

# CCC: assurance has not caught up with scale.

The first global RATE AI band is most useful as a decision signal. The field has moved beyond experimentation, while evidence and governance remain uneven enough that leaders should ask what is still reversible before the next wave of scale.

| CCC                    | 202                                                                                                                                                                                                                             | A RANGE            | CHOICE                    |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|---------------------------|
| global public position | systems assessed                                                                                                                                                                                                                | already observable | the variable that matters |
| AAA / AA / A           | <b>You own the pace.</b><br>Governable expansion. Scale with normal discipline; keep evidence current and preserve the ability to pause. Strong bands mean decision freedom remains internally anchored, not that risk is zero. |                    |                           |
| BBB / BB / B           | <b>The window is open.</b><br>Compression. Growth can continue, but evidence, ownership or exposure gaps deserve active closure before the next market, model or procurement change makes them more expensive.                  |                    |                           |
| CCC / CC / C           | <b>Executive decision zone.</b><br>Intervention before constraint. Decide what needs evidence, redesign, ring-fencing or deceleration while the organisation still owns the remedy and the narrative.                           |                    |                           |
| DDD / DD / D           | <b>Continuity is at stake.</b><br>Structural constraint. Priorities shift toward containment, preservation of evidence and protection of the wider portfolio as options narrow.                                                 |                    |                           |

## What CCC means

CCC is not a verdict that AI is unsafe and it is not a finding of non-compliance. It indicates an executive decision zone: routine monitoring is no longer enough as a default assumption. Leaders should identify what still needs evidence, redesign, ring-fencing or a clearer owner while those choices remain internal.

## Why the timing matters

In 2025, 20% of EU enterprises used AI and 55% of large enterprises did. In EU banking, the EBA observed 92% of banks already deploying AI. When adoption becomes operational, an assurance gap stops being an administrative issue and becomes a scaling, procurement, market-entry and defensibility issue.

## The evidence premium

Forty of the first 202 rated systems reach at least 90% verifiable transparency. This is an observed first-cohort pattern, not a causal claim. Its strategic meaning is that independent assurance becomes more decisive when the evidence trail can survive external reconstruction.

## The board question

If challenged tomorrow, can the organisation show what it knew, who owned the decision, what alternatives were considered and whether it could still pause or redesign the system?

Official context: **Eurostat** | **European Banking Authority** | **OECD AI Principles**

Technical note: RATE AI ratings are independent risk-intelligence positions, not legal opinions or certificates of regulatory compliance. Detailed scoring and evidence rules are published separately in the Public White Paper v1.1.