Browne Jacobson

Step 5: Classify what roles you are likely to fall into

05 August 2024

There are several roles set out in the AI Act which are synonymous with a more traditional product safety approach, the roles and regulatory responsibility of each role reflects the supply chain.

1. Providers

'Provider' means a natural or legal person, public authority, agency, or other body that develops an AI system or a general-purpose AI model or that has an AI system, or a general- purpose AI model developed and places it on the market or puts the AI system into service under its own name or trademark, whether for payment or free of charge.

2. Deployer

'Deployer' means a natural or legal person, public authority, agency, or other body using an AI system under its authority except where the AI system is used in the course of a personal non- professional activity.

3. Importers / distributors

'Importer' means a natural or legal person located or established in the Union that places on the market an AI system that bears the name or trademark of a natural or legal person established in a third country. **'Distributor'** means a natural or legal person in the supply chain, other than the provider or the importer, that makes an AI system available on the Union market.

4. Product manufacturer

5. Authorised representatives

6. Affected persons

Additional considerations of providers...

The key role in the AI Act is the Provider which is the entity or individual who develops an AI System or a general-purpose AI model and places it on the market or puts it into service under its own name or trademark, whether for payment or free of charge. The core set of obligations on providers occur when they place high-risk AI Systems on the market. Providers are subject to obligations which cannot be satisfied by a one-time or static regulatory due diligence and compliance programme. The different categories of supply chain actors are subject to different obligations depending on whether they interact with high-risk AI, or lower risk AI. The high-risk AI Systems attract more stringent obligations in parallel with the AI Act's proportionate approach. This piece focuses on the obligations on Providers with most other classifications being leveraged off the obligations placed on Providers.

Next steps	
EU AI Act: Guide for your business	÷
Step 1: Classify whether your software is regulated	>
Step 2: Assess for exemption?	,
	→
Step 3: Assess for prohibition	÷
Step 4: Identify whether you are engaging with high-risk Al	÷
Step 5: Classify what roles you are likely to fall into	→
Step 6: Ensure established AI classification doesn't change	÷

Key contact

Jeanne Kelly

Partner

jeanne.kelly@brownejacobson.com +353 1 574 3915

Related expertise

Corporate

Criminal compliance and regulatory

Data protection and privacy

© 2025 Browne Jacobson LLP - All rights reserved