



AAE

ACTUARIAL
ASSOCIATION
OF EUROPE

EC Guidelines on Classifying High-Risk AI Systems Summary of AAE Key Messages



Prepared by Stephanos Hadjistyllis
AAE Senior Actuary & Project Manager

What was the consultation about?

The European Commission published draft Guidelines clarifying when an AI system qualifies as “high-risk” under Article 6 of the AI Act. It covered:

- General classification principles: AI system definition, intended purpose, Article 6(3) filter.
- The Annex I product-safety pathway for AI as a safety component of regulated products.
- Annex III use cases, including life/health insurance risk assessment and pricing.

Why does it matter?

The Guidelines will decide whether life and health insurance pricing models fall within the AI Act's high-risk regime, which brings conformity assessment and human-oversight duties from December 2027. As drafted, undefined terms in Annex III could be read to capture standard actuarial techniques.

What were our key messages?

1. **Anchor Classification in Autonomy, Not Business Line:** Base classification on the AI Act's autonomy and human-oversight criteria, not on statistical complexity or line of business.
2. **Carve Out Traditional Actuarial Techniques:** Confirm that transparent methods — GLMs, GAMs, Cox models, mortality tables — fall outside the AI system definition.
3. **Recognise the Actuarial Function as Human Oversight:** Actuarial sign-off under the Solvency II Actuarial Function should satisfy the “meaningful human oversight” test.
4. **Confirm Pricing Systems Fall Outside Annex I:** Pricing, underwriting and reserving systems do not perform a product “safety component” function.
5. **Apply a Substance-, Not Form-Based Test:** Classify AI models on the substance of the risk assessed, not the product's legal form (life/health vs. non-life).
6. **Clarify the Link to GDPR Profiling:** Give practical guidance on how the Article 6(3) filter interacts with GDPR profiling in individual pricing.



AAE

ACTUARIAL
ASSOCIATION
OF EUROPE

ACTUARIAL ASSOCIATION OF EUROPE

Silversquare North
Boulevard Roi Albert II 4
1000 Brussels, Belgium
www.actuary.eu

Follow us on [LinkedIn](#)
and X: @InfoAAE



ADVISING • ACHIEVING • ENGAGING