

FIELD	VALUE
System ID	test-credit-ai
Organization	Test Corp
Evidence Period	2026-01-01 to 2026-04-13
Total Attestations	1
Attestations Sampled	1
HCS Topic	0.0.10416909
Annex III Category	Annex III point 5(b) — creditworthiness / credit scoring
Risk Classification	HIGH-RISK
Completeness Score	85%
Report ID	ANNEX4-TEST-CREDIT--202604120714

REGULATORY BASIS

EU AI Act (Regulation (EU) 2024/1689), Article 11 + Annex IV

Regulations in Scope

Every assertion in this document is backed by a cryptographic attestation

REGULATION	DESCRIPTION	ENFORCEMENT DATE	PENALTY
EU-AI-ACT	High-risk AI — full obligations apply	2026-08-02	€15M or 3% global turnover
SR-11-7	Federal Reserve/OCC model risk management — applies to bank AI	2011-04-04	Supervisory action
TX-TRAIGA	Texas AI governance — impact assessment required	2026-01-01	Civil penalty
CO-AI-ACT	Colorado AI Act — algorithmic discrimination prohibited	2026-06-30	CCPA enforcement

SECTION 1 — GENERAL DESCRIPTION

Annex IV §1 | EU AI Act Article 11

This section provides the general description of the AI system as required by Annex IV §1. All information is derived from the system registration record attested to Hedera HCS at registration time.

FIELD	VALUE
Intended Purpose	Credit Underwriting
System Name	Test Credit Underwriting System
Provider / Developer	Test Corp
System Identifier	test-credit-ai
Jurisdictions	EU, DE, US, TX
Registration Date	2026-04-12
Registration Version	2
Configuration Attestation	Pending HCS anchor

Compliance note: The system registration record is cryptographically attested to Hedera HCS and constitutes the technical documentation anchor required by Article 11(1). The registration is immutable and timestamped to the millisecond.

SECTION 2 — DEVELOPMENT PROCESS

Annex IV §2 | EU AI Act Article 10

This section documents the development process evidence available for the evidence period. Each entry represents a cryptographically attested event anchored to HCS.

EVENT TYPE	COUNT	rubricEventType
Deployment Events Attested	0	model.deployment
Training Completion Events	0	model.training-complete
Dataset Registration Events	0	data.dataset-registered
Validation Events	0	model.validation-complete

SECTION 3 — MONITORING AND CONTROL

Annex IV §3 | EU AI Act Articles 12, 13, 14

This section provides evidence of operational monitoring and human oversight as required by Articles 12, 13, and 14. Every inference decision is attested to Hedera HCS with a cryptographic proof of inclusion.

METRIC	COUNT	REGULATORY BASIS
Inference Decisions Attested	1	Art. 12(2)(a) — system operation monitoring
Human Reviews Attested	0	Art. 12(3)(d) + Art. 14 — human oversight
Human Overrides Attested	0	Art. 14 — human override capability
Total Monitored Events	1	Art. 12(2)(c) — deployer monitoring

Decision Outcome Distribution:

OUTCOME	COUNT	% OF TOTAL
approved	1	100.0%

Article 12(3) Mandatory Fields Evidence:

FIELD	STATUS	EVIDENCE	ARTICLE
sessionStartedAt / sessionEndedAt	Mandated	Present in inference attestations	Art. 12(3)(a)
reviewerId	Mandated	Present in human review events	Art. 12(3)(d)
inputHash	Recommended	Available for Annex III biometric systems	Art. 12(3)(c)
datasetId	Mandated	Present in dataset registration events	Art. 12(3)(b)

SECTION 4 — PERFORMANCE METRICS

Annex IV §4 | EU AI Act Article 15

Performance metrics are derived from attested inference events. Confidence scores and latency measurements are attested at decision time and cannot be retroactively modified.

METRIC	VALUE
Inference Events in Period	1
Evidence Period	2026-01-01 to 2026-04-13
Metric Source	Attested confidence + latencyMs fields per inference event
Behavioral Fingerprinting	Available — contact Rubric for aggregate analysis
Drift Detection	Enabled via behavioral fingerprint comparison

SECTION 5 — RISK MANAGEMENT

Annex IV §5 | EU AI Act Article 9

EVENT TYPE	COUNT	rubricEventType
Risk Assessment Events	0	risk.assessment
Bias Detection Events	0	risk.bias-detected

Risk Level Distribution of Decisions:

RISK LEVEL	COUNT
high	1

SECTION 6 — LIFECYCLE CHANGES

Annex IV §6

No lifecycle change events attested in this period. To attest a model version change, submit an attestation with rubricEventType: 'model.version-change'.

SECTION 7 — STANDARDS APPLIED

Annex IV §7 | EU AI Act Article 40

STANDARD	STATUS	EFFECT
NIST AI RMF 1.0	Applied	TX TRAIGA §107 safe harbor: UNLOCKED
ISO/IEC 42001:2023	Applied where declared	EU AI Act Art. 40 presumption of conformity
EN ISO/IEC 24970	Forthcoming	AI system logging standard
EU AI Act (Reg. 2024/1689)	Directly applied	Primary regulatory framework

Safe Harbor Status:

✓ **UNLOCKED TX** — TX TRAIGA §107: NIST AI RMF 1.0 or ISO 42001 implementation

■ **Conditions not yet met EU** — EU AI Act Art. 40: Compliance with harmonised standards (ISO 42001, EN ISO/IEC 24970)

SECTION 8 — DECLARATION OF CONFORMITY

Annex IV §8 | EU AI Act Article 47

IMPORTANT: The EU Declaration of Conformity is a legal assertion made by the **provider** of the high-risk AI system — not by Rubric Protocol. Rubric provides the cryptographic evidence base that makes this declaration defensible.

This evidence package provides the technical documentation required to support the EU Declaration of Conformity for system 'test-credit-ai' under Regulation (EU) 2024/1689 (EU AI Act). The provider (Test Corp) is responsible for signing and maintaining the Declaration of Conformity in accordance with Article 47.

SECTION 9 — POST-MARKET MONITORING

Annex IV §9 | EU AI Act Article 72

Post-market monitoring evidence covers the full period of system operation. The continuous attestation stream constitutes the post-market monitoring plan required by Article 72.

METRIC	COUNT/VALUE	REGULATORY BASIS
Incidents Detected	0	Art. 73 — 15-day notification trigger if severity=serious
Drift Detection Events	0	Art. 72 — performance monitoring
Scheduled Monitoring Reviews	0	Art. 72 — post-market monitoring plan
Continuous Attestation Stream	1 events	Art. 72 — systematic data collection

APPENDIX A — ATTESTATION CHAIN

Cryptographic Evidence Index

The following sample attestation IDs represent the cryptographic evidence chain for this period. All 1 attestations are independently verifiable at <https://rubric-protocol.com/v1/verify/{attestationId}>.

ATTESTATION ID	VERIFICATION URL
cc9ff517-2777-461e-985c-c077adc1557e	https://rubric-protocol.com/v1/verify/cc9ff517-2777-461e-985c-c077adc1557e

HCS Topic: 0.0.10416909 | Total Evidence Events: 1 | Report Generated: 2026-04-12 07:14 UTC

LEGAL NOTICES

This Annex IV Evidence Package is generated by Rubric Protocol (Echelon Intelligence Group LLC) from cryptographic attestation records anchored to the Hedera Consensus Service mainnet.

This document does not constitute a conformity assessment or legal opinion. The EU Declaration of Conformity must be signed by the provider of the high-risk AI system. Rubric provides the technical evidence base that supports such a declaration.

All attestation IDs referenced in this document are independently verifiable on the Hedera network via HCS Topic 0.0.10416909 and at <https://rubric-protocol.com/v1/verify/{attestationId}>.

Retention: This report and the underlying attestation records must be retained for a minimum of 10 years per EU AI Act Article 18.

Rubric Protocol uses post-quantum ML-DSA-65 signing for all attestations, providing cryptographic evidence that is resistant to quantum computing attacks.