REGULATORY OVERLAP MAP

MAS MindForge vs the EU AI Act

Where the two rulebooks actually line up

If you run a Singapore financial institution with any reach into the EU, you're holding two rulebooks that ask a surprising number of the same questions in different accents. One is guidance built by 24 banks, insurers and capital markets firms with their regulator. The other is law, with fines and market access attached. Here is where they overlap, and where the gaps are the kind that only show up when someone actually asks for the document.

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THE TWO FRAMEWORKS

What each one is, quickly

Different instruments, different consequences. But look at what each one is actually asking you to produce, and the shape gets familiar fast.

GUIDANCE

Project MindForge

Started in June 2023 as an MAS-led industry collaboration. Phase 1 delivered a whitepaper on generative AI risk in May 2024. Phase 2 widened the scope to traditional, generative and agentic AI, landing as a three part handbook: an Executive Handbook (November 2025, 17 Considerations for senior leadership), an Operationalisation Handbook (January 2026), and Implementation Examples from the 24 consortium members. MindForge isn't law. It's guidance built to make MAS's own proposed AI risk management guidelines usable.

LAW

The EU AI Act

Regulation 2024/1689. The technical documentation duty in Article 11 and the rest of the Chapter III high-risk requirements became applicable on 2 August 2026. A high-risk system under Annex III needs a technical dossier under Annex IV, and depending on the system, a Notified Body may need to certify it before you can put a CE mark on anything. Miss it and you aren't fined for bad governance, you're blocked from the market.

> Same underlying question, asked in a different accent: who is accountable, what do you test before shipping, and how do you prove any of it later.

THE OVERLAP, MAPPED

Where the two frameworks ask the same question

Section by section, here is the overlap, and the framework language each side uses to ask for it.

WHAT IT'S REALLY ASKING FOR	MINDFORGE (17 CONSIDERATIONS)	EU AI ACT
Someone accountable at the top	Consideration 1: board and senior management accountability for AI oversight	Article 17: quality management system with a documented accountability structure
Written policies defining AI, roles, process	Consideration 2: AI-related policies, procedures and standards	Article 17 again, plus the governance narrative expected in the technical documentation
AI folded into enterprise risk management	Consideration 3: AI risk integrated into the risk appetite framework	Article 9: risk management system, run continuously across the lifecycle
A live inventory of the AI you're running	Consideration 6: AI inventory capabilities	Annex IV §1: general description of the system; Article 71's EU database registration for Annex III systems
Vendor and third-party AI risk	Consideration 4: procurement and vendor assessment; Consideration 10: onboarding risk from third-party AI	Annex IV 2(a): how third-party tools were used or modified; Article 25 on responsibility along the value chain
Data governance for training and use	Considerations 8 and 9: data compatibility with standards and appropriate data management	Article 10: data and data governance; Annex IV 2(d): datasheets, provenance, cleaning methodology
Pre-deployment testing	Consideration 12: thorough testing and review before deployment	Article 9(6) to 9(8): testing against pre-defined metrics; Annex IV 2(g): test logs and reports
Guardrails and performance metrics	Consideration 11: appropriate guardrails and relevant metrics	Annex IV §4: whether performance metrics fit the specific system
Ongoing monitoring after launch	Consideration 14: ongoing monitoring to keep the system fit for purpose	Article 72: post-market monitoring system and plan, folded into the Annex IV dossier
Change management	Consideration 15: capturing changes with traceability	Annex IV §6: lifecycle changes; under Annex VII, a compliance-affecting change goes back to the Notified Body
People and culture	Consideration 16: equipping staff with AI governance skills	Not a standalone Annex IV clause, but implicit in Article 17's competence requirements

The good news: if you've already built a MindForge-aligned program, you aren't starting from zero. Considerations 1, 2, 3, 6, 8, 9, 11, 12, 14 and 15 cover roughly two thirds of what Annex IV wants to see. Most compliance teams assume a new jurisdiction means starting the paperwork over. It doesn't have to.

WHERE IT BREAKS DOWN

Where they genuinely diverge

The overlap is real, but it thins out in three places. Each one is the kind of gap that only shows up when someone asks for the actual document.

01 Scope

MindForge is built for financial institutions in Singapore: banks, insurers, capital markets firms. The EU AI Act's high-risk categories run much wider, covering employment, credit scoring, insurance pricing, biometric identification, critical infrastructure, law enforcement, education and migration. If your AI touches HR decisions or biometric verification anywhere in the EU, MindForge simply has nothing to say about it. It was never meant to.

02 Certification

This is the big one. Nothing in MindForge produces a certificate, it's a maturity framework, self-assessed against 17 Considerations. The EU AI Act, for systems that require it, routes through a Notified Body under Annex VII, which examines your quality management system and technical documentation independently, can demand further testing, can ask for training data and even trained model parameters as a last resort, and can refuse to certify you. A strong MindForge program gives you excellent internal evidence. It does not give you a Union technical documentation assessment certificate, and nothing in your Singapore governance stack substitutes for one.

03 The single dossier

Annex IV asks for one specific, enumerated document: nine sections, tied to Article 11(1), retained for ten years, matched to the exact system version under review. MindForge's 17 Considerations live across an executive handbook, an operationalisation handbook and case study appendices. That's good practice for building a governance culture. It isn't the same as having a document you can hand a Notified Body and say, here it is. Firms that have done MindForge well sometimes assume the paperwork is done. It isn't, not for Article 11 purposes, until someone has actually assembled the Annex IV shaped version of it.

THE PRACTICAL MOVE

If you're sitting under both

If you're a MAS-regulated institution with any EU exposure, or an EU firm expanding into Singapore, the practical move isn't to run two separate compliance programs. Treat MindForge's 17 Considerations as your operating model, and Annex IV as the specific document format you output for any system that needs it. The underlying controls, risk management, data governance, testing, monitoring, change tracking, are close enough that duplicating the work is mostly wasted effort. The dossier, the certification path and the ten year retention clock are not close enough to skip.

Keep one set of evidence, not two

AgenticAssure's free Discovery tier inventories every AI system, agent and MCP server you run, and tests it against both MindForge-aligned controls and the EU AI Act's frameworks. No sales call required to see it.

See the platform

SOURCES

1. Project MindForge, Monetary Authority of Singapore
2. MAS Partners Industry to Develop AI Risk Management Toolkit for the Financial Sector
3. Singapore: MAS consortium releases comprehensive AI Risk Management Handbook, Linklaters
4. Project MindForge Phase 2: Singapore's AI governance push, Fintech Global
5. Annex IV: Technical Documentation Referred to in Article 11(1)
6. Annex VII: Conformity Based on Assessment of the Quality Management System and Technical Documentation
7. Article 9: Risk Management System
8. Article 72: Post-Market Monitoring by Providers

This mapping reflects publicly available descriptions of the MindForge Executive Handbook's 17 Considerations and the EU AI Act's Official Journal text as of August 2026. Check the full text of the MindForge handbooks and the MAS Guidelines on Artificial Intelligence Risk Management directly for implementation details. This is not legal advice.