

AI REGULATION · PLAIN-ENGLISH GUIDE

The EU AI Act after the Digital Omnibus: **what applies to Copilot rollouts now**

Regulation (EU) 2026/1744, the Digital Omnibus on AI, came into force on 27 July 2026. It delayed the high-risk rules and softened the AI literacy duty, but the Act still applies. This guide sets out the dates and the practical steps for organisations rolling out Microsoft 365 Copilot. It is not legal advice.

Key dates

2 Feb 2025	Prohibitions and AI literacy (Article 4) applied
2 Aug 2025	General-purpose AI model obligations applied
27 Jul 2026	Digital Omnibus (Regulation (EU) 2026/1744) in force
2 Aug 2026	Act applicable with some exceptions. Article 50 transparency duties apply
2 Dec 2026	Article 50(2) marking for generative AI systems placed on the market before 2 Aug 2026. New prohibitions in Article 5(1)(ba) and (bb)
2 Dec 2027	High-risk rules for Annex III systems, including employment uses
2 Aug 2028	High-risk rules for AI in products under Annex I

AI literacy: softened, not removed

Article 4 as amended says providers and deployers "shall take measures to support the development of AI literacy of their staff and other persons dealing with the operation and use of AI systems on their behalf", and that this "does not require providers or deployers to guarantee any specific level of AI literacy of any individual".

So "AI literacy is no longer required" is wrong. The duty is lighter and more practical, and the Commission is due to publish practical compliance examples.

Five practical steps for Copilot rollouts

1

Keep an AI literacy programme for Copilot users

Documented, role-based and proportionate. There's no mandated format, exam or number of hours.

2

Keep an inventory of the AI systems and agents you use

Including Copilot agents. The Microsoft 365 admin centre Agent Registry is a good starting point.

WHERE M365 admin centre > Agents > All agents > Registry

3

Add a check for public-facing AI content

Decide who reviews AI-drafted text before it's published to inform the public.

4

Flag HR and recruitment uses early

Any Copilot or agent use in recruitment or worker-management decisions should get a high-risk assessment well before 2 December 2027.

5

Watch for the Commission's AI literacy examples

Update your programme when they're published.

Common misreadings

- "The AI Act was delayed" is only true for the high-risk rules. Transparency and general-purpose AI rules were not delayed.
- "AI literacy no longer applies" is wrong. The duty was softened, not deleted.
- UK organisations can be in scope when their AI systems or outputs are used in the EU. Take legal advice for your situation.

Sources

1. Regulation (EU) 2026/1744, Official Journal - eur-lex.europa.eu/eli/reg/2026/1744/oj
2. European Commission AI Act page - digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai
3. Gibson Dunn summary of the Omnibus agreement - www.gibsondunn.com/eu-ai-act-omnibus-agreement-postponed-high-risk-deadlines-and-other-key-changes/

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