

The EU AI Act: Compliance Playbook for Swiss SMEs

What applies from August 2, 2026, who is affected despite the Swiss border, and the six pillars your compliance file must cover.

The one-paragraph version: on August 2, 2026 the EU AI Act's high-risk requirements take full effect. Swiss companies are affected whenever their AI systems reach the EU market — directly or through suppliers and integration partners. High-risk systems need documented risk management, data governance, technical documentation, logging, transparency, and human oversight. Penalties reach €35 million or 7% of global revenue. Typical implementation takes 6–12 months, so the planning window is now.

The timeline that matters

Date	What takes effect	Relevance for SMEs
Feb 2, 2025	Ban on prohibited practices (social scoring, manipulation, real-time biometric ID)	Low for most — but enforcement has started
Aug 2, 2025	General-purpose AI model duties (documentation, training-data summaries)	Affects your AI providers — verify their compliance
Aug 2, 2026	High-risk system requirements — the hard deadline	Non-compliant systems cannot be placed on the EU market
Aug 2, 2027	Deadline for systems already in operation before Aug 2026	Breathing room for legacy only — not for new deployments

Why the Swiss border does not protect you

- The EU takes roughly **52% of Swiss exports** (more than CHF 170 billion annually, Swiss Federal Customs Administration 2025) — most Swiss SMEs touch the EU market through sales, suppliers, or integration partners.
- The "Brussels effect": one compliance framework is cheaper than two, so EU standards become de facto global standards.
- The Federal Council is preparing Swiss AI legislation for late 2026, expected to align closely with the EU framework — early compliance pays twice.

Is your system "high-risk"? The quick test

Two pathways lead to high-risk classification: the AI is a safety component of a regulated product, or it falls into an Annex III application area. The Annex III areas most relevant to SMEs:

- Employment & HR (CV screening, promotion decisions, performance monitoring)
- Credit scoring and creditworthiness assessment
- Education and vocational training (assessment, admission)

- Critical infrastructure operation
- Access to essential private and public services

Common misconception: "We only use AI internally" does not exempt HR or credit applications — those are high-risk by application area, not by market.

The six pillars — your compliance checklist

- Risk management system** — documented, iterative, covering the full lifecycle
- Data governance** — training and input data quality criteria, bias examination, provenance
- Technical documentation** — system description, capabilities, limitations, architecture (kept current)
- Record-keeping** — automatic logging so outcomes can be traced and audited
- Transparency** — instructions for use; deployers can interpret and use outputs correctly
- Human oversight** — designed-in mechanisms so a human can intervene, halt, or override

Your 5-step action plan

1. **Map exposure (week 1–2):** which of your AI systems, products, or components reach the EU — directly or via customers and suppliers?
2. **Classify (week 2–4):** apply the high-risk test to each system; document the reasoning even for "not high-risk" conclusions.
3. **Gap assessment (month 2):** compare each high-risk system against the six pillars; prioritize by market impact.
4. **Build the file (months 3–6):** technical documentation, risk management records, logging — this is the long pole.
5. **Operationalize oversight (ongoing):** assign ownership, train the humans in the loop, schedule periodic reviews.

This guide is the condensed edition of our published in-depth article — sources and detail: eflury.com/en/blog/eu-ai-act-swiss-smes-2026/. As of July 2026. Not legal advice.

Questions about applying this in your business?

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