

EU AI Act Article 50 Transparency Evidence Pack

A signed, hash-chained evidence record — see the final section for how to verify it independently, without relying on Clause50.

87.5%

Coverage score

3 of 4

Requirements satisfied

1

Active items

5

Evidence items



System	Demo — Support assistant (chatbot)
System ID	cmu6ekd020004ga1k2utr5oyyp
Organisation	Ostrahaven Energy (specimen)
Purpose	Customer-support assistant on Ostrahaven Energy’s web portal, mobile app, WhatsApp number and telephone line. Answers questions about meter readings, bills and moving home; hands over to a colleague on request. Built by Ostrahaven on a licensed dialogue model and offered to customers under Ostrahaven’s own name.
Actor role	Provider
Rule pack	2026.19
Template	EU AI Act Article 50 Transparency Evidence Pack
Generated	18 September 2026, 03:32 UTC (2026-09-18T03:32:22.700Z)

Classification

What the recorded answers engage: Article 50 transparency — applies now

2 obligation(s) in this rule pack apply to this system on its recorded answers, all of them in force today.

Not confirmed. Nobody at the organisation has reviewed or confirmed this reading. It is printed as unconfirmed rather than omitted: what was recorded, and what was not, are both facts about this system's record.

This states the scope of the evidence Clause50 is assembling under the rule pack cited above, read off the answers recorded for this system. It is not a legal classification of this system, and it is not legal advice. Any confirmation shown above is the operator's own statement, recorded and reproduced by Clause50, not assessed by it. Put this document to your legal adviser.

1. System identification

This pack documents how the AI system identified below meets the transparency obligations of Article 50 of Regulation (EU) 2024/1689. It is generated from the operator's system record and the evidence items attested or ingested for the current system version. It is evidence of transparency measures, not legal advice.

Confirm the system name, intended purpose, and the operator's role (provider, deployer, or both) match the deployment under audit.

Not assessed by Clause50 — this section is not yet supported, and this document makes no statement about it either way. Its absence here is not a finding.

2. Interaction disclosure — Art. 50(1)

Article 50(1) requires providers to ensure that systems intended to interact directly with natural persons are designed so those persons are informed they are interacting with an AI system, unless that is obvious to a reasonably well-informed person.

Look for disclosure at or before the first interaction.

Providers shall ensure that AI systems intended to interact directly with natural persons are designed and developed in such a way that the natural persons concerned are informed that they are interacting with an AI system, unless this is obvious from the point of view of a natural person who is reasonably well-informed, observant and circumspect.

Art.50(1) — Disclosure implementation

STATUS: SATISFIED

Screenshot or config showing AI-disclosure at or before first interaction (UI text, system prompt, or API metadata), uploaded and attested item by item against the checklist.

Art.50(1) — Disclosure in traces

STATUS: PARTIAL

Sampled conversation traces demonstrating disclosure precedes first substantive turn.

Art.50(1) — System in operation

STATUS: SATISFIED

System in active production use during the period — machine-observed usage activity (request/token counts) from a connected provider when available, or an operator attestation otherwise.

3. Synthetic-content marking — Art. 50(2)

Article 50(2) requires providers to mark synthetic audio, image, video or text outputs in a machine-readable format and as artificially generated or manipulated.

Providers of AI systems, including general-purpose AI systems, generating synthetic audio, image, video or text content, shall ensure the outputs of the AI system are marked in a machine-readable format and detectable as artificially generated or manipulated. (Code of Practice, June 2026, is the practical benchmark. Systems on market before 2026-08-02 have until 2026-12-02 per Omnibus.)

Art.50(2) — Marking mechanism

STATUS: SATISFIED

Watermark/metadata/provenance mechanism per applicable modality (C2PA, metadata tags, standardised EU label), uploaded and attested item by item against the checklist.

Proven by: machine-readable artefact (T2) — published by Fennwright Labs, at <https://docs.fennwright.example/transparency/text-marking> and retrieved 2026-08-09T03:32:21.827Z.

This is a statement published by the upstream model provider, not an artefact produced by this system's own outputs. It is recorded as submitted and has not been verified against the provider by Clause50.

This evidence establishes that the artefacts submitted were marked. **It does not establish that every output of the system is marked** — no sample was declared with it.

4. Emotion recognition / biometric categorisation notice — Art. 50(3)

Article 50(3) requires deployers of emotion-recognition or biometric-categorisation systems to inform exposed natural persons of the system's operation. Where no such capability is present this section is not applicable to the system.

Not applicable to this system — no capability recorded that engages this obligation.

5. Deepfake and public-interest text labelling — Art. 50(4)

Article 50(4) requires deployers to disclose deep-fake image, audio or video content and AI-generated text published to inform the public on matters of public interest, subject to the editorial-responsibility exception.

Not applicable to this system — no capability recorded that engages this obligation.

6. Evidence register and hashes

Section 6a, "Basis of assessment", lists every evidence item this pack's scoring engine actually relied on to decide each requirement's status — not every item of a matching kind, but the specific items the verdict is a function of, for every requirement whether it was satisfied, partial, missing or stale. Each row shows its content hash, the requirement(s) it was relied on for, who attested it, and — for a manual attestation — exactly which checklist items were claimed; where an item was relied on by more than one requirement, every one is listed. This register does not confirm that a claim is true — only this app's stated evidence checks can do that, and are reflected in the coverage score above — but it puts the claim itself, the claimant, and any correlated document side by side in the signed document, so a later audit can compare what was asserted against what was actually submitted. Section 6b, "Evidence shipped, not relied on", lists evidence held in this system's chain and included with this pack for completeness — the operator's own uploads and connector data — that no requirement in this pack relied on to reach its status; a further count of unbundled chain items, by kind, follows for full disclosure. The hashes throughout tie back to the append-only evidence chain and to the signed manifest accompanying this document.

6a. Basis of assessment

Evidence ID	Kind	Document	Requirement	Recorded	Attested by	Claimed items	Content hash
cmu6ekd3v0008ga1k6xajqr67	Config snapshot · machine-readable artefact (T2)	ostrahaven-assistant-marking-config.json	Marking mechanism	2026-09-18 03:32 UTC · covers 2026-08-08 → 2026-08-09	—	—	59e7444d01f558ebe25a96ee8f0f5424f5d25da38ac579db39c7af8e0d43bf14
cmu6ekd53000aga1k3tlvem4	Doc upload	ostrahaven-assistant-disclosure-v1.pdf	Disclosure implementation	2026-09-18 03:32 UTC	—	—	7290d41d48d23b5e035db7f2151e4cb03db53c9303588045c2b031578a8984e9
cmu6ekdj60026ga1k2d6b38a3	Attestation	—	Marking mechanism	2026-09-18 03:32 UTC	—	Text, Marking live since transitional period	f1de383a8b5a477ff04234abdd687fc805c0a2068549b51a9472b2bc56b6b6c1
cmu6ekdj0028ga1k92zzrh1s	Attestation	—	Disclosure implementation	2026-09-18 03:32 UTC	—	Disclosure text deployed, Shown before first interaction, Covers all entry points, Deployment location recorded, Current for this version	9ac43a7845d091055765c5aa27fd919f3b2efb22d1d35dd3bcb4dbca04a29f50

1 Trace batch item(s) (2026-09), relied on for: Disclosure in traces — see §6b, digest 13648e5345658321495eb112f226f978118cd359cdb2d46bf691ad174fed0afa.

30 Usage stat item(s) (2026-09), relied on for: System in operation — see §6b, digest 6384e3ef9b5b6bdc1794cd19d4656e535bc6b3ff04b299a9c5acd3fe5dbfba1a.

6b. Activity in period

Rolled-up event-kind evidence (Trace batch, Usage stat, Eval result, Commit ref) — see the main document's §6a for what any of these groups was relied on to prove. Groups backing a current status above are always shown here regardless of the window below; pure-activity groups (nothing currently relies on them) are shown only when they fall inside it.

Activity window: since system inception (no prior finalized artifact)

Period	Kind	Requirement (s)	Items	Digest	First → Last
2026-09	Eval result	—	1	335de3484aea62a3e32820e3937d10ee2f3f651b630a675ee9123d562b0ec4eb	2026-09-18 → 2026-09-18
2026-09	Trace batch	Disclosure in traces	1	13648e5345658321495eb112f226f978118cd359cdb2d46bf691ad174fed0afa	2026-09-18 → 2026-09-18
2026-09	Usage stat	System in operation	30	6384e3ef9b5b6bdc1794cd19d4656e535bc6b3ff04b299a9c5acd3fe5dbfba1a	2026-09-18 → 2026-09-18

6c. Evidence shipped, not relied on

Evidence held in this system's chain and shipped with this pack, that no obligation in this pack relied on to reach its status.

Evidence ID	Kind	Document	Requirement	Recorded	Attested by	Claimed items	Content hash
cmu6ekd6c000cga1kqjmcppww	Doc upload	ostrahaven-ai-transparency-policy.md	—	2026-09-18 03:32 UTC	—	—	cfa5f144ef9ac47478d3cd501795e3efb11d4c2728efc0514180373d870e1b5c

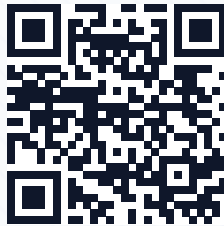
7. Gaps and remediation plan

This table lists every requirement in this pack that is not yet fully evidenced for the current system version — missing, partial, or stale — together with the evidence that would close it, the responsible role, and the date the obligation takes effect. Requirements that are already satisfied, or that do not apply to this system, are not repeated here.

Assign an owner and a target date to each row before the effective date shown.

Requirement	Obligation	Status	What would close it	Responsible role	In effect from
Disclosure in traces	Art.50(1)	Partial	Sampled conversation traces demonstrating disclosure precedes first substantive turn.	Provider	In effect

8. Cryptographic signature seal



This document is signed, auditor-readable evidence of what your system can demonstrate about its compliance at the time of generation.

What is signed:

- Per-requirement status
- Per-item evidence hash (immutable audit trail of what was submitted)
- Per-system chain-head hash (append-only; any tampering is detected)
- An Ed25519 detached signature over the manifest

Key: key-specimen-test

Chain head: 4cc8b0bcbe4b5dc76a0bf9f0612d64b74076e3ccb73185c5aeafb5ecac6d7614

Evidence items: 5

Rule pack: 2026.19

How to verify:

1. **Online:** Drop the ZIP at <https://clause50.com/verify>
2. **CLI:** `npm run verify -- manifest-bundle.json --public-key <key>` (key from the registry)
3. **Manual:** Extract the ZIP, curl the registry, and use tweetnacl to verify the signature

9. Disclaimers and scope limitations

9.1 What this proves (in scope):

- This document was produced by Clause50 and has not been altered since it was signed.

9.2 What this does NOT prove (out of scope):

- That the evidence is accurate or complete.
- That your system actually complies with the regulation (compliance is an operational and legal matter, not a document matter).
- That you have submitted all the evidence you have. A party holding both this database and the signing key can produce a valid manifest over a curated subset of evidence. This is a limit every compliance-audit tool has, and most do not admit it.
- That an evidence item's CONTENT matches what it claims to be. Clause50 confirms an item's presence, timestamp, and cryptographic hash, and — for a manual attestation — the checklist the operator claimed; it does not independently parse or verify that an uploaded watermark, disclosure notice, or marking mechanism actually functions as described.
- Section 6a lists the evidence this document's scoring actually relied on for each requirement; section 6b lists rolled-up event-kind activity; section 6c lists evidence held in your chain and shipped with this pack that no requirement in this pack relied on.
- Evidence images reproduced in this document are resized and re-compressed for print; they are re-verified against the recorded content hash before rendering, but the embedded picture is not byte-identical to the uploaded file. The original, full-resolution file is included unmodified in this pack's export ZIP, under `evidence/`.