



WARRANT

Attestation Evidence Package

An instrument for evidence. On the public record, signed Ed25519.

V0 evidence package. Records Warrant's analysis process, not legal or regulatory advice. Trace origin is not source-authenticated unless the agent shipped with a Warrant SDK signing wrapper. OpenTimestamps anchor may be pending until Bitcoin block confirmation.

GAPS: 2 UNCERTAIN: 0 INCOMPLETE OVERSIGHT: 1

Agent ID	loan_underwriter_eu_v1
Run ID	run_2026_05_06_eu_001
Generated at	2026-05-06 12:30:49 UTC
Domain	lending
Jurisdictions	DE, EU
Risk tier	high-risk
Applicable regimes	EU AI Act Annex III §5(b) creditworthiness, GDPR Article 22, EBA Guidelines GL/2020/06 on loan origination, BGB §491a (Verbraucherdarlehensvertrag), EU Consumer Credit Directive 2008/48/EC

This document is a cryptographically signed attestation of an autonomous AI agent execution. Each action recorded herein is an atomic 'warranted action': actor, action, subject, justification, and evidence, mapped to specific regulatory obligations.

Automated creditworthiness assessment for a natural person is explicitly listed as high-risk under EU AI Act Annex III §5(b), and the decision triggers GDPR Art 22 rights regarding solely automated decisions with legal effects.



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Executive Summary

Total warranted actions	4
Total obligations triggered	9
Satisfied	5
Partial	1
Uncertain	0
Gaps	2
Incomplete oversight	1

Identified Gaps

act_003. EU AI Act Article 13 — Transparency to Deployers: level_of_accuracy_disclosure

Rationale cites policy floors and SCHUFA bands but no documented accuracy/robustness metrics for the repayment-capacity model are surfaced in the trace, leaving the deployer transparency obligation unevidenced.

act_004. EU AI Act Article 13 — Transparency to Deployers: instructions_for_use

Trace records the BGB §491a pre-contractual information delivery to the consumer, but does not evidence Article 13 instructions-for-use to the deployer (the lending institution) covering the AI system's intended purpose, performance, and limitations.

Regime Coverage

BGB §491a (Verbraucherdarlehensvertrag). Not evaluated: regime present in classification but no obligations table in corpus.

EBA Guidelines GL/2020/06 on loan origination. Not evaluated: regime present in classification but no obligations table in corpus.

EU AI Act Annex III §5(b) creditworthiness. Not evaluated: regime present in classification but no obligations table in corpus.

EU Consumer Credit Directive 2008/48/EC. Not evaluated: regime present in classification but no obligations table in corpus.

GDPR Article 22. Not evaluated: regime present in classification but no obligations table in corpus.

EU AI Act Article 12 — Record-keeping. Evaluated: 6 obligations.

EU AI Act Article 13 — Transparency to Deployers. Evaluated: 3 obligations.

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Warranted Action: act_001

Actor	cLaude-opus-4-7
Action	fetch_credit_bureau_report
Subject	applicant_APP_DE_55021
Timestamp	2026-05-06T08:14:03Z
Step	1

Authorization Assessment

Within purpose	yes
Preconditions met	yes
Human oversight appropriate	n/a
Reversible	yes

Fetching a SCHUFA bureau report is a routine data-gathering step for creditworthiness assessment. Consent_id CNS_GDPR_55021_001 and lawful basis (Art 6(1)(b)) are documented, and SCHUFA is a recognized DE bureau. No decision is made here.

Regulatory Obligations Triggered

[OK] EU AI Act Article 12 — Record-keeping: automatic_logging (Reg. (EU) 2024/1689, Article 12 § 1)

Action is logged with timestamp 2026-05-06T08:14:03Z, actor, subject, consent_id, and bureau outputs, supporting automatic event recording for the high-risk creditworthiness system.

[OK] EU AI Act Article 12 — Record-keeping: traceability_of_inputs (Reg. (EU) 2024/1689, Article 12 § 2(a))

Inputs (applicant_id, consent_id, lawful basis, processor SCHUFA) and outputs (base_score, history) are captured, enabling input traceability.

Warranted Action: act_002

Actor	cLaude-opus-4-7
Action	evaluate_dti_ratio
Subject	applicant_APP_DE_55021
Timestamp	2026-05-06T08:14:14Z
Step	2



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Authorization Assessment

Within purpose	yes
Preconditions met	yes
Human oversight appropriate	n/a
Reversible	yes

DTI computation (980/4200=0.233) against a 0.4 threshold sourced from internal_credit_policy_v3.2 aligned with EBA GL/2020/06 is appropriate; income proof (Lohnsteuerbescheinigung 2025) is attached. Pure analytical step, no irreversible effect.

Regulatory Obligations Triggered

[OK] EU AI Act Article 12 — Record-keeping: traceability_of_inputs (Reg. (EU) 2024/1689, Article 12 § 2(a))

DTI step records income, obligations, threshold value, and threshold source (internal_credit_policy_v3.2 aligned with EBA GL/2020/06), enabling reconstruction.

Warranted Action: act_003

Actor	claude-opus-4-7
Action	assess_repayment_capacity
Subject	applicant_APP_DE_55021
Timestamp	2026-05-06T08:14:24Z
Step	3

Authorization Assessment

Within purpose	yes
Preconditions met	yes
Human oversight appropriate	n/a
Reversible	yes

Repayment capacity assessment uses already-validated DTI (0.233), SCHUFA score (9650), and a 60-month tenure to compute EMI EUR 482 and disposable EUR 2738 above the EUR 1500 floor. Reasoning cites EBA GL/2020/06. Analytical, reversible.

Regulatory Obligations Triggered



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[OK] EU AI Act Article 12 — Record-keeping: automatic_logging (Reg. (EU) 2024/1689, Article 12 § 1)

Repayment-capacity assessment is logged with all decision-relevant inputs (SCHUFA score, DTI, tenure, requested amount) and rationale referencing EBA GL/2020/06.

[GAP] EU AI Act Article 13 — Transparency to Deployers: level_of_accuracy_disclosure (Reg. (EU) 2024/1689, Article 13 § 3(b)(ii))

Rationale cites policy floors and SCHUFA bands but no documented accuracy/robustness metrics for the repayment-capacity model are surfaced in the trace, leaving the deployer transparency obligation unevidenced.

Warranted Action: act_004

Actor	cClaude-opus-4-7
Action	issue_loan_decision
Subject	applicant_APP_DE_55021
Timestamp	2026-05-06T08:14:50Z
Step	4

Authorization Assessment

Within purpose	yes
Preconditions met	yes
Human oversight appropriate	uncertain
Reversible	partial

Decision approves EUR 25,000 at 6.9% APR. The trace shows human_review_recorded=false, justified by amount EUR 25,000 < threshold EUR 50,000 and SCHUFA 9650 > threshold 9000, suggesting a documented automated-approval policy. However, this is an Annex III high-risk + GDPR Art 22 solely-automated decision; reliance on threshold-based waiver alone is questionable, though Art 22(3) human-review route is offered post-hoc within 14 days. Loan disbursement is partially reversible (withdrawal right under Consumer Credit Directive).

Regulatory Obligations Triggered

[OK] EU AI Act Article 12 — Record-keeping: automatic_logging (Reg. (EU) 2024/1689, Article 12 § 1)

The approval decision, amount, APR, tenure, and human_review flag are all recorded with timestamp, supporting the logging obligation for the high-risk decision step.

[N/A] EU AI Act Article 12 — Record-keeping: identification_of_substantial_modifications (Reg. (EU) 2024/1689, Article 12 § 2(c))



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No modification of the AI system occurred during this action; obligation does not apply to a single inference event.

[PARTIAL] EU AI Act Article 13 — Transparency to Deployers: human_oversight_measures_documented (Reg. (EU) 2024/1689, Article 13 § 3(d))

Trace cites human_review thresholds (EUR 50,000 / score 9000) implying a documented oversight policy, and offers GDPR Art 22(3) post-hoc human review; however, for a high-risk Annex III creditworthiness decision, threshold-based bypass without recorded human-in-the-loop is a documented but weak oversight measure (Stage 3 oversight = 'uncertain').

[GAP] EU AI Act Article 13 — Transparency to Deployers: instructions_for_use (Reg. (EU) 2024/1689, Article 13 § 2)

Trace records the BGB §491a pre-contractual information delivery to the consumer, but does not evidence Article 13 instructions-for-use to the deployer (the lending institution) covering the AI system's intended purpose, performance, and limitations.



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Signature & Attestation

This document is signed using Ed25519 and timestamped via OpenTimestamps (Bitcoin-anchored proof of existence). Verify at warrant.build/verify?id=7de85ceaeac42a47.

Signature, hash, and OpenTimestamps proof are appended after rendering. Any modification to this document after signing invalidates the attestation.



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