



EU AI Act Compliance Statement

EU AI ACT

TROOTH, LLC EUAIA-2026-001

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Reference Frameworks	Regulation (EU) 2024/1689 (the EU AI Act)

1. Executive summary

This statement sets out Trooth, LLC's position under Regulation (EU) 2024/1689. The Company is a provider of AI-assisted features inside one product, the Trooth Network. Every one of those features is a drafting aid: it suggests, and a person decides. None of them is a prohibited practice under Article 5, none falls in a high-risk category under Article 6 or Annex III, and the Company places no general-purpose AI model on the market, so the Article 53 obligations of a GPAI model provider do not fall on it. What does apply is Article 50 transparency, and the Company meets it: content a model drafted is labelled as such wherever it appears.

2. Scope

Trooth, LLC (the Company) operates one product: the Trooth Network, a web application at trooth.co with a public API at api.trooth.co. A company connects its systems, the Network records what is true of them on a schedule with the source and the time of each observation,

and buyers read that record. This statement covers that product, the production database that holds its data, the deployment pipeline that builds it, and the administrative accounts the Company holds with each provider named in its published Sub-processor List. It does not cover preview or development environments, which hold no customer data. As at the effective date the Company has no employees or contractors; every requirement written for personnel applies to the Founder today and to every future person from their first day.

3. The Company's role

Role under the Regulation	Applies	Why
Provider, Article 3(3)	Yes	The Company develops AI-assisted features and places them on the market under its own name inside the Trooth Network.
Deployer, Article 3(4)	Yes, internally only	The Company uses a third-party generative AI service for the Founder's own drafting and analysis. No customer content is sent to it.
Provider of a general-purpose AI model, Article 3(63) and Article 53	No	The Company trains, develops and places on the market no general-purpose AI model. Its features run open-weight models operated by Cloudflare as a sub-processor. The Article 53 obligations, including the technical documentation, the copyright policy and the public summary of training content, fall on the provider of each model, not on the Company. This is set out in full in REG-10.
Importer or distributor, Articles 3(6) and 3(7)	No	The Company places no third party's AI system on the Union market under that party's name.

4. Every AI-assisted feature, and its classification

Feature	What it does	Classification	Basis
Kyrie, the assistant in the product	Answers a question about what the Network holds and drafts text for a person to edit and send	Limited risk: Article 50 transparency applies	Interacts directly with a natural person and generates text, so it is labelled. It makes no decision and takes no action.
Drafted answers to a questionnaire a buyer sends	Suggests wording from what the Network already records about the company	Limited risk: Article 50 transparency applies	A draft a person reviews, edits and sends. It does not submit.

Feature	What it does	Classification	Basis
Suggested mapping between frameworks	Proposes that a control answering one framework also answers another	Limited risk	A suggestion a person accepts or rejects. Not an assessment of a person.
Summarising a document a company shared	Produces a short description of a document's contents	Limited risk: Article 50 transparency applies	Generated text, labelled as generated.

No feature listed above evaluates a natural person, and none is used for recruitment, education, credit, insurance, essential services, law enforcement, migration, biometrics or the administration of justice. The Network records what is true of companies. Where a natural person appears in its data at all, it is as a named contact of a company, and no feature scores, ranks, profiles or makes any decision about that person.

5. Article 5: prohibited practices

The Company operates none of the practices Article 5 prohibits. It deploys no subliminal, manipulative or deceptive technique; exploits no vulnerability of age, disability or social or economic situation; operates no social scoring of natural persons; makes no risk assessment of a natural person committing a criminal offence; scrapes no facial images to build a recognition database; infers no emotion in the workplace or in education; uses no biometric categorisation to deduce a protected characteristic; and operates no remote biometric identification of any kind.

6. Article 50: the transparency obligations that do apply

- A person interacting with an AI-assisted feature is told they are interacting with one, at the point of interaction, in the product itself.
- Text a model generated is labelled as an AI draft wherever it appears. An observation the Network recorded about a company is a recorded fact with a source and a timestamp, is never labelled as an AI draft, and is never produced by a model.
- A build gate keeps the two apart, and the labelling is asserted by the test suite on every change rather than left to review.
- The Company publishes an AI Use Policy at truth.co/ai-policy, an AI Disclosure at truth.co/ai-disclosure and a model card at truth.co/model-card, each naming the intended use, the users, the inputs and outputs, the approach and the limitations of every AI-assisted feature.

7. Governance, and the dates that matter

Provision	Applies from	Position
Chapter I and Chapter II: definitions, AI literacy, prohibited practices, Article 5	2 February 2025	Met. No prohibited practice is operated, and the Founder, who is the only person operating the system, maintains the AI literacy the Article 4 obligation describes.
Chapter V: general-purpose AI models, Articles 51 to 56	2 August 2025	Not applicable to the Company: it provides no general-purpose AI model. See REG-10.
Article 50 transparency	2 August 2026	Met on the effective date of this statement, ahead of the date it is required.
Chapter III: high-risk systems	2 August 2026 and 2 August 2027 by category	Not applicable: the Company provides no high-risk AI system. If a future feature would fall in Annex III, the Company will classify it before release and say so here.

The Company signed the European Commission's AI Pact commitments ahead of the Regulation's application and is listed on the Commission's public roster of signatories. Its AI governance is written down in POL-19, the AI Governance and Acceptable AI Use Policy, and mapped to the NIST AI Risk Management Framework in NIST-AI-RMF-2026-001.

8. Union representative and market surveillance

The Company monitors the guidance and the harmonised standards as they are published and will re-issue this statement when either changes what it should say. It has appointed no authorised representative in the Union under Article 22, which applies to providers established in a third country that place a high-risk AI system on the Union market; the Company places none. Whether the separate obligation under Article 27 of the GDPR applies to its processing is a question recorded for counsel and stated as open on the published Trust Center.

Reference: Regulation (EU) 2024/1689 Articles 3, 4, 5, 6, 22, 50, 51-56, Annex III. Related: truth.co/ai-policy; truth.co/ai-disclosure; truth.co/model-card; POL-19 AI Governance and Acceptable AI Use; REG-10 EU AI Act Article 53; CERT-002 EU AI Pact; NIST-AI-RMF-2026-001.

Authorization

This statement is issued by Trooth, LLC under the authority of its Founder and Sole Member and describes the Company as it operates on its effective date. It is a published statement of the Company and requires no signature to bind it; the version published at truth.co/security

is the current one, and an earlier version, including any signed version of June 8, 2026, is superseded in full. It is not a certification and not an audit opinion: Trooth holds no audited certification against any framework and does not represent otherwise. Where this statement and the live service disagree, the service is corrected or the statement is re-issued, and the Company's published Trust Center states, control by control, what is in place and what is not.