

## Obligations for Authorized Representatives of General-Purpose AI models

For a refresher on the notions of "Authorised Representative" and "General-Purpose AI model" (GPAI model), please consult our previous EU AI Act Decoded issues on "[Who will the EU AI Act apply to?](#)" and "[Classification of AI systems and GPAI Models](#)"

**Ensure that the appointment as Authorized Representative is made through a written mandate from the Provider**

(Art. 54)

- The written mandate must enable the Authorized Representative to perform all of the tasks assigned to it by the EU AI Act (detailed below).
- The written mandate must empower the Authorized Representative to be addressed, in addition to / instead of the Provider, by the AI Office or competent authorities on all issues related to compliance with the EU AI Act, and to provide them with all required information and documentation (incl. logs when relevant).

**Provide a copy of the written mandate to the AI Office upon request**

(Art. 54)

This must be provided in one of the official languages of the EU institutions.

**Verify Provider's compliance with the EU AI Act**

(Art. 54)

- The Authorized Representative must verify that the Provider has:
  - drawn up the technical documentation specified in Annex XI;
  - complied with all of its other obligations.

**Keep relevant documentation for 10 years after the placing on the EU market / putting into service of the GPAI model**

(Art. 54)

- The Authorized Representative must keep at the disposal of the AI Office and national competent authorities:
  - the Provider's contact details; and
  - a copy of the technical documentation.

**Terminate mandate if Provider is infringing the EU AI Act**

(Art. 54)

- ⚠ The Authorized Representative must terminate the mandate if it has reason to consider that the Provider is acting contrary to its obligations pursuant to the EU AI Act.
- ⚠ In such a case, the Authorized Representative must immediately inform the AI Office about the termination of the mandate and the reasons therefor.

### Notes:

- Authorized Representatives bear an **obligation of cooperation** with the AI office and competent authorities, which notably entails the obligation to provide all the information and documentation necessary to demonstrate compliance.



### Much more to explore!

Follow our EU AI Act Decoded Series as we delve into the intricacies of the EU AI Act.



[in linkedin.com/showcase/ai-data-digital](https://www.linkedin.com/showcase/ai-data-digital)

### Contact us



**Anne-Gabrielle Haie**  
Partner in Steptoe's AI,  
Data & Digital practice

