



AI ACT VENDOR SCORECARD · 2026 EDITION

EU AI Act Vendor Procurement Scorecard.

14 questions to score any productivity intelligence or workplace-monitoring vendor against AI Act high-risk-system criteria — before signing, before renewing, before August 2, 2026.

FOR

[Vendor under evaluation]

EVALUATOR

[CISO / Procurement / Counsel]

EDITION

v1.0 · May 2026

Disclaimer. This scorecard is a procurement aid, not legal or compliance advice. The EU AI Act (Regulation 2024/1689) high-risk-system obligations relevant to workplace AI begin to apply from August 2, 2026; staged enforcement, penalty figures, and implementing regulation details are subject to revision. Verify your specific deployer obligations, works-council requirements, and Article 5 / Article 6 classification with named counsel familiar with your jurisdiction. gStride is not certified or approved by the EU; "AI Act-ready by design" describes architecture choices, not regulatory endorsement. Penalty exposure figures range up to 7% of global annual turnover for prohibited practices and up to 3% for high-risk obligation breaches in current draft enforcement guidance — verify with counsel before quoting.

How to use this scorecard

This is a **14-question scorecard** designed to give a procurement team, CISO, or in-house counsel a reproducible read on any productivity intelligence or workplace-monitoring vendor against the categories the EU AI Act treats as high-risk. It is built to be filled in by the buyer during a vendor demo or written diligence cycle — the rubric, scoring, and verdict bands are all printed on the page itself.

The 14 questions sit inside four blocks:

BLOCK A · 4 QUESTIONS

Transparency & Documentation. AI inventory, tier classification, technical documentation, written readiness statement.

BLOCK B · 4 QUESTIONS

Human Oversight & Decision Logic. Recommendation framing, documented workflow, friction-free dismissal, no auto-feed to HR.

BLOCK C · 4 QUESTIONS

Risk Management & Data Handling. Risk-management system, logging, post-market monitoring, deployer kit completeness.

BLOCK D · 2 QUESTIONS

Surveillance Footprint & Prohibited Categories. Article 5 emotion exclusion, configurable opt-in capture with linked notice.

How scoring works. Each question is scored 0 (fail), 1 (partial), 3 (mostly), or 5 (full). Sum across the 14 questions for a total out of 70. The verdict band table on the scorecard summary page translates the total into an action: AI-Act-ready (60-70), Gaps to close (40-59), or High-risk — switch needed (< 40). Block D failures are weighted independently — any Q13 or Q14 score of 0 halts procurement regardless of total.

How the gStride reference column works. Each question carries a column showing gStride's posture on that criterion. The column is for reference only — it is not the answer for the vendor you are scoring. The intent is to give the buyer a worked example of what a 5-of-5 answer reads like in writing. gStride's posture is described as designed-with-AI-Act-categories-in-mind, deployer-friendly, with human oversight by design and no emotion inference; no certification is claimed or implied.

Recommended workflow. One pass per vendor; second pass with named counsel for Block D; verdict band reviewed before the contract conversation. Re-validate quarterly through 2026 as implementing regulations land.

BLOCK A

Transparency & Documentation

Each Q scored 0/1/3/5 — max 20

Q01 Does the vendor list every AI inference the product produces — scoring, classification, ranking, idle inference, allocation, anomaly detection — in written form?

Why it matters. Article 13 transparency starts with an AI inventory the deployer can hand to a works council. Vague is non-compliant.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Yes — public AI inventory listing focus signal, idle classification, capacity drift, billing variance, meeting overhead.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q02 Will the vendor classify each inference in writing as prohibited (Article 5), high-risk (Annex III), limited-risk transparency, or minimal?

Why it matters. Deployer needs the classification letter on file for the conformity assessment dossier. Verbal positioning will not survive an audit.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Each inference mapped in writing to category; tier letter shipped in deployer kit.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q03 Does the vendor ship technical documentation of training data sources, inference behaviour, and known limitations (Annex IV-equivalent)?

Why it matters. Article 11 + Annex IV technical documentation is a hard floor for high-risk systems on the market by August 2026.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Technical documentation work in progress against August 2026; outline available pre-contract on request.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q04 Is there a written, dated AI Act readiness statement naming conformity-assessment route + EU database registration plan (or date)?

Why it matters. A static marketing line is not a readiness statement. Counsel will ask for the dated artefact.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Public readiness statement kept current; conformity-assessment route + registration plan disclosed in deployer kit.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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BLOCK B

Human Oversight & Decision Logic

Each Q scored 0/1/3/5 — max 20

Q05 Are AI outputs framed as recommendations to a named human reviewer with full override authority, never as autonomous decisions?

Why it matters. Article 14 oversight fails if the AI score auto-feeds into HR review, ranking, or termination without a meaningful human review step.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Recommendation-to-human framing across every inference. Override is the default state, not the exception.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q06 Is there a documented human-oversight workflow — named reviewer role, review cadence, training requirement, audit trail?

Why it matters. Article 14 is met by the workflow, not by a checkbox. A written workflow with named roles is the artefact regulators ask for.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Deployer kit ships workflow defaults — named reviewer, override authority, review cadence, training note, audit trail.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q07 Can the reviewer dismiss any AI recommendation without consequence (no audit flag, no manager notification, no metric impact)?

Why it matters. Dismissal must be friction-free; oversight that punishes the override is oversight in name only.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Dismiss-without-consequence built in. No silent telemetry on dismissals back to manager dashboards.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q08 Does the platform refuse to auto-feed AI outputs into performance-improvement plans, promotions, or terminations?

Why it matters. *Auto-feed into employment decisions is the failure mode Annex III is written against.*

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	No auto-feed path exists in the product. Manager exports require explicit reviewer sign-off.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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BLOCK C

Risk Management & Data Handling

Each Q scored 0/1/3/5 — max 20

Q09 Is there a documented risk-management system covering known failure modes, mitigation, residual risk, and review cadence?

Why it matters. Article 9 risk-management is a continuous obligation, not a one-time document. Deployer can be asked to evidence the vendor side.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Risk-management documentation in progress against August 2026; failure-mode register shared under NDA pre-contract.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q10 Does the system log AI decisions with sufficient granularity to investigate incidents, detect drift, and reconstruct a sequence later?

Why it matters. Article 12 logging is the basis of post-market monitoring and post-incident investigation.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Per-inference logging with retention windows defined in the deployer kit. Sufficient granularity for incident reconstruction.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q11 Is there a post-market monitoring plan with named drift triggers, escalation path, and customer notification SLA?

Why it matters. Article 72 post-market monitoring is a provider obligation; a deployer who cannot evidence the vendor side carries the exposure.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Post-market monitoring plan documented; drift triggers + customer notification SLA in the deployer kit.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q12 Does the deployer kit include transparency notice templates, logging policy, retention windows, and works-council briefing material?

Why it matters. Deployer obligations under Article 13 + Article 26 need vendor-supplied templates to be implementable inside 90 days.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	<p>Deployer kit ships notice template, logging policy, retention windows, and works-council briefing outline.</p>
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR _ / 5

BLOCK D

Surveillance Footprint & Prohibited Categories

Each Q scored 0/1/3/5 — max 10

Q13 Are emotion, mood, stress, engagement, and wellbeing inferences from keystroke, mouse, webcam, or microphone fully excluded — not just toggled off?

Why it matters. Article 5 prohibits emotion-recognition AI in the workplace. A toggle is not exclusion; the marketing copy that sold the feature is what regulators read.

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	Category excluded by design, not by toggle. No emotion / mood / stress / engagement inference anywhere in the product.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Q14 Are screenshot capture, keystroke logging, and continuous mouse capture configurable per-feature with default OFF and linked worker notice?

Why it matters. *Default-on capture inverts the deployer's consent posture. Per-feature opt-in with linked notice is the safer architecture.*

SCORE	RUBRIC	GSTRIDE POSTURE (REFERENCE)
0	Fail — no written artefact; vendor declines to answer or treats the question as out-of-scope.	All capture features off by default. Per-feature opt-in toggles with linked Article 13 notice template.
1	Partial — verbal commitment only; no documented workflow, template, or dated artefact.	
3	Mostly — written answer + named owner + workflow exists; some elements still in progress.	
5	Full — written artefact, named owner, dated workflow, and a templated deployer deliverable.	

YOUR SCORE FOR THIS VENDOR

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Scoring rubric — sum and verdict

Sum each block's question scores (each question is 0, 1, 3, or 5) into a total out of 70 across the 14 questions. Use the table below to translate the total into a verdict band before contracting.

TOTAL	VERDICT	NEXT STEP
60 – 70	AI-Act-ready	Architecture and operating discipline aligned with Annex III obligations. Move to contracting and deployer-kit review.
40 – 59	Gaps to close	Material gaps in documentation or human-oversight workflow. Request remediation plan + named owner + date before signing.
< 40	High-risk — switch needed	Structural exposure on prohibited or high-risk categories. Begin migration planning before August 2, 2026 enforcement.

One important note. The total is composite — a vendor scoring 50 because of Block D failures (prohibited-category exposure) is in a materially different situation than a vendor scoring 50 because of Block A documentation gaps. Always read Block D first. Any Q13 or Q14 score of 0 is grounds to halt procurement regardless of other blocks.

Want a second pair of eyes on the score?

If you have filled in a scorecard for an incumbent vendor and want an independent read before the renewal conversation — book a 30-minute readiness audit with the gStride team. We will walk through your scores, flag the documentation gaps that matter most, and share the deployer-kit templates we ship to our own customers.

[Book a 30-min readiness audit · cal.com/gstrideai/30min](https://cal.com/gstrideai/30min)

Interactive online version at gstride.ai/assets/audits/eu-ai-act-vendor-scorecard.html — auto-totals the 14 questions and surfaces the verdict band as you click.