

General-Purpose AI Code of Practice: Provide your feedback to the first draft

Fields marked with * are mandatory.

Provide your feedback to the first General-Purpose AI Code of Practice!

Thank you for participating in the drawing-up of the first General-Purpose AI Code of Practice.

Upon receiving the first draft, you are encouraged to express your comments on the content via this survey, **deadline Thursday 28 November 2024, 12:00 CET.**

Your feedback is essential in helping us understand how the Code of Practice can best serve and support stakeholders across diverse sectors, leading to a final Code of Practice which should reflect the different submissions as far as possible, while ensuring a convincing implementation of the legal framework. Please be aware that the survey does not cover Art. 53(1)(d) issues.

For each section/measure/sub-measure of the Code of Practice, participants will be asked to answer **two types of questions**:

1. **Opinion rating** (close-ended feedback): express the level of agreement with the content choosing among different options.
2. **Open-ended questions**: specific to each sub-section's measures and sub-measures, and additional questions cross-measures. This includes the opportunity to comment on each section and the overall draft.

In addition, you may upload supporting documents at the end of the survey.

Each stakeholder can only submit one answer to this survey. For organisations, please note, the Point of Contact is responsible for collecting the views of their organisations chosen working group representatives.

You have the option to respond to all questions if you wish; however, you do not have to. The survey is long to enable participants to provide detailed feedback on every aspect of the Code of Practice that interests them. We trust each respondent will provide valuable input into the sections that are most relevant to their area of expertise, which may include skipping sub-measures, measures, or sections not of interest to them. For the ease of engaging with the survey, please have the Code of Practice open for reference.

Please note, **it will not be possible to forward this survey.** Your responses will be kept confidential in accordance with the Vademecum confidentiality agreements.

The AI Office is looking forward to this inclusive and transparent process!

Please provide your name, surname, email address, and the name of your organisation (if applicable).

Please note that if your contact information does not correspond to an eligible participant or to the organisation's Point of Contact, your response will be discarded.

	Name	Surname	Email address	Organisation (if applicable)
Stakeholder				

* Which stakeholder category would you (or your organisation) consider yourself in?

- Academia (in a personal capacity)
- Civil society organisation
- Downstream provider of an AI system based on general-purpose AI models, or acting on behalf of such providers
- EU Member State representative
- European or international observer
- Other independent expert (in a personal capacity)
- Other industry organisation, or acting on behalf of such organisations
- Other organisation with relevant expertise
- Other stakeholder organisation
- Provider of a general-purpose AI model, or acting on behalf of such providers
- Rightsholder organisation

* Please indicate all the working groups you participate in. Please note that if you are the Point of Contact of your organisation, you should select all the working groups of your representatives.

- Working Group 1: Transparency & copyright-related rules
- Working Group 2: Risk identification and assessment for systemic risk
- Working Group 3: Technical risk mitigation for systemic risk
- Working Group 4: Governance risk mitigation for systemic risk

* Please indicate which section you wish to provide your feedback. If you wish to comment on all sections, please select all the options.

- Overall Code of Practice Draft
- Section II: [Working Group 1] Rules for providers of general-purpose AI models
- Section III: [Working Group 2] Taxonomy of systemic risks
- Section IV: [Working Groups 2/3/4] Rules for providers of general-purpose AI models with systemic risk

Overall Code of Practice Draft

To what extent are you satisfied with the overall content of the Code of Practice?

- 1: Dissatisfied
- 2: Slightly dissatisfied
- 3: Moderately satisfied
- 4: Mostly satisfied
- 5: Highly satisfied

Would you like to share any comments on the overall Code of Practice Draft? Please note that any feedback to specific content should be given per Section.

2000 character(s) maximum

Section II: [Working Group 1] Rules for Providers of General-Purpose AI Models

Measures/Sub-measures Specific Feedback on Section II: [Working Group 1] Transparency

In this section you are asked to provide your overall opinion on the measures and sub-measures included in the second section of the Code of Practice related to *Transparency*.

Transparency, Measure 1: Documentation for the AI Office

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

2000 character(s) maximum

Please provide suggestions on how to improve this measure

2000 character(s) maximum

What KPI would you add for this measure?

2000 character(s) maximum

Transparency, Measure 2: Documentation for downstream providers

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

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Please provide suggestions on how to improve this measure

2000 character(s) maximum

What KPI would you add for this measure?

2000 character(s) maximum

For the items listed in the table (at page 10), how should the Code of Practice provide greater detail?

2000 character(s) maximum

Additional Feedback on Section II: [Working Group 1] Transparency

Please provide additional feedback on the content of the Code of Practice second section related to *Transparency* by answering the following questions.

What additional measure and/or sub-measures would you include in this sub-section?

2000 character(s) maximum

For which of the topics below is more clarification or specificity most needed? (*select all that apply*)

- General information
- Intended uses
- Acceptable use policies
- Methods of distribution
- Interaction with hardware and software
- Software versions
- Model architecture and parameters
- Input and output modalities
- License
- Technical means for downstream integration
- Training process
- Training, testing, validation data
- Computational resources
- Energy consumption
- Testing process

If you are a General-Purpose AI Model provider, which of the topics below related to the transparency obligations would be the costliest to comply with for your organization?

- General information
- Intended uses
- Acceptable use policies

- Methods of distribution
- Interaction with hardware and software
- Software versions
- Model architecture and parameters
- Input and output modalities
- License
- Technical means for downstream integration
- Training process
- Training, testing, validation data
- Computational resources
- Energy consumption
- Testing process

If you are a General-Purpose AI Model provider, for which of the topics below do you currently make information publicly available? (*select all that apply*)

- Not applicable
- General information
- Intended uses
- Acceptable use policies
- Methods of distribution
- Interaction with hardware and software
- Software versions
- Model architecture and parameters
- Input and output modalities
- License
- Technical means for downstream integration
- Training process
- Training, testing, validation data
- Computational resources
- Energy consumption
- Testing process

If you are a General-Purpose AI Model provider, for which of the topics below do you internally produce information for business purposes? (*select all that apply*)

- Not applicable
- General information
- Intended uses
- Acceptable use policies
- Methods of distribution
- Interaction with hardware and software
- Software versions
- Model architecture and parameters
- Input and output modalities
- License
- Technical means for downstream integration
- Training process
- Training, testing, validation data

- Computational resources
- Energy consumption
- Testing process

If you are a General-Purpose AI Model provider, how do you currently share information to downstream providers but not the public? (*select all that apply*)

- Not applicable
- We only share information publicly
- We provide contact information on our website
- We coordinate with our external distribution channels that distribute the model (GitHub, Hugging Face, Amazon Bedrock, Microsoft Azure, Google Vertex AI, Together)
- Other

If you are *not* a General-Purpose AI Model provider, for which of the topics below would you prefer information be encouraged to be made public? (*select all that apply*)

- Not applicable
- General information
- Intended uses
- Acceptable use policies
- Methods of distribution
- Interaction with hardware and software
- Software versions
- Model architecture and parameters
- Input and output modalities
- License
- Technical means for downstream integration
- Training process
- Training, testing, validation data
- Computational resources
- Energy consumption
- Testing process

Measures/Sub-measures Specific Feedback on Section II: [Working Group 1] Copyright-related rules

In this section you are asked to provide your overall opinion on the measures and sub-measures included in the second section of the Code of Practice related to *Copyright-related rules*.

Copyright-related rules, Measure 3: Put in place copyright policy

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

2000 character(s) maximum

Please provide suggestions on how to improve this measure

2000 character(s) maximum

What KPI would you add for this measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 3.1: Draw up and implement a copyright policy

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 3.2: Upstream copyright compliance

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 3.3: Downstream copyright compliance

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Measure 4: Compliance with the limits of the TDM exception

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

2000 character(s) maximum

Please provide suggestions on how to improve this measure

2000 character(s) maximum

What KPI would you add for this measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 4.1: Respect Robots.txt

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 4.2: No effect on findability

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 4.3: Best efforts regarding other appropriate means

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 4.4: Commitment to collaborative development of rights reservations' standards

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
-

The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 4.5: No crawling of piracy websites

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Measure 5: Transparency

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
-

The measure is close to where it needs to be

Please explain your rating to this measure

2000 character(s) maximum

Please provide suggestions on how to improve this measure

2000 character(s) maximum

What KPI would you add for this measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 5.1: Public information about rights reservation compliance

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 5.2: Crawler name and robots.txt features

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
-

The sub-measure should be lightly edited and/or further clarified

- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 5.3: Single point of contact and complaint handling

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Copyright-related rules, Sub-Measure 5.4: Documentation of data sources and authorisations

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

2000 character(s) maximum

Please provide suggestions on how to improve this sub-measure

2000 character(s) maximum

What KPI would you add for this sub-measure?

2000 character(s) maximum

Additional Feedback on Section II: [Working Group 1] Rules for providers of General-Purpose AI Models

Please provide additional feedback on the content of the Code of Practice second section related to *Copyright-related rules* by answering the following questions.

What additional measure and/or sub-measures would you include in this sub-section?

2000 character(s) maximum

Are there measures and/or sub-measures that are not technically feasible?

2000 character(s) maximum

Section III: [Working Group 2] Taxonomy of Systemic Risks

Taxonomy of systemic risks, Measure 6: Taxonomy

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Taxonomy of systemic risks, Sub-Measure 6.1: Types of systemic risks

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

What are relevant considerations or criteria to take into account when defining whether a risk is a systemic risk?

500 character(s) maximum

Based on these considerations or criteria, which risks should be prioritised for addition to the main taxonomy of systemic risks?

500 character(s) maximum

How should the taxonomy of systemic risks address AI-generated child sexual abuse material and non-consensual intimate imagery?

500 character(s) maximum

Taxonomy of systemic risks, Sub-Measure 6.2: Nature of systemic risks

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Taxonomy of systemic risks, Sub-Measure 6.3: Sources of systemic risks

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Section IV: [Working Groups 2/3/4] Rules for Providers of General-Purpose AI Models with Systemic Risk

Measures/Sub-measures Specific Feedback on Section IV: [Working Group 2] Risk assessment for providers of General-Purpose AI Models with Systemic Risk

In this section you are asked to provide your overall opinion on the measures and sub-measures included in the fourth section of the Code of Practice related to *Risk assessment for providers of General-Purpose AI Models with Systemic Risk*.

Risk assessment, Measure 8: Risk identification

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Risk assessment, Sub-Measure 8.1: Determining risks

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Measure 9: Risk analysis

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Risk assessment, Sub-Measure 9.1: Methodologies

To what extent do you agree with this sub-measure?

-

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Sub-Measure 9.2: Mapping to systemic risk indicators

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Sub-Measure 9.3: Tiers of severity

To what extent do you agree with this sub-measure?

-

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Is 'severity' the best way to articulate levels of 'gravity' or could it create confusion with the definition of risk as the combination of probability and severity?

500 character(s) maximum

What will those tiers of severity be? Is there already a nascent standard or a consensus forming?

500 character(s) maximum

Risk assessment, Sub-Measure 9.4: Forecasting risks

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Measure 10: Evidence Collection

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Risk assessment, Sub-Measure 10.1: Model-agnostic evidence

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Sub-Measure 10.2: Best-in-class evaluations

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

What factors might determine whether a certain evaluation method is an adequate fit for a specific model and risk, and whether an evaluation was thorough enough?

500 character(s) maximum

Risk assessment, Sub-Measure 10.3: Scientific rigour and other quality factor

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

How should high scientific rigor be operationalised? What is the gold standard and when should Signatories deviate from it (for example when conducting early, exploratory research)?

500 character(s) maximum

Risk assessment, Sub-Measure 10.4: Capability elicitation

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Sub-Measure 10.5: Models as part of systems

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

How could this sub-measure be facilitated for Signatories who provide General-Purpose AI Models with Systemic Risk as open-source models or to Business-to-Business customers?

500 character(s) maximum

Risk assessment, Sub-Measure 10.6: Diverse evaluations & generalisation

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Sub-Measure 10.7: Exploratory work

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Sub-Measure 10.8: Sharing tools & best practices

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

What channels, organisations and methods exist that would facilitate the sharing of evaluations, tools, and best practices, while not putting undue additional pressure on the research teams currently working at the cutting edge of AI Safety?

Is this measure especially beneficial to startups and Small Medium Enterprises (SMEs) who might not have as much capacity to develop these tools and practices from scratch, but might be able to use them?

Risk assessment, Sub-Measure 10.9: Sharing results

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Measure 11: Risk assessment lifecycle

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Risk assessment, Sub-Measure 11.1: Before training

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Sub-Measure 11.2: During training

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Sub-Measure 11.3: During deployment

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Risk assessment, Sub-Measure 11.4: Post-deployment monitoring

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

What methods exist (or could exist) that would enable providers of open-weights General-Purpose AI Models with Systemic Risk to monitor models they have released, without major side effects for the downstream users of these models?

Additional Feedback on Section IV: [Working Group 2] Risk assessment for providers of General-Purpose AI Models with Systemic Risk

Please provide additional feedback on the content of the Code of Practice fourth section related to *Risk assessment for providers of General-Purpose AI Models with Systemic Risk* by answering the following questions.

What additional measure and/or sub-measures would you include in this sub-section?

2000 character(s) maximum

How useful will measures 8-10 (risk assessment) be to the safety work of providers of General-Purpose AI Models with Systemic Risk and how could they be improved?

2000 character(s) maximum

How do you think that measures 6 and 8-11 will affect the safety work of providers of General-Purpose AI models with Systemic Risk?

2000 character(s) maximum

How do you judge measures 6 and 8-11 for providers of open source Models with Systemic Risk? Do you see specific concerns or have potential solutions, especially considering post-deployment monitoring and in the context of evaluating General-Purpose AI Models with Systemic Risk as part of AI systems?

2000 character(s) maximum

How do you judge measures 6 and 8-11 for providers of General-Purpose AI Models with Systemic Risk who might be startups or Small-Medium Enterprises (SMEs)? Do you see specific concerns or have potential solutions?

2000 character(s) maximum

Measures/Sub-measures Specific Feedback on Section IV: [Working Group 3] Technical risk mitigation for providers of General-Purpose AI Models with Systemic Risk

In this section you are asked to provide your overall opinion on the measures and sub-measures included in the fourth section of the Code of Practice related to *technical risk mitigation for providers of General-Purpose AI Models with Systemic Risk*.

Technical risk mitigation, Measure 7: Safety and Security Framework

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Technical risk mitigation, Measure 12: Mitigations

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 12.1: Safety mitigations

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 12.2: Security mitigations

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

What standards for cybersecurity and information security should be applied to General-Purpose AI Models with Systemic Risk, depending on the systemic risk indicators and tiers of severity?

500 character(s) maximum

In what ways should cybersecurity standards for General-Purpose AI Models with Systemic Risk be different from existing cyber security standards in other domains?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 12.3: Limitations

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 12.4: Process for assessing adequacy of mapping

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Measure 13: Safety and Security Reports

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Tecnical risk mitigation, Sub-Measure 13.1: Proportionality

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 13.2: Results of risk assessment

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 13.3: Results of safety mitigations assessment

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 13.4: Results of security mitigations assessment

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 13.5: Cost-benefit analysis

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 13.6: Sufficient detail on methodology

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 13.7: Review

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 13.8: Equivalency

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Measure 14: Development and deployment decisions

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 14.1: Conditions for not proceeding

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 14.2: Conditions for proceeding

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Technical risk mitigation, Sub-Measure 14.3: External input and decision-making

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Additional Feedback on Section IV: [Working Group 3] Technical risk mitigation for providers of General-Purpose AI Models with Systemic Risk

Please provide additional feedback on the content of the Code of Practice fourth section related to technical risk mitigation for providers of General-Purpose AI Models with Systemic Risk by answering the following questions.

What additional measure and/or sub-measures would you include in this sub-section?

2000 character(s) maximum

What standards for cybersecurity and information security should be applied to General-Purpose AI Models with Systemic Risk, depending on level of risk posed (as measured e.g. by capability evaluations)?

2000 character(s) maximum

What mitigation measures do you recommend for General-Purpose AI Models with Systemic Risk? In particular, what measures do you recommend 1) pre-deployment as a result of evaluations, and 2) post-deployment (e.g. filtering at runtime)?

2000 character(s) maximum

Beyond provider-side mitigations, what safety tools need to exist and/or be adopted by society? What are providers doing to support the development / implementation of such safety tools?

2000 character(s) maximum

What are good examples of safety frameworks and safety reports for models that avoid being burdensome for smaller model providers?

2000 character(s) maximum

How are best practices around mitigations being shared between providers, including smaller providers?

2000 character(s) maximum

Which safety and security mitigation measures in the current draft do you consider disproportionately burdensome to providers?

2000 character(s) maximum

Which safety and security mitigation measures in the current draft do you consider essential?

2000 character(s) maximum

Measures/Sub-measures Specific Feedback on Section IV: [Working Group 4] Governance risk mitigation for providers of General-Purpose AI Models with Systemic Risk

In this section you are asked to provide your overall opinion on the measures and sub-measures included in the fourth section of the Code of Practice related to *governance risk mitigation for providers of General-Purpose AI Models with Systemic Risk*.

Governance risk mitigation, Measure 15: Systemic risk ownership

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 15.1: Executive level

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 15.2: Board level

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Should the above sub-measure be made relative to provider size or other relevant characteristics? If so, how?

500 character(s) maximum

Should there be more, or other examples, of what might qualify as adherence to measure 15?

500 character(s) maximum

Governance risk mitigation, Measure 16: Adherence and adequacy assessment

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 16.1: Periodic SSF assessment

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Are there specific questions such an assessment should answer?

500 character(s) maximum

How should adequacy be defined in this context?

500 character(s) maximum

Governance risk mitigation, Measure 17: Independent expert systemic risk and mitigation assessments

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Under what circumstances is independent expert systemic risk assessment of a General-Purpose AI Model with Systemic Risk appropriate before deployment? What about assessment of mitigations? Under what conditions does it seem counterproductive or unnecessary?

500 character(s) maximum

Are there circumstances under which it is appropriate or advisable to involve independent experts in risk assessments iteratively, throughout the lifecycle, starting before or during training?

500 character(s) maximum

How can independent systemic risk assessments be adapted to the magnitude and nature of the relevant systemic risk, e.g. with regards to inform security, depth of access to General-Purpose AI Models with Systemic Risk components and documentation, scope of testing, time to test, expertise and transparency?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 17.1: Before deployment

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

What constitutes an appropriate third-party evaluator? How can the Code of Practice be drafted so as to take into account the current immaturity of the industry? Is there some way providers, especially Small Medium Enterprises (SMEs), can be supported by the AI Office in ensuring independent expert assessment of risks and mitigations?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 17.2: After deployment

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

When are different means of facilitating independent testing – such as research safe harbors and vulnerability reporting – appropriate?

500 character(s) maximum

Governance risk mitigation, Measure 18: Serious incident reporting

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

What does a serious incident entail? Should the Code of Practice use the definition the AI Act uses for AI systemic in Article 3(49) or is another definition more appropriate for General-Purpose AI Models with Systemic Risk?

500 character(s) maximum

Under what conditions should a General-Purpose AI Model with Systemic Risk be judged to have indirectly led to a serious incident occurring?

500 character(s) maximum

Are there suitable technical standards or best practices that can be enable automated or streamlined reporting of serious incidents to the AI Office?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 18.1: Serious incident reporting processes

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 18.2: Response readiness

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

What possible corrective measures could be taken in response to serious incidents? Should the Code of Practice specify when they may be appropriate?

What serious incident response processes are appropriate for open weight or open-source providers?

Governance risk mitigation, Measure 19: Whistleblowing protections

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 19.1: Inform

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Are there other parts of EU Directive 2019/1937 (the 'whistleblowing directive') that are important to highlight in the Code of Practice?

500 character(s) maximum

Are there parts of the whistleblowing directions that should be clarified or further specified in the Code of Practice? Are there additional whistleblowing measures that may be appropriate to enable assessment and mitigation of systemic risk?

500 character(s) maximum

Governance risk mitigation, Measure 20: Notifications

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 20.1: General-purpose AI model with systemic risk notification

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

The AI Office has the authority to update the classification criteria for determining whether a General-Purpose AI Model is presumed to have high-impact capabilities (and are therefore whether it is classified as a General-Purpose AI Model with Systemic Risk). How could it be written such that it is clear when providers should notify the AI Office of a model meeting new classification criteria?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 20.2: SSF notification

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
-

The sub-measure should be lightly edited and/or further clarified

The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

How can this access be facilitated?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 20.3: SSR notification

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

Governance risk mitigation, Sub-Measure 20.4: Substantial systemic risk notification

To what extent do you agree with this sub-measure?

- The sub-measure should be removed in its entirety
- The sub-measure should be substantially edited and/or further clarified
- The sub-measure should be lightly edited and/or further clarified
- The sub-measure is close to where it needs to be

Please explain your rating to this sub-measure

500 character(s) maximum

Please provide suggestions on how to improve this sub-measure

500 character(s) maximum

What KPI would you add for this sub-measure?

500 character(s) maximum

What constitutes a strong reason to believe systemic risk might materialise?

500 character(s) maximum

Governance risk mitigation, Measure 21: Documentation

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

What could a standardised template for such documentation look like, to reduce compliance costs, especially for smaller providers? Note in future drafts, we intend to ensure the documentation under this measure is streamlined and combined other documentation requirements such as those detailed in Annex XI, Section 1, and Annex XII.

500 character(s) maximum

Governance risk mitigation, Measure 22: Public transparency

To what extent do you agree with this measure?

- The measure should be removed in its entirety
- The measure should be substantially edited and/or further clarified
- The measure should be lightly edited and/or further clarified
- The measure is close to where it needs to be

Please explain your rating to this measure

500 character(s) maximum

Please provide suggestions on how to improve this measure

500 character(s) maximum

What KPI would you add for this measure?

500 character(s) maximum

For what types and levels of public transparency do systemic risks increase, instead of decreasing by empowering the broader ecosystem to assess and mitigate them?

500 character(s) maximum

How burdensome is this kind of public transparency, given the common practice of publishing model and system cards? Can the measure be designed to reduce such burdens?

500 character(s) maximum

Additional Feedback on Section IV: [Working Group 4] Governance risk mitigation for providers of General-Purpose AI Models with Systemic Risk

Please provide additional feedback on the content of the Code of Practice fourth section related to *governance risk mitigation for providers of General-Purpose AI Models with Systemic Risk* by answering the following questions.

What additional measure and/or sub-measures would you include in this sub-section?

2000 character(s) maximum

Do you have any other comments, concerns, or suggestions on the current draft you have not had a chance to address above? Please feel free to include those here.

2000 character(s) maximum

Additional Feedback on Section III & IV: [Working Group 2,3,4]

Please provide additional feedback on the content of the Code of Practice third and fourth sections by answering the questions below that are related to the following working groups:

- *Working Group 2: Risk identification and assessment for systemic risk;*
Working Group 3: Technical risk mitigation for systemic risk;
- *Working Group 4: Governance risk mitigation for systemic risk.*

How do you think that measures [6-22] will affect the safety work of providers of General-Purpose AI Models with Systemic Risk?

2000 character(s) maximum

How do you judge measures [6-22] for providers of open-source Models with Systemic Risk? Do you see specific concerns or have potential solutions, especially considering post-deployment monitoring and in the context of evaluating General-Purpose AI Models with Systemic Risks as part of AI systems?

2000 character(s) maximum

How do you judge measures [6-22] for providers of General-Purpose AI Models with Systemic Risks who might be Startups or Small Medium Enterprises (SMEs)? Do you see specific concerns or have potential solutions?

2000 character(s) maximum

Supporting Documents

Please provide supporting documents, excluding the listing of links to additional websites. If you provide links, please be aware that these will be disregarded. Supporting documents should have a maximum length of n. 5 pages.