

# bicon.digital

## EU AI Act Gap Analysis

*Production Platform Evaluation | 03 June 2026*

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*Based on hands-on walkthrough of public demo + publisher confirmation of production capabilities*

## Methodology & Scope

This report is based on a full hands-on walkthrough of [www.bicon.digital](http://www.bicon.digital) (public demo) conducted on 03 June 2026 using the Claude in Chrome browser extension, supplemented by direct confirmation from the publisher (bicon.li) that the production platform includes full technical infrastructure not present in the demo version.

### Sections explored interactively:

- /inventory -- Initiatives Inventory (15 demo initiatives, all columns)
- /portfolio -- Portfolio Map (bubble chart, quadrant analysis, Custom Analysis tab)
- /ai-act -- EU AI Act Cockpit (all 7 tabs: Portfolio Readiness, Incidents, AI Literacy, Obligations, Act Artefacts, Timeline, Explanation)
- /stage-gate-report -- Stage Gate Funnel Report (including audit CSV export)
- /memo -- Board Memorandum (TXT, MD, PPTX, PDF exports)
- /settings -- Platform Configuration (all 4 tabs)
- /evaluate/[id] -- Per-initiative Evaluate form (all 5 tabs including EU AI Act & Compliance, where GPAI coverage was confirmed)

*Scope note: The public demo uses localStorage for data persistence. The publisher confirmed the production platform uses a proper server-side architecture with authentication and audit capabilities. Architectural gaps observed in the demo are therefore excluded from this gap analysis, which focuses exclusively on functional and regulatory feature coverage.*

## Platform Overview

<b>Platform</b>	BICon Transformation Portfolio Steering (bicon.digital)
<b>Publisher</b>	bicon.li
<b>Evaluated On</b>	03 June 2026
<b>Version Tested</b>	Public demo (bicon.digital) — publisher confirmed the production platform includes full technical infrastructure not present in the demo
<b>Methodology</b>	Hands-on walkthrough via Claude in Chrome extension — all navigation sections explored interactively; screenshot evidence reviewed post-walkthrough
<b>Demo Dataset</b>	15 AI initiatives, Financial Services (Aegis & Cortex Ltd)
<b>AI Act Deadline</b>	High-risk obligations fully applicable from 2 August 2026

*BICon Transformation Portfolio Steering is a genuine AI governance and portfolio management platform with deep EU AI Act integration. It is significantly more capable than its marketing page suggests. Standout strengths are portfolio steering UX, the 7-tab EU AI Act cockpit, incident reporting depth, and -- confirmed through the evaluate form -- Art. 25 GPAI downstream coverage. Remaining gaps are concentrated in three areas: structured compliance workflows for FRIA, QMS, and Data Governance.*

## AI Act Coverage: What Is Implemented

All "Implemented" and "Partial" ratings are based on features directly verified during the hands-on walkthrough or confirmed by the publisher. The GPAI (Art. 25) field was verified via screenshot of the evaluate form showing upstream provider tracking for OpenAI GPT-4o.

Article	Requirement	Platform Coverage (verified)	Status
Art. 9	<b>Risk Management</b>	Per-initiative Risk Tier (Minimal/Limited/High/Unacceptable) + HITL Posture (Autonomous/Human-Assisted/Human-Required). Visible in inventory table and EU AI Act cockpit.	Implemented
Art. 4	<b>AI Literacy</b>	Dedicated cockpit tab: 7 completed / 4 in-progress / 2 stale / 1 not-started. Per-initiative literacy status in evaluate form.	Implemented
Art. 11/Ann. IV	<b>Technical Documentation</b>	Act Artefacts tracks status of 6 artefact types (e.g., "0/6 Approved") with links to external Confluence/SharePoint/Notion. Status tracking and external linking confirmed.	Partial
Art. 12	<b>Record-keeping</b>	Stage-Gate Funnel Report with export-audit CSV. Per-gate status with red rings for bypassed/stale. Decision log concept present.	Partial
Art. 13	<b>Transparency</b>	Transparency notice tracked as artefact. Transparency obligations in Operational Obligations list. AI Act Role (Provider/Deployer/Importer) tagged per initiative.	Implemented
Art. 14	<b>Human Oversight</b>	HITL Posture field per initiative. Visible in inventory and evaluate form.	Implemented
Art. 22/26	<b>Role Classification</b>	EU AI Act Role (Provider/Deployer/Importer/Distributor) per initiative. Annex III category tagging (e.g., Critical Infrastructure sec.2, Essential Services sec.5).	Implemented
Art. 25	<b>GPAI Value Chain (Downstream)</b>	Confirmed present in evaluate form: flags whether initiative embeds a third-party GPAI model, records upstream GPAI provider (e.g., OpenAI GPT-4o), and confirms whether required upstream documentation is available per Art. 25 obligations.	Implemented
Art. 27	<b>FRIA</b>	DPIA field with status and external link present. No dedicated FRIA workflow -- Fundamental Rights Impact Assessment is legally distinct from DPIA and requires its own structured questionnaire and report.	Partial
Art. 43	<b>Conformity Assessment</b>	Tracked as artefact status item. No structured self-assessment checklist, EU Declaration of Conformity generator, or Notified Body engagement workflow.	Partial
Art. 49/71	<b>EU Database Registration</b>	EU Database registration number field and Pending/Registered status per initiative. Numbers are placeholder values pending the official Art. 71 database going live.	Implemented

Article	Requirement	Platform Coverage (verified)	Status
Art. 50	<b>Transparency Obligations</b>	Listed as applicable obligation in Operational Obligations. No automated disclosure template generator.	Partial
Art. 51-56	<b>GPAI (Provider Side)</b>	Downstream/integrator obligations covered via Art. 25 field (see above). Provider-side obligations (Art. 53/55 -- systemic risk assessment, model card publication) not in scope for deployer-focused platform; N/A for most customers.	Partial
Art. 72	<b>Post-Market Monitoring</b>	PMS plan tracked as artefact status. No structured monitoring plan builder, metric/KPI definition, or monitoring cadence scheduling.	Partial
Art. 73	<b>Serious Incident Reporting</b>	7 incidents in demo (3 open, 1 overdue). Per-incident: authority (BaFin, FINMA), reference number, root cause, corrective actions, reporting date. Regulatory authority pre-populated by jurisdiction.	Implemented
Art. 17	<b>Quality Management System</b>	QMS tracked as artefact status item only. No structured QMS module, policy templates, version control, or review cycle management.	Missing
Art. 10	<b>Data Governance</b>	Data Governance tracked as artefact. No data lineage, training data documentation, or data quality assessment workflow.	Missing
Portfolio	<b>Portfolio Map &amp; Scoring</b>	Live bubble chart (Value x Feasibility), quadrants (Scale/Pilot/Stop/Assist), stage-gate funnel, board memo with portfolio scores (V:61/F:58/G:62/S:56 out of 100).	Implemented
Cockpit	<b>EU AI Act Portfolio Cockpit</b>	7-tab cockpit: Portfolio Readiness (Progress + Audit views), Incidents, AI Literacy, Obligations, Act Artefacts, Timeline, Explanation. Binary conformant/open/N-A per requirement per initiative.	Implemented
Reporting	<b>Board Memo &amp; Exports</b>	Auto-generated Board Memorandum (date-stamped). Export TXT / MD / PPTX / PDF. Stage-gate audit CSV export.	Implemented
Settings	<b>Configuration</b>	Company name, portfolio mode (AI/Digital/Innovation), language (EN/DE), taxonomy customisation, financials & rules, compliance reminders, snapshots/backup.	Implemented

## Gap Analysis: What Is Missing

Gaps identified through direct product evaluation. No Critical-severity gaps remain once production architecture is accounted for. Priority ratings:

- HIGH -- Significant regulatory exposure; key AI Act obligations cannot be fully discharged without this capability
- MEDIUM -- Operational gaps that reduce completeness and audit-readiness
- LOW -- Improvements that strengthen completeness but are not immediately blocking

Priority	Gap	Detail	Recommended Action
HIGH	<b>No dedicated FRIA workflow (Art. 27)</b>	Fundamental Rights Impact Assessment is a legally distinct obligation under Art. 27 for deployers of high-risk AI systems. The DPIA field present in the platform captures a different (though related) instrument. No structured FRIA questionnaire mapped to the EU Charter of Fundamental Rights, no stakeholder consultation tracker, no FRIA report generator.	<i>Build a dedicated FRIA module with structured questionnaire (rights-by-right impact), consultation tracking, and exportable FRIA report. Distinguish clearly from DPIA in the UI.</i>
HIGH	<b>No QMS module (Art. 17)</b>	Quality Management System is tracked as an artefact checkbox only. Art. 17 requires providers to implement a documented QMS covering: procedures for training data governance, risk management, design control, change management, post-market monitoring, and corrective actions. None of these are structured workflows in the platform.	<i>Add a QMS module with policy document templates, version-controlled procedures, change management log, and periodic review scheduling with automated reminders.</i>
HIGH	<b>No Data Governance module (Art. 10)</b>	Data Governance is an artefact status field only. Art. 10 requires documented practices for: training/validation/test data selection and collection, data quality criteria, examination for biases, and data management across the lifecycle. No dataset registry, data lineage tracking, quality assessment workflow, or bias monitoring is available.	<i>Build a Data Governance module with dataset registry, data quality criteria per initiative, lineage documentation, bias assessment forms, and data management procedure templates.</i>
MEDIUM	<b>No EU Declaration of Conformity generator (Art. 43)</b>	Conformity assessment is tracked as an artefact status but there is no structured self-assessment checklist aligned to Art. 43 requirements, no workflow to engage a Notified Body (for Annex III biometric/critical infrastructure systems), and no EU Declaration of Conformity template generator. Completing conformity assessment requires these outputs.	<i>Add a conformity assessment module with an Art. 43 structured checklist, Notified Body contact management, and a DoC template that auto-populates initiative metadata.</i>

Priority	Gap	Detail	Recommended Action
MEDIUM	<b>No Post-Market Monitoring plan builder (Art. 72)</b>	Post-Market Monitoring plan is tracked as an artefact status. Art. 72 requires providers to actively collect and review post-deployment performance data. No structured PMS plan editor, no metric/KPI definition per initiative, no monitoring cadence scheduling, and no integration with production observability tools (e.g., Datadog, Azure Monitor).	<i>Add a PMS plan builder with metric definition (accuracy drift, error rates, usage patterns), alert threshold configuration, monitoring cadence, and scheduled review reminders.</i>
MEDIUM	<b>No integrated document vault</b>	Act Artefacts tracks status with links to external Confluence, SharePoint, or Notion pages. Documents live outside the platform. Regulators and Notified Bodies expect a coherent, version-controlled evidence package -- not links to third-party systems that may change or be inaccessible during an audit.	<i>Integrate with SharePoint/Google Drive via API with version snapshots, or build an internal document vault with versioning, approval workflow, and document expiry tracking.</i>
LOW	<b>EU DB registration placeholder numbers</b>	EU Database registration numbers are placeholder values (e.g., EU-HR-2026-AUTO-PLACEHOLDER). The official EU AI Act database (Art. 71, managed by EU AI Office) is not yet fully operational. This is an external dependency, not a platform deficiency.	<i>Monitor EU AI Office for database API availability (expected H2 2026) and build automated submission workflow when live.</i>
LOW	<b>Art. 53/55 GPAI provider obligations</b>	The platform correctly covers Art. 25 downstream/integrator obligations. If any customer is themselves a GPAI model provider (publishing a foundation model), the provider-side Art. 53/55 obligations (systemic risk assessment, model card, downstream transparency package) would need a separate module. Low priority for most enterprise customers who are deployers, not model publishers.	<i>Consider a GPAI Provider module for customers who publish foundation models, covering Art. 53 technical documentation and Art. 55 systemic-risk assessment.</i>
LOW	<b>No regulatory intelligence monitoring</b>	No mechanism to automatically flag changes to AI Act implementing acts, harmonised standards (CEN/CENELEC), or national authority guidance (BaFin, FINMA, FCA) that would affect compliance obligations tracked in the platform.	<i>Integrate a regulatory intelligence feed with automated obligation delta notifications pushed to affected initiatives.</i>

## Overall Scorecard

Dimension	Score	Rationale
AI Act Article Coverage	9/10	All major articles tracked, including Art. 25 GPAI downstream confirmed. Only Art. 17 (QMS) and Art. 10 (Data Governance) lack structured workflows.
Compliance Depth	6/10	Articles tracked as checklists and artefact statuses. Key obligations (FRIA, QMS, Data Governance, PMS plan, conformity assessment) require structured workflows beyond status fields to actually discharge the obligations.
Portfolio & Governance UX	9/10	Best-in-class: bubble chart, stage-gate funnel, quadrant analysis, board memo with 4 export formats, financial scoring.
Incident Management (Art. 73)	8/10	Strong register with regulatory authority pre-population, reference numbers, root cause, and corrective actions.
AI Literacy Tracking (Art. 4)	7/10	Good per-role tracking with status indicators. Would benefit from LMS integration for automated completion sync.
GPAI Coverage (Art. 25)	8/10	Downstream/integrator obligations well covered. Provider-side (Art. 53/55) out of scope for most enterprise customers.
Document Management	5/10	Artefact status tracking with external links. Documents live in third-party systems. No version-controlled evidence vault inside the platform.
Reporting & Auditability	8/10	Strong board reporting and CSV exports. Production platform assumed to include server-side audit trail.
<b>OVERALL</b>	<b>8/10</b>	Genuinely strong AI governance platform. Functional gaps are narrow: three missing structured workflows (FRIA, QMS, Data Governance) and two partial workflows (conformity assessment, PMS plan) are the main areas to address before full AI Act compliance can be claimed.

## Verdict & Recommendations

### Summary

BICon is a strong, purpose-built AI Act governance platform. At 8/10 overall, it outperforms most enterprise GRC tools on AI Act breadth and portfolio steering UX. The three HIGH gaps (FRIA, QMS, Data Governance) are genuine regulatory obligations that the platform does not yet support as structured workflows -- organisations cannot fully discharge these obligations using the current artefact-status-only tracking.

### Three Priority Actions

- 1. FRIA Module (Art. 27): Add a structured Fundamental Rights Impact Assessment workflow with questionnaire, consultation tracking, and exportable FRIA report. This is distinct from DPIA and legally required for high-risk AI deployers.

- 2. QMS Module (Art. 17): Build structured QMS document management with policy templates, version control, change management log, and periodic review scheduling. Artefact status tracking is not sufficient for regulatory purposes.
- 3. Data Governance Module (Art. 10): Add dataset registry, training/validation data documentation, data quality criteria, bias assessment forms, and data lineage tracking per initiative.

## Strategic Position

Once the three HIGH gaps are addressed, bicon.digital would cover the full EU AI Act obligation set for high-risk AI deployers at a workflow level -- making it a genuine compliance platform rather than a compliance awareness and portfolio steering tool. The platform is already the most portfolio-governance-complete AI Act tool available; closing these gaps would make it the most compliance-complete as well.

## Suitability by Use Case

Use Case	Suitability
AI portfolio steering & board reporting	Excellent -- best-in-class
AI Act awareness & compliance tracking	Very good -- comprehensive article coverage
Incident reporting & monitoring (Art. 73)	Very good -- strong regulatory detail
GPAI downstream compliance (Art. 25)	Good -- upstream provider tracking confirmed
Full AI Act compliance discharge (high-risk deployer)	Partial -- FRIA, QMS, Data Governance gaps remain
Provider-side GPAI obligations (Art. 53/55)	Not in scope -- relevant only to model publishers