

# Compliance Brief — Six Weeks to Article 50

MNNR LLC · TOHID NAEEM, Founder · 2026-06-08

*For: Engineering, Compliance, and InfoSec leads at any organization deploying agentic-payment flows in the EU*

---

## Lead

**Six weeks to EU AI Act Article 50 applicability. Here is the checklist your engineering team needs.**

If your organization runs an agent that initiates a payment, signs a contract, or executes a commerce flow in the EU after **2026-08-02**, this brief is for you. Three pages. One checklist. Direct.

---

## Page 1 — Article 50 obligations summary

The EU AI Act enters Article 50 (transparency obligations) applicability on **2026-08-02**. For agentic-payment deployments, the operative obligations are:

### **Obligation A — Self-identification.**

Any AI system that interacts with a natural person, or that executes in a commerce flow on behalf of a natural person, must disclose its AI status. For an agent paying on a user's behalf, the disclosure must be machine-verifiable and persisted in the transaction record.

### **Obligation B — Detectability.**

Output of generative or autonomous AI must be marked as artificially generated in a manner that is machine-readable. For agentic payments, this is the cryptographically signed AI-actor tag bound to the transaction envelope.

### **Obligation C — Record-keeping.**

The disclosure-was-made-and-received fact must be retained in an audit-quality record. The record must be producible to a national competent authority on demand and survive vendor changes.

The penalty regime under the EU AI Act for transparency-obligation violations is administrative fines up to **€15 million or 3% of worldwide annual turnover**, whichever is higher (Article 99). Smaller in absolute terms than the Article 5 prohibited-practices fines, but the obligation is broad and the enforcement window opens 2026-08-02.

## Page 2 — PSD3 / PSR controls overlay

While Article 50 governs the AI-side disclosure, the payment-side controls live under PSD3 (the revised Payment Services Directive 3) and the PSR (Payment Services Regulation), with Official Journal

publication expected June–September 2026.

The agentic-flow specific obligations:

- **Strong Customer Authentication (SCA)** must extend to agent-initiated flows. The PSD2 exemption matrix needs reworking — agentic flows do not map cleanly onto "recurring transactions" or "low-value contactless."
- **Mandate scope enforcement** — the agent's authority to spend must be cryptographically bound. Out-of-scope action is fraud-liability-shifted to the deployer.
- **Recurring-mandate controls** — agentic subscriptions to merchants require explicit consent capture and revocation rails.
- **Dispute audit** — the consumer's right to dispute an agent-initiated charge requires a record of (a) mandate scope, (b) agent identity, (c) merchant acceptance, (d) the moment of execution.

mnr's Pillar 2 (PSD3/PSR Policy Enforcement) ships with each of these as a controls overlay above your chosen rail.

## Page 3 — The 14-point engineering checklist + design-partner CTA

Run this checklist against your current or planned agentic-payment deployment. If you score below 11/14 before the start of July, you are operationally exposed for August.

1. **Every agent transaction carries a verifiable AI-actor disclosure tag.** (Article 50, Obligation A) 2. **The tag is cryptographically signed by the agent's principal credential.** (Article 50, Obligation B) 3. **The signature uses a NIST-standardized post-quantum primitive (ML-DSA) or is on a documented migration path.** (CNSA 2.0 alignment) 4. **The transaction envelope persists the disclosure to an audit-quality log.** (Article 50, Obligation C) 5. **The audit log is append-only and externally verifiable.** (BaFin / EBA supervisory readiness) 6. **The audit log is exportable in machine-readable format to your data warehouse.** (BigQuery / Snowflake / Postgres) 7. **The agent's mandate scope is cryptographically bound to the principal's consent record.** (PSD3 mandate enforcement) 8. **Out-of-mandate transactions are denied at the policy layer, not refunded after the fact.** (PSD3 fraud-liability) 9. **SCA flows are re-evaluated for agentic edge cases.** (PSR / PSD3) 10. **Recurring agentic mandates have an explicit revocation rail and a tested revocation path.** (PSD3) 11. **Dispute records include mandate, agent identity, merchant acceptance, and execution timestamp.** (PSR) 12. **Human-in-the-loop fallback is documented and tested for at least one transaction class.** (NSPM-11 alignment if you also touch US federal flows) 13. **GDPR data residency for transaction logs is documented and enforced.** (eu-central-1 or equivalent) 14. **A named individual is responsible for Article 50 compliance posture and reports to the board or equivalent.** (Governance line)

If your team has fewer than 11 of these in production by 2026-07-15, request a pilot conversation with mnr.

**Pilot structure:** €5,000 / month, 90 days, white-glove, direct founder access (TOHID NAEEM). Three EU pilots open for Q3 2026.

To engage: request a pilot at [mnr.app](https://mnr.app) or write directly to [design-partners@mnr.app](mailto:design-partners@mnr.app).

---

**Authored by TOHID NAEEM, Founder, MNR LLC. 2026-06-08.**

**MNR LLC · Wyoming domestic · EIN 33-3678186 · Silicon Hills, CA**

**Decorated disabled veteran-owned. Article 27 EU representative on file.**