



ALERT MAY 2026:
ARTIFICIAL INTELLIGENCE:
PRELIMINARY OVERVIEW TO PREVENT SANCTIONS

1

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SILS Law Firm includes professionals specialized in advising on artificial intelligence systems and corporate compliance (for information: milano@silsitalia.it). SILS is certified in accordance with UNI Standard 11871:2022, “*Professional firms of Lawyers and Chartered Accountants – Organizational principles and risk management related to the practice of the profession for the creation and protection of value.*”



European Regulation No. 1689 of 2024 and Italian Law No. 132 of 23 September 2025 set out the European and Italian regulatory framework for artificial intelligence systems, in short “AI”. The aim is preventing the diffusion of AI systems prohibited under Section 5 of the Regulation – those fostering, for instance, the manipulation of individuals or imposing unlawful obligations on manufacturers, distributors and/or providers, which may also have negative consequences for end users (“*deployers*”), depending on the respective levels of risk.

Section 3(i) of the Regulation defines an AI system as follows: “*A machine-based system that is designed to operate with varying levels of autonomy and may adapt after deployment, which, for express or implied objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations or decisions that can influence physical or virtual environments.*”

The regulatory framework adopts a risk-assessment approach, requiring users of AI systems to perform internally: (1) A mapping of active AI software used for business management and its impact on the user’s products or services; (2) The risk level assessment of such active AI systems; (3) The identification of their own role as deployers of the AI systems at issue, and (4) A review of the manufacturers’, distributors’ and/or providers’ declarations of conformity with the Regulation.

We recommend a proper evaluation and adoption of specific contractual clauses aimed at containing the relevant risks and obtain indemnification against liabilities for potential non-compliance with/violations of the regulatory framework by manufacturers, distributors and/or providers of AI systems.

Such preliminary overview will allow stronger awareness of the legal and business environment in relation to AI systems applied for the user’s products and/or services, thus contributing to the avoidance of heavy fines (which may reach 7% of the worldwide turnover achieved in the previous year) and potential criminal liability for alleged violation. Compliance with the regulatory framework governing AI systems also provides the opportunity to employ them responsibly, reduce the risks of interference and manipulation, and improve and speed up the user’s business operations.