

The GPAI Code of Practice – Key measures

What is the GPAI Code of Practice ("Code")?

- A voluntary framework prepared by experts and stakeholders and published by the EU Commission
- Outlines what measures providers of General Purpose AI ("GPAI") models can take to comply with their obligations under the AI Act
- Contains 3 chapters: Transparency, Copyright, Safety and Security

Key measures

1. Transparency

- Apply to all providers of GPAI models (Art. 53 (1) lit. a, b AI Act)
- **Document** and update **technical information on the GPAI model** in line with the [Model Documentation Form](#)
- **Provide information on GPAI model:**
 - On the public website: Contact information
 - Upon request to the regulator: Information in Model Documentation Form or additional information necessary for supervision and enforcement of the AI Act
 - To downstream providers: Information in Model Documentation Form intended for downstream providers, e.g. information on the model's input/output modalities and type or category of licence(s) under which the model can be made available to downstream providers
 - Providers are encouraged to voluntarily disclose information in the Model Documentation Form
- **Quality control:**
 - Providers control documented information for quality and integrity and retain it as evidence of compliance

2. Copyright

- Apply to all providers of GPAI models (Art. 53 (1) lit. c AI Act)
- **Draw up, update and implement copyright policy:** Outlining measures on compliance with EU copyright law

■ Web crawling and compliance with text and data mining ("TDM") opt outs:

- EU copyright law provides exceptions for TDM, unless rightsholders declared an opt-out. The Code requires
- Web crawlers do not circumvent technical measures designed to prevent unlawful access to copyrighted content
- Web crawlers do not access websites recognised to infringe copyright on a commercial scale, for which the EU will publish a list
- Web crawlers identify and comply with a TDM opt-out declared by rightsholders, in particular the robots.txt protocol, but also other means of opt-outs adopted as a technical standard or that are recognized as state-of-the-art
- Providers take appropriate measures to publish information on web crawlers employed at the time of the web crawling and enable automatic updates

■ Mitigate the risk of copyright-infringing outputs:

- Providers implement "appropriate and proportionate" technical safeguards to prevent their models from generating copyright-infringing reproductions
- Copyright-infringing uses of a GPAI model are prohibited in the GPAI model's acceptable use policy or terms and conditions

■ Designate a point of contact and implement a complaint mechanism for rightsholders

■ Training data summary

- In addition to the Code, GPAI model providers must publish a summary of training data in line with the [Template](#) provided by the AI Office (Art. 53 (1) lit. d) AI Act)

3. Safety and Security

- Measures on safety and security requirements **only apply to providers of GPAI models with systemic risk** (Art. 55 AI Act)
- Measures include the adoption and implementation of a safety and security framework, to identify and analyse systemic risks and to implement appropriate safety and cybersecurity protection measures

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