

# Small Mid-Cap Relief in the EU AI Act: What the New Category Means for Swiss SMEs

## MANAGEMENT SUMMARY & CORE TAKEAWAY

The Digital Omnibus to the EU AI Act introduces the 'Small Mid-Cap' category: companies with up to 750 employees and maximum €150 million revenue receive simplified documentation requirements, proportionate quality standards, free sandbox access and reduced penalty caps. For scaling Swiss SMEs, this means the leap beyond 250 employees no longer becomes a compliance trap. Instead of drowning in admin costs when growing, larger mid-market firms stay agile—if they use the relief measures strategically.

## CONTEXT & EXECUTIVE RELEVANCE

Until now, the EU AI Act recognised only the standard SME definition: under 250 employees, maximum €50 million revenue or €43 million balance sheet. Above that, you were treated as a large enterprise—with full obligations. For many Swiss industrial firms, medtech companies or precision suppliers in the 250–750 employee range, this was absurd: technically mid-market, regulatorily corporate.

The Digital Omnibus fixes this design flaw. Since the final text was published on 30 July 2026, companies with fewer than 750 employees and revenue up to €150 million (or balance sheet up to €129 million) are recognised as Small Mid-Caps. They receive tailored relief—without being exempted from high-risk governance.

CORE ACTION ITEMS

- 01 Simplified technical documentation: the Commission provides pre-defined templates that notified bodies must accept. You don't start from scratch.
- 02 Proportionate quality systems: instead of full ISO 9001-style governance, risk-based, scaled processes suffice—tailored to your company size.
- 03 Priority access to regulatory sandboxes: you can test high-risk AI under supervision before going live—free of charge under Article 58 of the AI Act.
- 04 Reduced penalty caps: maximum fines are adjusted proportionately. Instead of blanket penalties up to €15 million or 3% of global revenue for high-risk violations, Small Mid-Caps face lower ceilings.

SWISS COMPLIANCE & ARCHITECTURE GUIDELINES

- ☑ Full compliance with revised Swiss Data Protection Act (revDSG).
- ☑ Zero vendor lock-in on closed proprietary models.
- ☑ Seamless integration into Abacus, Bexio and M365 ecosystems.

Non-Binding Process Analysis

Let us review in 20 minutes where AI agents create immediate measurable efficiency in your workflows.

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