While it provides valuable direction, the Code is not a guarantee of compliance with the AI Act and certain areas may still remain unclear in practice. Nevertheless, voluntary adherence offers providers a structured and credible pathway to align with the AI Act.

Auteurs



Charles Bouffier

Avocat associé

cbouffier@racine.eu

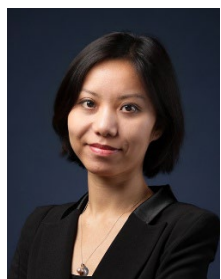
(+33) 6 64 10 87 36



Naomi Meynlé-Hamza

Juriste

nmeynle-hamza@racine.eu



Yibing Zhou

Avocate chinoise

yzhou@racine.eu

¹¹ Recitals(h), Safety and Security Chapter of the *General-Purpose AI Code of Practice*.