



EU AI Act & Omnibus: Act Now or Wait?

Setting the Right Strategy to
Deal with Uncertainty

Nemko Digital

21st April 2026

AI Act & Digital Omnibus: topics today

1. Introduction to Nemko Digital
2. The EU AI Act quick overview
3. What is the Digital Omnibus?
4. Your strategic options
5. How Nemko Digital is helping on conformity for EU AI ACT
6. Q&A



With you today

Alicja Halbryt
AI Trust Consultant
Nemko Digital



- **Human-Centred Technology Advocate:** Guiding human-centred innovation across policy and technology to deliver responsible and impactful outcomes.
- **Public Sector & Standardisation Expertise:** Formerly at the Dutch Ministry of Economic Affairs; expert contributor to CEN/CENELEC JTC 21 on European AI standardisation.
- **Interdisciplinary Academic Background:** MA in Service Design (University of the Arts London) and MSc in Philosophy of Technology (University of Twente).
- **Focus on Ethical & Inclusive Innovation:** Committed to shaping emerging technologies that are responsible, inclusive, and grounded in real human experiences.

Bas Overtoom
Sr. AI Trust Expert
Nemko Digital



- **Experienced AI & Data Executive:** >10 years of consultancy experience, driving AI and data transformations for top global organizations.
- **Responsible AI Advocate:** Passionate about RAI to address business, social, and environmental challenges.
- **Global Business Expertise:** Strong international background i.e., 7 years in Asia, fostering cross-cultural collaboration. Leads global BD at Nemko Digital, promoting AI Trust worldwide.
- **VC Advisor for AI Scale-Ups:** Supports AI startups within a prominent Dutch VC fund to achieve global growth.



Introduction to Nemko Digital

Nemko: Compliance without Complexity

Strong heritage

- 1933** Established by the Norwegian government as *Norges Elektriske Materiellkontroll*
- 1991** Became independent self-owned private foundation
- 1992 - 2003** Established offices and laboratories around the world
- 2020** Launched Cybersecurity services
- 2024** Established *Nemko Digital* to consolidate AI Trust services

Global reach & local presence

- 28 locations on 3 continents**
- Over **850 employees** worldwide.
- Offering services in more than **150 countries**
- Serving **7,000 customers** across **80 countries**.

In June 2025, Nemko signed a strategic partnership with KSA to shape the future of AI certification and trust in Korea and beyond



Proven track record

Roster of clients and services (not exhaustive)



What is top-of-mind for our clients?

We deliver Digital Trust through end-to-end compliance and advisory support, combining technical, regulatory, and process expertise.



Regulatory Compliance

AI, data,
cyber



Technical Assurance / AI Testing



ISO Readiness
ISO 42001, ISO 27001...

AI, data,
cyber



AI Assurance Tools



Global Market Access

AI, data,
cyber



Governance Maturity

AI, data,
cyber



Nemko AI Trust Mark



Strategy and roadmaps

AI, data,
cyber



The EU AI Act quick overview

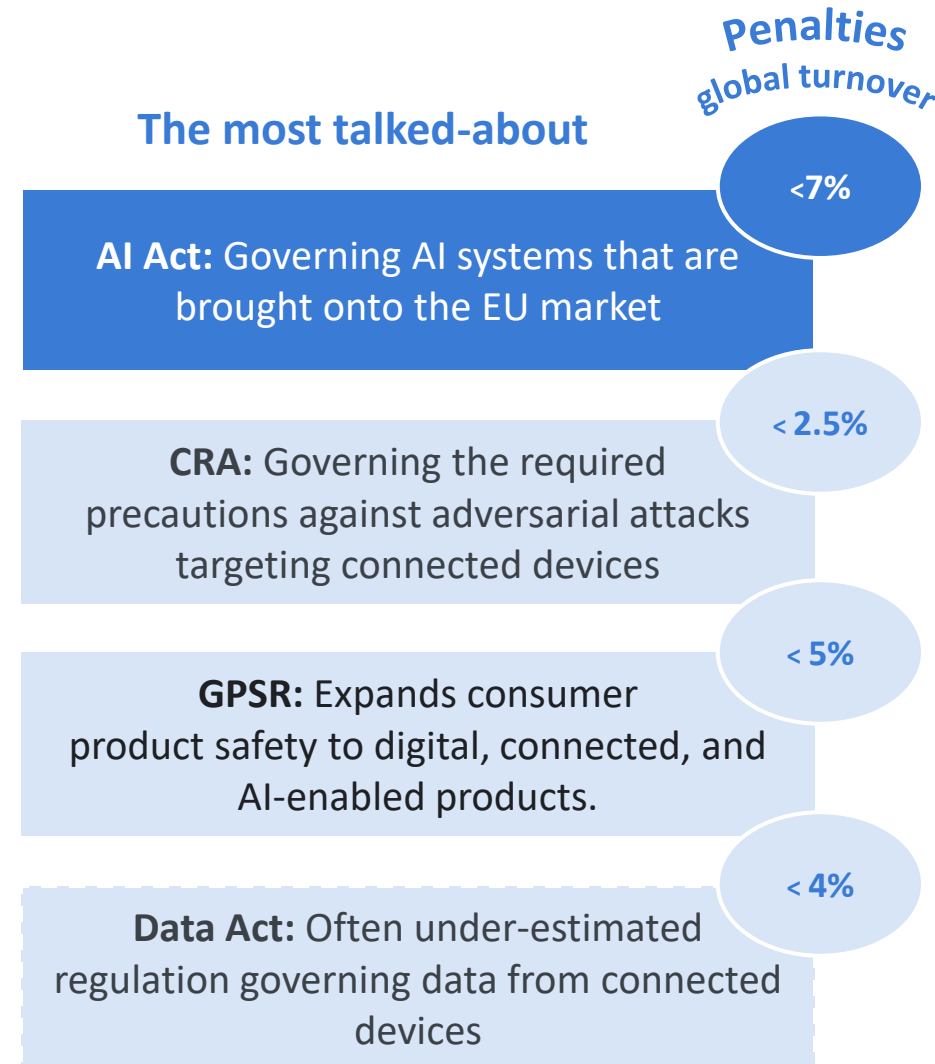
The EU AI ACT is the main regulation for AI in EU

Domain	EU Regulation	Applicability
Artificial Intelligence	AI Act	Adopted / 2026
Data protection and governance	General Data Protection Regulation (GDPR)	In force
	Data Act	In force
	Data Governance Act	In force
	ePrivacy regulation	In draft / TBC
Cyber security and digital resilience	Cyber Resilience Act (CRA)	In force
	Network Information Security Directive (NIS2)	Adopted / 2027
	Digital Operational Resilience Act (DORA)	In force
	Cybersecurity Act	In force
Product Safety and Conformity	Product Liability Directive – revised	Adopted / 2026
	Radio Equipment Directive (RED)	In force
	Machinery Regulation – revised	Adopted / 2027
	General Product Safety Regulation (GPSR)	In force
Market and Critical Infrastructure	Digital Services Act (DSA)	In force
	Digital Markets Act (DMA)	In force
Sector-specific	European Health Data Space (EHDS)	Adopted / 2026





Sources: EU regulations; Nemko Digital analysis

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The most talked-about



Understanding the EU AI Act in a page

	Provider 	Deployer 	Importer 	Distributor 	Obligations
Prohibited AI	Y	Y	Y	Y	<i>Prohibited</i>
High Risk AI	Y	Y	Y	Y	<i>Must undergo a conformity assessment</i>
Limited Risk AI	Y	Y	N	N	<i>Must adhere to transparency requirements</i>
Low Risk AI	N/A	N/A	N/A	N/A	<i>No obligations – Subject to codes of conduct</i>
GPAI	Y	N	N	N	<i>Subject to GPAI-specific requirements</i>



Key requirements for high-risk AI systems

Provider obligations



Risk management system

Data and data governance

Technical documentation

Record-keeping

Transparency and provision of information

Human oversight

Accuracy, robustness and cybersecurity

Quality management system

Accessibility

Conformity assessment

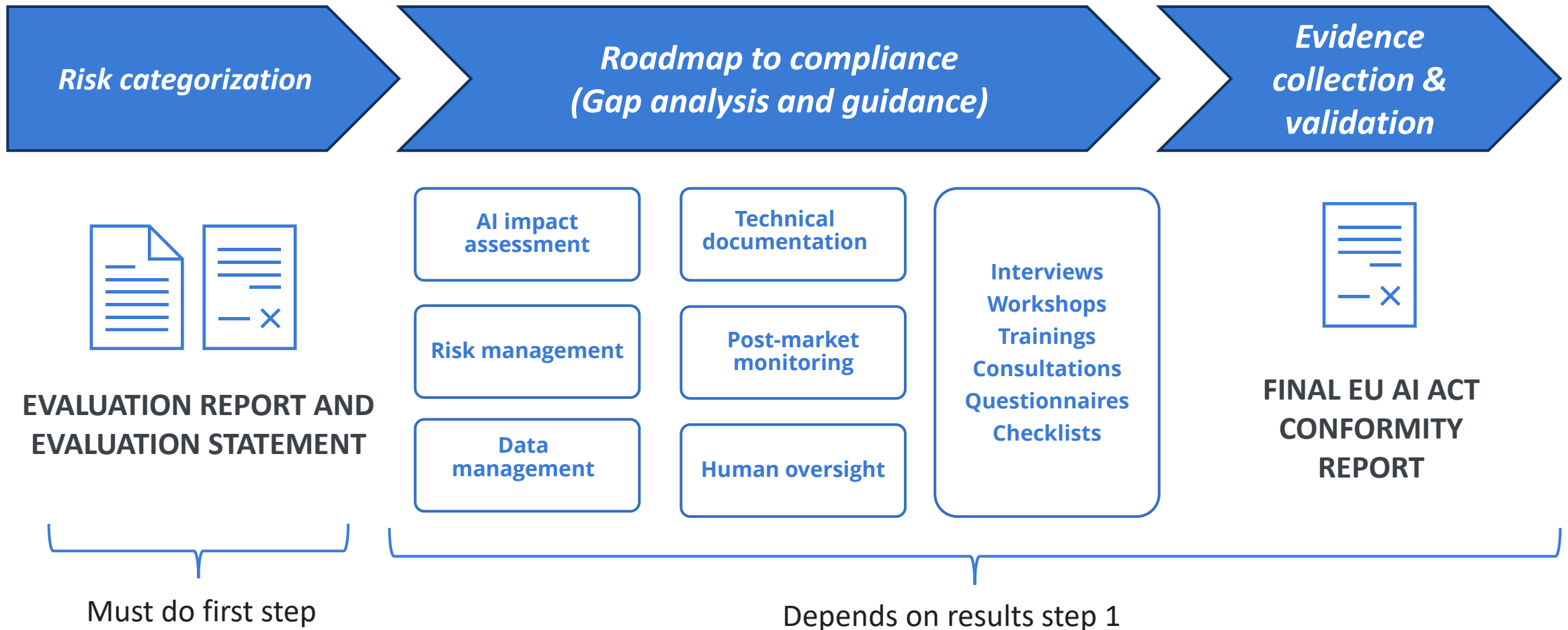
Registration in the EU database

Regulatory cooperation



A Roadmap to Compliance for EU AI Act

Our roadmap to compliance process follows three key steps: **Risk Assessment**, **Verification Process**, and **Validation**, ensuring your company is ready for certification.



What is the Digital Omnibus?

What is the Digital Omnibus?

- In EU legislation, an **omnibus** is a **package of changes** to several existing regulations or directives.
- **Purpose:** to simplify (digital) rules and clarify the regulation to ease implementation and reduce burden on businesses.

Digital Omnibus Package:

- Digital Omnibus & Digital Omnibus on AI.
- A broader simplification package for **EU digital, data and cybersecurity laws**.
- The **AI Act** is one of the main pressure points that triggered the need for adjustments.



The 'Digital Omnibus on AI' timeline



*Trilogue negotiations (Council + Parliament + Commission) to agree final amendments.



The key dates will likely change

As of the latest update of 26th March 2026

AI Act original timeline

simplified



Entry into force Prohibited practices, AI literacy GPAI obligations Most high-risk AI obligations Remaining obligations

“Watermarking” obligations for AI systems*

AI Digital Omnibus proposal








Parliament-proposed deadline Commission-proposed deadline Annex III AI systems Annex I AI systems

In pink: proposed delays to obligations due to complexity and lack of availability of harmonised standards – **not fully accepted yet**

*obligations for AI systems placed on the market before 2 August 2026



Key impact points of the Digital Omnibus on AI

Debated topic	Digital Omnibus proposal	So what?
 Use of sensitive data for AI bias checks	Possible broader access for AI training and testing	Unclear limits on data use → impacts model training and compliance effort
 Registration of high-risk AI systems in the EU database	Considered easing registration rules for some systems, but core requirement remains	Full tracking still required → compliance burden largely unchanged
 AI literacy	Shift toward more flexible/shared responsibility rather than strict company duty	Unclear how much training is mandatory vs encouraged
 Ban on explicit deepfakes	Proposed stricter bans on non-consensual and abusive AI content	Stronger risk exposure for certain AI use cases and products
 EU AI Office vs national authorities role	Debate over division of responsibilities between EU and national authorities	Unclear who will enforce rules → potential fragmentation in guidance



What should you be prepared for?

Your strategic options

Four business responses to Digital Omnibus uncertainty

1. Proactive Compliance

Avoid risk early

“Let’s comply now”

Full alignment with rules

Prevents fines/issues

2. No-Regret Moves

Reduce risk efficiently

“Let’s do what’s safe now”

Partial, low-risk actions

Reduces major risks

3. Wait-and-See

Avoid premature investment

“Let’s wait for clarity”

Minimal action

Short-term savings

4. Strategic Differentiation

Gain competitive advantage

“Let’s win with this”

Go beyond compliance

Drives trust and conversion



Let's hear from you!

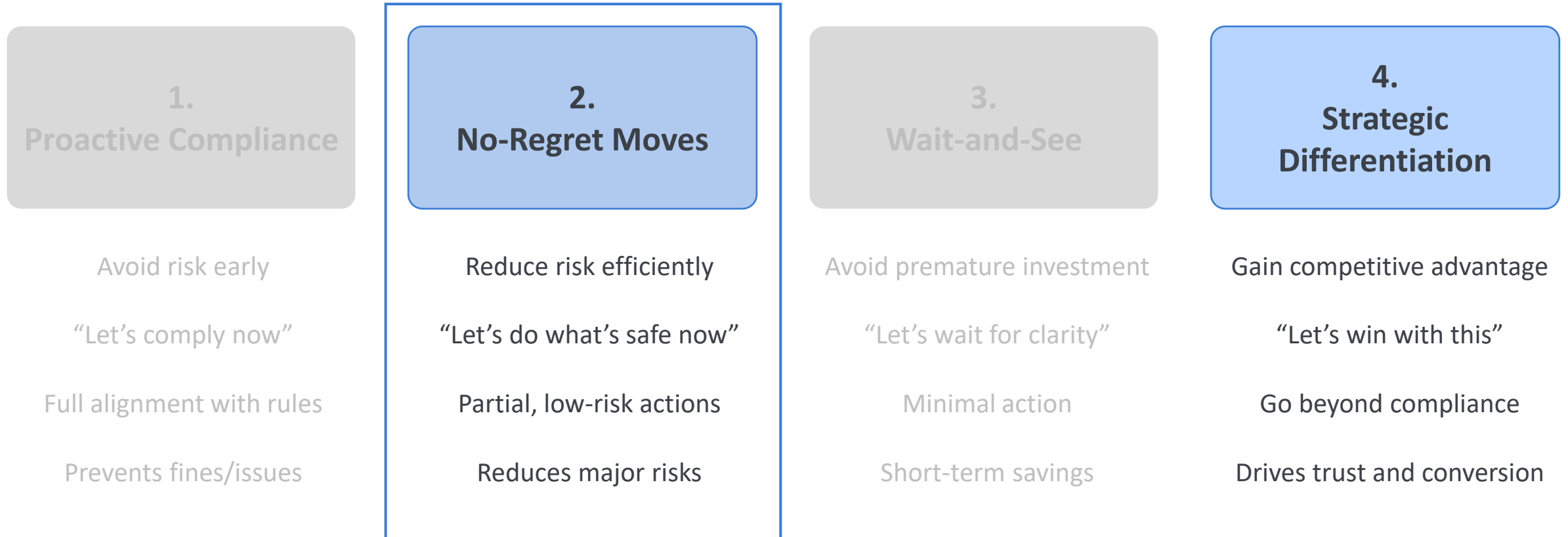
Which scenario will you choose?
What's your initial view?

- 1. Proactive compliance
- 2. No Regret-Moves
- 3. Wait and see
- 4. Strategic differentiation



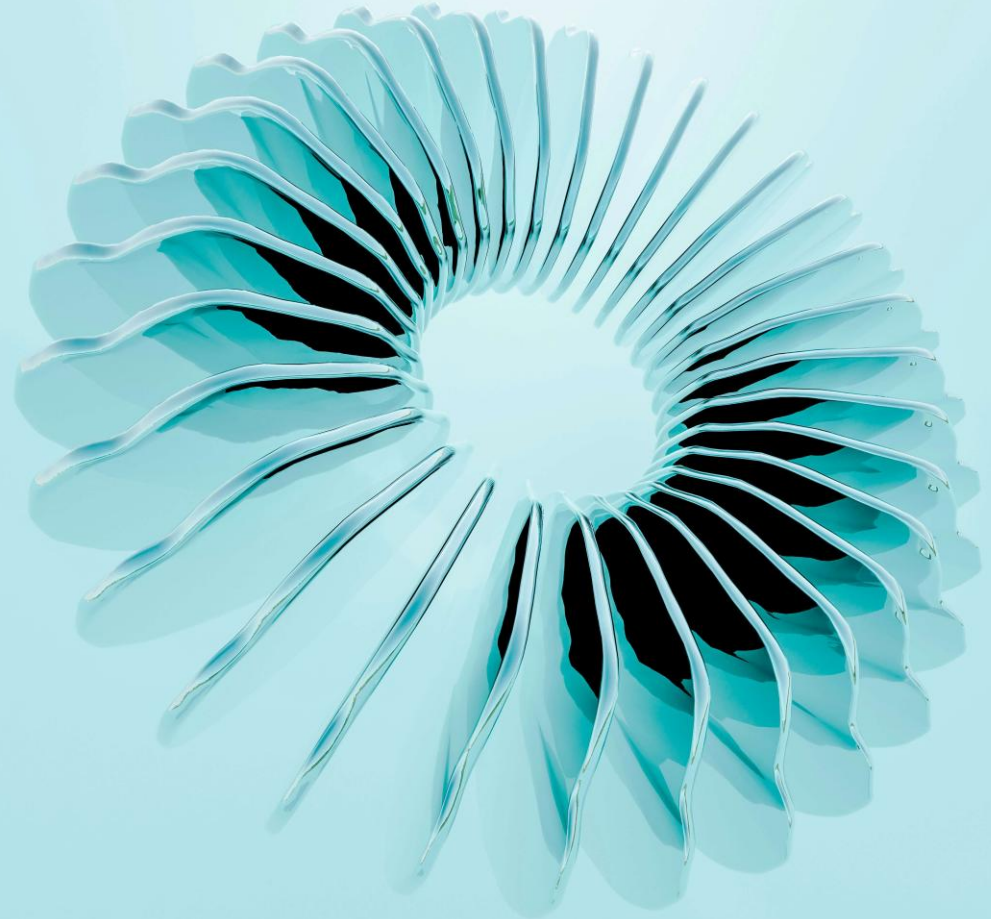
Your strategic options to go from uncertainty into action

Four business responses to Digital Omnibus uncertainty



No-regret moves that deserve focus

- **AI Inventory**
Identify and map all AI systems and their key data dependencies across internal, customer-facing, and third-party environments to establish visibility and control.
- **Risk Classification**
Categorize each AI use case by risk level in line with the EU AI Act to prioritize compliance and mitigation efforts.
- **Accountability & Oversight**
Assign clear ownership for AI systems, ensuring responsible individuals can monitor, intervene in, and are accountable for AI-driven decisions.
- **Transparency & Awareness**
Inform users and relevant stakeholders (including employees) about AI use and ensure they have the awareness and basic training to understand, use, and challenge AI appropriately.
- **Business Risk Lens**
Assess AI not only against the EU AI Act but also for broader business risks such as legal, reputational, operational, and financial impact.
- **Incident Management**
Establish processes to log, monitor, and respond to AI-related incidents, including failures and potential harms.
- **AI Procurement & Supply Chain**
Initiate governance over AI vendors and dependencies, including due diligence, contractual safeguards, and supply chain risk management.



Regulatory compliance only does not manage the full AI risk landscape

AI introduces risks that extend beyond regulatory compliance and directly impact business operations, trust, and value creation. Effective AI governance therefore requires a **holistic approach that integrates regulatory, technical, and business risk management.**

Regulatory Risk (Compliance Driven)

- EU AI Act requirements
- Data protection (GDPR)
- Transparency & explainability obligations
- Documentation and conformity assessments
- Liability and accountability

Regulation-driven



Standards-based



Business Risk (Value & Operations)

- Wrong or biased AI outputs impacting decisions
- Brand and reputation damage
- Operational failures or unreliable models
- Security vulnerabilities and model misuse
- Loss of stakeholder trust

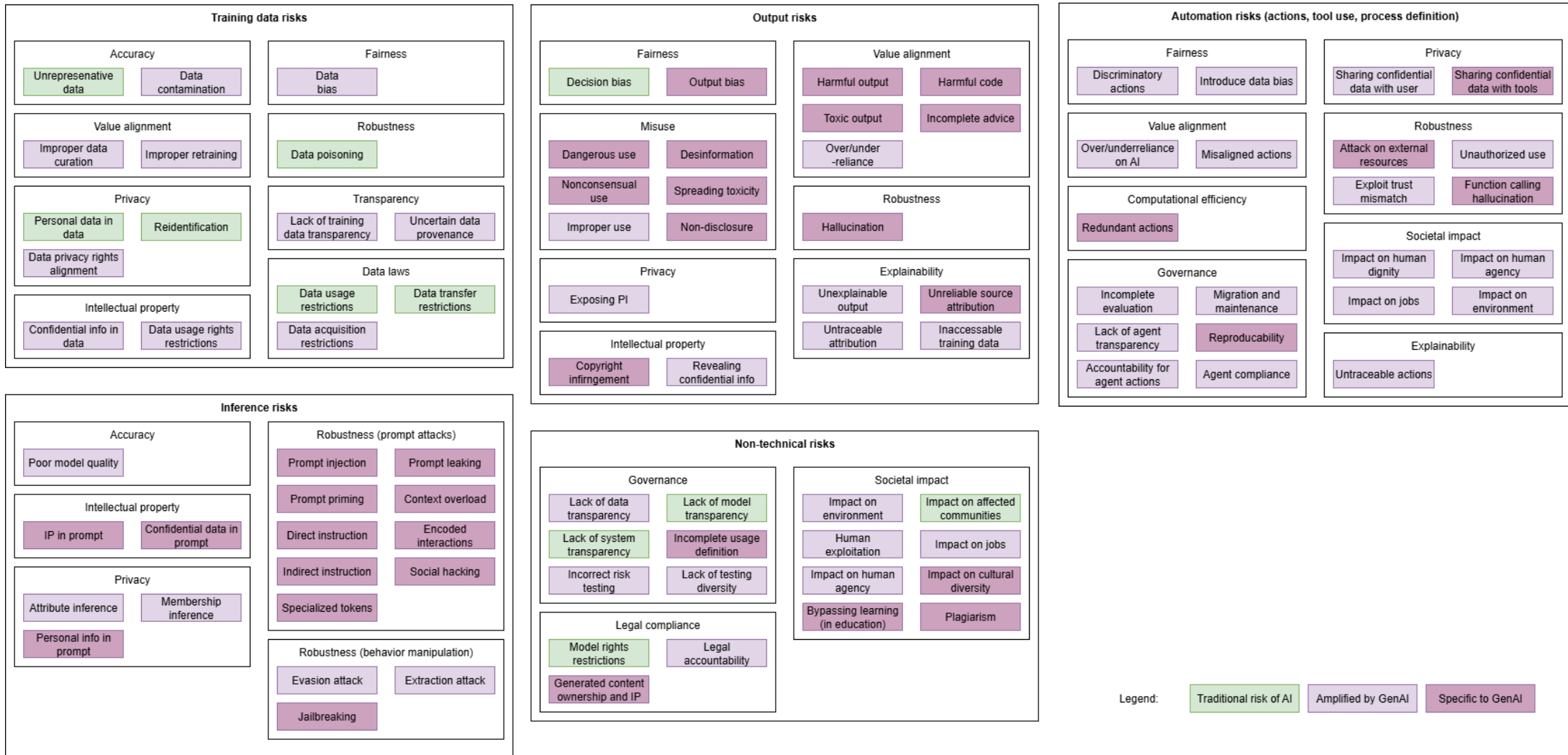
Principle-led



Business-driven



Building on IBM Risk Atlas, we built a client-specific version



Bron: IBM AI Risk Atlas



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Strategic Differentiation (AI Trust Mark)

Important business drivers to focus on AI Trust



Competitive Advantage

- Trust & credibility
- Brand reputation
- Premium pricing



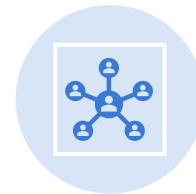
Regulatory & Compliance Alignment

- EU AI Act & global standards compliance
- Pre-emptive regulatory readiness
- Legal risk mitigation



Consumer & Business Trust

- User adoption & retention
- Enterprise & public sector procurement
- Transparency & accountability



Ecosystem Influence & Business Growth

- Industry leadership
- Stakeholder engagement
- Corporate social responsibility (CSR)
- Investor confidence



Risk & Quality Management

- AI risk mitigation
- Process maturity validation
- Incident response & liability protection



Market Expansion & Global Acceptance

- International market access
- Interoperability & standardization
- Cross-border recognition



- **Samsung Electronics** aimed to leverage AI Trust as a competitive advantage, reinforcing its position as a global leader and signaling that trustworthy AI is a top priority.
- It wanted to clearly show the market that responsible, secure AI deployment is central to its strategy.
- The Nemko AI Trust Mark provided a credible, independent solution to validate and communicate this commitment.



Bridging the gap between Compliance for Process and Product

The **AI Trust Mark** is aligned with the **EU AI Act** and built on the **ISO/IEC 42001** framework. It goes beyond governance documentation by validating how these processes are **applied to the specific AI product** and how the system functions within the real service context. The **evidence collected** also serves as the foundation for **EU AI Act self-declaration** or **Notified Body conformity assessment**, if required.

Benefits of Nemko's AI Trust Mark for market-ready AI

Effective

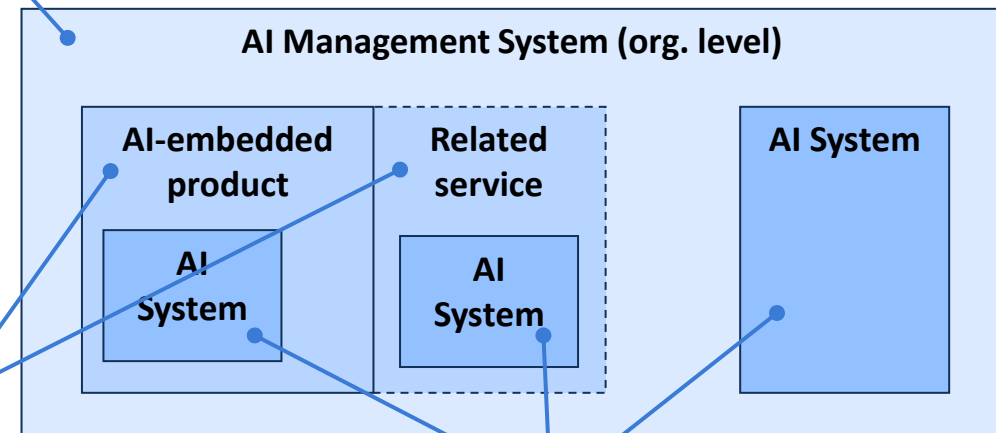
- **Product-focused** and market-entry aligned
- **Harmonized** with leading international standards and regulations
- **Clear, measurable end state** for compliance readiness.

Efficient

- Validation of relevant **ISO 42k** processes for the product going to market.
- Integrates existing guidance to smoothen **EU AI Act** conformity checks



ISO/IEC 42001: Certification of the AI Management System (organization-level)



EU AI Act: Conformity requirements on AI Systems



NIST AI RMF: Guidance on AI-specific risks, mitigations and controls (for AI systems)



How Nemko Digital is helping on conformity for EU AI ACT

Nemko's AI Trust Mark

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Call with our AI Act experts now!

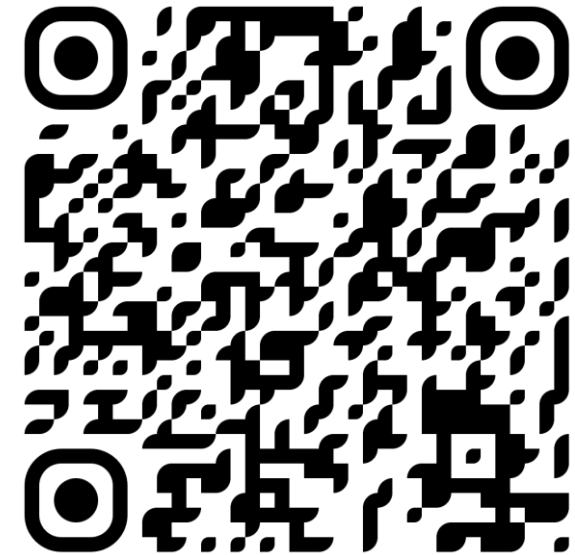
Don't wait for the next step

 Open to Webinar Participants

 Complete Application Form

 Share topic you want to talk about

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