

The Complaix™ Methodology Brief

Operational AI Governance for Enterprise

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Executive Summary

The Complaix™ Methodology is a five-framework operational system that takes an organisation from zero AI visibility to full accountability maturity. It is designed for enterprises that use AI in their operations and need to demonstrate governance, accountability, and regulatory compliance — not as a theoretical exercise, but as a documented, auditable, operational reality.

The methodology is aligned to the EU AI Act (in force, high-risk obligations from 2 August 2026), ISO 42001:2023, ISO 27001:2022, and the FCA's AI governance guidance. Every framework produces a concrete, auditable output. The sequence is deliberate: you cannot govern what you cannot see, and you cannot measure maturity without first establishing accountability.

The Governance Problem

Organisations have adopted AI faster than governance has followed. The tools are in place. The accountability is not.

The four structural gaps that Complaix addresses:

1. No Visibility — Most organisations cannot produce a complete inventory of AI tools, models, and embedded features in use across their operations. Shadow AI — tools adopted by departments without central oversight — is the norm, not the exception. The average enterprise uses 14 or more AI tools, most without formal governance.

2. No Accountability — AI-influenced decisions lack clear human ownership. When a credit decision, hiring outcome, or customer interaction is challenged, organisations cannot demonstrate who was responsible for the AI-assisted outcome. The EU AI Act requires a named human accountable for every high-risk AI decision.

3. No Governance — AI usage is unstructured and undocumented. Audit trails do not exist. Regulatory compliance cannot be demonstrated because the operational layer — how AI is used, who approves its use, what happens when it goes wrong — has never been built.

4. No Risk Measurement — AI risk exposure is unmeasured. Organisations cannot prioritise, mitigate, or report on risks they cannot quantify. Boards and regulators are asking for AI risk disclosures that most organisations cannot produce.

The Five Frameworks

Framework 01 — AI Surface Mapping™

Purpose: Create a complete, verified inventory of every AI system in the organisation.

The problem it solves: You cannot govern what you cannot see. Most organisations have no single source of truth for AI deployment. Shadow AI — tools adopted without IT or Compliance oversight — creates invisible regulatory exposure.

What it produces: The AI Surface Registry — a structured catalogue of every AI tool, model, API, and embedded feature in use, including vendor, model, team, use case, data categories processed, and EU AI Act risk classification.

Regulatory alignment: EU AI Act Article 49 (registration obligations), Article 9 (risk management system), ISO 42001 Clause 6.1 (actions to address risks and opportunities).

Key activities:

- Structured discovery across all departments, including self-reporting mechanisms for shadow AI
- Vendor and model identification, including embedded AI in SaaS tools
- EU AI Act risk classification for each system (prohibited / high / limited / minimal)

- Ongoing monitoring for new AI adoption
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Framework 02 — Decision Accountability™

Purpose: Assign clear human ownership to every AI-influenced decision.

The problem it solves: The EU AI Act requires a named human accountable for every high-risk AI decision. Most organisations have no mechanism to assign, record, or verify this accountability. When decisions are challenged, no one can demonstrate who was responsible.

What it produces: The Decision Accountability Matrix — a structured record of every AI-influenced decision type, the human owner, the oversight method applied, and the sign-off trail.

Regulatory alignment: EU AI Act Article 14 (human oversight), Article 13 (transparency), ISO 42001 Clause 5.3 (organisational roles, responsibilities and authorities), FCA PS22/3 (model risk management).

Key activities:

- Mapping of AI-influenced decision types across operations
 - Assignment of named human owners to each decision type
 - Documentation of oversight methods (human review, dual approval, automated check)
 - Sign-off workflow implementation with audit trail
 - Appeal and challenge mechanism design
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Framework 03 — Operational AI Governance™

Purpose: Build the operational layer that connects AI tools to business outcomes.

The problem it solves: Governance frameworks exist on paper but not in practice. There is no documented process for how AI is used in each workflow, who approves its use, how outputs are verified, or what happens when something goes wrong.

What it produces: The Governance Playbook — a structured operational document covering AI policy, oversight procedures, incident response, escalation paths, and

board reporting protocols.

Regulatory alignment: EU AI Act Article 9 (risk management system), Article 17 (quality management system), ISO 42001 Clause 8 (operation), ISO 27001 Annex A.5 (information security policies).

Key activities:

- AI use policy development and approval
 - Workflow-level governance documentation
 - Incident response and escalation procedures
 - Board and executive reporting templates
 - Vendor and third-party AI governance protocols
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Framework 04 — AI Exposure Scoring™

Purpose: Quantify AI risk exposure across regulatory, operational, reputational, and data dimensions.

The problem it solves: AI risk is qualitative and unmeasured. Boards and regulators require quantified risk disclosures. Without a scoring model, organisations cannot prioritise mitigation, demonstrate risk management, or produce credible board-level AI risk reports.

What it produces: The AI Exposure Score — a single score out of 100 representing the organisation's aggregate AI risk exposure, with dimension-level breakdowns and prioritised mitigation recommendations.

Regulatory alignment: EU AI Act Article 9 (risk management), ISO 42001 Clause 6.1.2 (AI risk assessment), ISO 27001 Clause 6.1.2 (information security risk assessment), FCA PS22/3 (model risk tiering).

Key activities:

- Risk assessment across all registered AI systems
- Scoring across four dimensions: regulatory, operational, reputational, data
- Risk register population with likelihood, impact, and residual risk
- Board-ready AI risk report generation

- Ongoing monitoring and re-scoring triggers
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Framework 05 — Accountability Maturity™

Purpose: Benchmark governance maturity and provide a clear roadmap for progression.

The problem it solves: Organisations need to demonstrate a credible, improving governance position to regulators, auditors, and boards — not just a point-in-time snapshot. Without a maturity model, there is no way to measure progress or set governance targets.

What it produces: The Maturity Assessment — a five-level maturity score with dimension-level breakdowns (visibility, accountability, risk management, compliance evidence, governance) and a structured roadmap for advancement.

The five maturity levels:

Level	Label	Description
1	Aware	AI usage identified; no formal governance
2	Developing	Initial policies in place; accountability gaps remain
3	Defined	Governance documented; accountability assigned; risk measured
4	Managed	Governance embedded in operations; continuous monitoring active
5	Optimising	Audit-ready; continuous improvement; board-level AI governance

Regulatory alignment: EU AI Act Article 9 (continuous risk management), ISO 42001 Clause 10 (improvement), ISO 27001 Clause 9.3 (management review).

The Complaix OS Platform

The Complaix OS is the operational platform that implements the five frameworks. It provides:

- **AI Surface Registry** — live catalogue of all AI systems with EU AI Act risk classification
 - **Decision Log** — structured record of AI-influenced decisions with human ownership and sign-off trail
 - **Risk Register** — quantified risk exposure with likelihood, impact, and mitigation tracking
 - **Governance Playbook** — structured policy and procedure library with version control
 - **Maturity Dashboard** — live maturity score with dimension breakdowns and progression roadmap
 - **Compliance Tracker** — EU AI Act, ISO 42001, ISO 27001, and SOC 2 compliance mapping
 - **Shadow AI Reporting** — employee self-reporting mechanism with review workflow
 - **Vendor Assessment** — structured third-party AI vendor risk assessment
 - **Incident Register** — AI incident tracking with regulatory notification workflows
 - **Board Pack Generation** — automated board-ready AI governance reports
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Regulatory Alignment

The Complaix methodology maps directly to the following regulatory frameworks:

Framework	Jurisdiction	Status	Key Requirements
EU AI Act	European Union	In Force (high-risk: Aug 2026)	Risk management, human oversight, transparency, registration
ISO 42001:2023	Global	Published	AI management system standard
ISO 27001:2022	Global	Published	Information security management
FCA AI Guidance	United Kingdom	Active	Model risk management, explainability
OCC / CFPB	United States	Active	Model risk management, fair lending
NYC Local Law 144	New York City	In Force	Automated employment decision tools

Engagement Model

Foundation Engagement

A structured 8-week advisory programme that implements the five frameworks and onboards the organisation onto the Complaix OS platform. Includes governance advisory, AI surface mapping, decision accountability framework design, team training, and 90-day platform onboarding. Continues on a Foundation subscription.

Platform Subscription

Direct access to the Complaix OS platform for organisations that have completed the Foundation Engagement or have existing governance foundations. Available on Foundation, Operational, and Enterprise tiers with monthly or annual billing.

Enterprise

Custom engagement for large enterprises requiring multi-entity governance, bespoke framework implementation, dedicated advisory support, and custom regulatory mapping.

Next Steps

1. **Take the Free AI Accountability Assessment** — 25 questions, 8 minutes. Receive your AI Exposure Score and a prioritised gap analysis. Available at www.complaix.io/assessment.
 2. **Book a Discovery Call** — A 30-minute structured conversation to understand your current governance position and identify the right engagement path.
 3. **Foundation Engagement** — Begin the structured 8-week programme to implement the five frameworks and establish your governance infrastructure before the August 2026 deadline.
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About Complaix

Complaix is an AI governance platform and advisory firm. We build the operational infrastructure that turns regulatory requirements into auditable practice. Our methodology is grounded in published regulatory text — not proprietary frameworks invented in isolation — and is reviewed against regulatory updates as they are published.

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