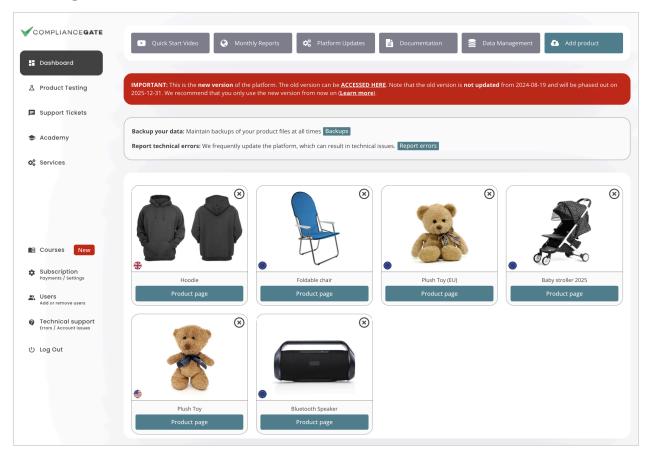
# **Compliance Gate Platform Feature Overview**



This document explains the use case, data sources, limitations, and risks of the following Compliance Gate Platform features:

- Compliance Requirements Lists
- Document templates
- Label creator
- Lab testing
- Support tickets
- Monthly Reports / Updates



# **Compliance Requirements Lists (CRL)**



**Step 1:** Select country/market

**Step 2:** Select product modules

**Step 3:** Set specifications

**Step 4:** List created

## What is a Compliance Requirements List?

- 1. Compliance Requirements Lists (CRL) are created based on the following user inputs:
  - Market
  - Module/s
  - Specifications and parameters
- 2. By creating a requirements list, you can find relevant product regulations and other requirements.
- 3. Each Compliance Requirements List (CRL) contains Compliance Requirements List (CRL) entries.

# Which regulations, directives, and other requirements are covered?

The Compliance Requirements List database only cover US, EU and UK regulations listed in these documents:

- US Database
- EU Database
- UK Database



#### What is a CRL entry?

1. Each CRL entry contains a brief overview of a certain regulation, directive, document, or other compliance topic. It may, for example, include references to the following areas:

- Product scope
- Exemptions
- Definitions
- General requirements
- Substance restrictions
- Documentation (if any)
- Labelling (if any)
- Lab testing
- Sources
- 2. CRL entries serves the following purposes:
  - It provides the user with a general overview of requirements
  - It can help you navigate through relevant articles/annexes/regulations/parts (e.g., labelling and documentation requirements)
  - It serves as a first introduction to a certain regulation, directive, document, or other compliance topic
  - It guides the user to relevant legislation, guidance pages, and other sources
- 3. A CRL entry does not contain the entire legislation, guidance document or other source. As such, it does not contain all requirements or details found in the relevant source.

# How do you create CRL entries?

- 1. We take the following steps when writing a CRL entry:
  - Select the regulatory text and/or other sources (e.g., guidance page)
  - We analyse the text to identify parts we deem relevant (e.g., labelling requirements)\*
  - We list selected articles/annexes/regulations/parts in the CRL entry\*
- 2. The format of each CRL entry depends on the type of regulation or other requirement it covers. We also have different templates that are applied depending on the complexity of the source text/s. Further, the format is continuously updated. For all these reasons, the structure of the CRL entries differs.



<sup>\*</sup>We generally only list requirements for manufacturers and/or other entities that must actively manage the compliance process. We do not list requirements relevant for government bodies, third-party service providers (e.g., notified/approved bodies), marketplaces, fulfilment centres, and other entities.

#### How should we use CRL entries?

- 1. A CRL entry provides a general overview or index. It serves as a first introduction to a certain regulation, directive, document, or other compliance requirement.
- 2. You can access the primary source by clicking on the blue button below the introduction, or follow the links in the source footer. Ensure that you select the latest version of the relevant legislation, guidance pages or other sources.
- 3. You must ultimately take action based on the requirements in the latest version of the relevant legislation, guidance pages or other sources. You should not take action based on the CRL entry alone as it does not contain all requirements of the source/s.

#### **Sources and versions**

- 1. Each CRL entry is based on legislation texts and/or official guidance pages/documents.
- 2. We primarily use data from the following sources:
  - europa.eu
  - EUR Lex
  - eCFR
  - US government agency websites (e.g., CPSC, FCC, FDA, DOE, FTC, and USDA)
  - gov.uk
  - legislation.gov.uk
- 3. Each CRL entry is based on the source version available at the time of writing.
- 4. You can find information about the CRL entry versions, monitored sources, and how we manage updates in the following documents:
  - US Database
  - EU Database
  - UK Database

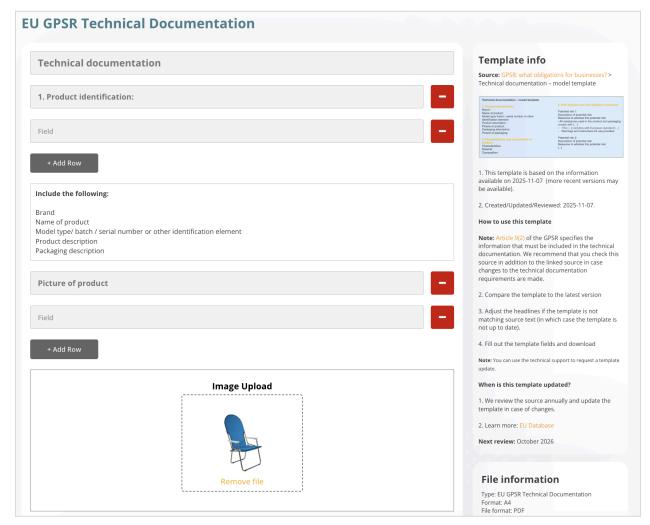
- 1. The platform may not cover **every single regulation** that can apply to a certain product.
- 2. The CRL entries do not contain the entire legislation source text. Hence, they **do not cover every requirement**, scenario, or piece of information present in the source text.
- The latest version of the relevant legislation, guidance page or other source is always the most authoritative source text.
- 3. There can be **errors** in the entries/summaries.
- 4. A **newer version** of the source that the CRL entry is based on may exist. In such scenarios, the CRL entry is based on an outdated version.



- You can access the primary source by clicking on the blue button below the introduction, or follow the link in the source footer. When doing so, ensure that you select the latest version of the relevant legislation, guidance page or other source.
- 5. The **linked sources** may be outdated, or the URL may have been redirected to another page.
- The latest version of the relevant legislation, guidance page or other source is always the most authoritative source text.
- 6. CRL entries generally do not contain information from **product standards**, **delegated acts**, **implementing acts**, or similar legislative instruments related to the covered regulations or directives.
- We do not include requirements and graphics (e.g., warning texts) available in standards that may be harmonised or referenced by a certain regulation. For example, the CRL entry for CPSIA does not include information from ASTM F963-23. It is often necessary to purchase and read standards.
- You are, for example, required to check the register of delegated acts and implementing acts, and guidance documents that may list such information.
- 7. The platform generally only covers **US federal** requirements, **EU regulations and directives**, and **UK regulations**.
- EU national or US state-level requirements, including case law, are generally not covered or monitored.
- 8. Some CRL entries refer to certain **economic operators**, such as manufacturers and importers. The requirements can differ depending on the type of economic operator.
- a. Each CRL entry generally only covers requirements relevant to **manufacturers** or other entities responsible for actively managing the compliance process. We do not list requirements relevant for government bodies, third-party service providers (e.g., notified/approved bodies), marketplaces, fulfilment centres, and other entities.
- b. You must check the definitions and relevant articles/regulations/parts in the latest version of the relevant legislation, guidance page or other source to determine the role and obligations of your company.
- 9. **Technical errors** can result in information not appearing correctly in the Compliance Requirements List or individual CRL entries (either in the application or the downloaded PDF).



# **Document Templates**



### What is a document template?

- 1. Certain regulations mandate the creation of declarations, certificates, technical documentation and other documents. Such documents can be requested by national authorities and marketplaces, such as Amazon.
- 2. The document templates are based on legislation and/or official guidance documents.



### Which templates are included?

You can find a list of US, EU and UK template (and the data and versions these are based on) in these documents:

- US Database
- EU Database
- UK Database

## How do you create document templates?

- 1. We base document templates on what is written in legislation and/or guidance documents.
- 2. For example, the EU Declaration of Conformity is based on the EMC Directive 2014/30/EU > ANNEX IV.

# How should we use document templates?

- 1. Start by selecting a document template relevant to your product.
- 2. You must carefully read the instructions in the right sidebar and follow these guidelines:
  - You may need to make edits to the document template headlines before adding information.
  - Open the source link and select the latest version of the relevant legislation, guidance page or other source
  - Ensure that you fill in a template based on the latest available version of the source/s

**Note:** The templates are only updated during an annual audit in October. As such, the templates may be outdated if the source (legislation or guidance document) is updated after the annual audit. It is therefore important to check the latest source version.

- 3. Add information to the fields and upload image files (when necessary). Note that some documents can only be issued if there is other supporting documentation, such as test reports.
- 4. Download a PDF copy of the document after completion and ensure that you maintain backups at all times.

**Note:** Certain regulations require that documents be maintained for a certain period of time (e.g., 10 years after you have placed a product on the market). Further, some documents must also be printed and signed.



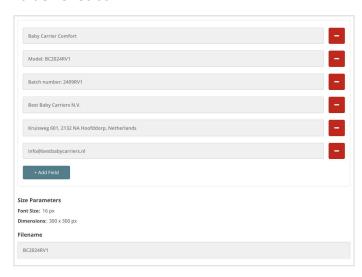
#### **Sources and versions**

- 1. Each document template is based on legislation texts and/or official guidance pages/documents.
- 2. We primarily use data from the following sources:
  - europa.eu
  - EUR Lex
  - eCFR
  - US government agency websites (e.g., CPSC, FCC, FDA, DOE, FTC, and USDA)
  - gov.uk
  - legislation.gov.uk
- 3. Each document template entry is based on the source version available at the time of writing.
- 4. You can find information about the document template versions, sources, and how we manage updates in the following documents:
  - US Database
  - EU Database
  - UK Database

- 1. We do not claim to provide templates for all document/certificate requirements in the US, EU, or UK.
- 2. We do not claim to provide templates for all documents/certificates that can apply to a certain product
- 3. **A newer version** of the legislation and/or guidance page the template is based on may exist. As such, the template may be outdated.
- Open the source link and select the latest version of the relevant legislation, guidance page or other source. Ensure that you fill in a template based on the latest available version of the source/s.
- 4. **Technical errors** can result in information not appearing correctly in the template (e.g., missing fields or fields shown in the wrong order).
- 5. **Technical errors** when saving the template or downloading a file could result in missing or incorrectly presented information in the file.
- Always check the downloaded file and compare it to the latest source version.
- 7. The templates do not cover information that is part of **product standards**.
- 8. Regulations can sometimes be open-ended in the sense that they leave certain decisions to the manufacturer, importer or other entities. For example, the exact wording of warning texts or batch number formats is often **not defined** and therefore not part of the templates.



# **Label Creator**



### What is the label creator

- 1. The label creator allows you to create product and packaging label files.
- 2. The files can be downloaded in .svg format.
- 3. We recommend that you book a third-party **label review** before affixing label information on the product, packaging, or documentation.

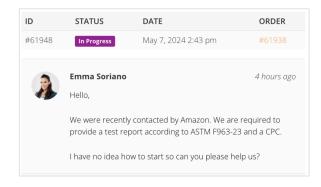
#### **Limitations and risks**

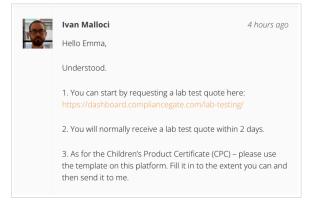
#### Limitations and risk description

- 1. **Technical errors** can result in information not appearing correctly in the template (e.g., missing fields or fields shown in the wrong order).
- 2. **Technical errors** when saving the label or downloading a file could result in missing or incorrectly presented information in the file.
- You must always check the file after downloading to ensure that no information is missing.



# **Support Tickets**



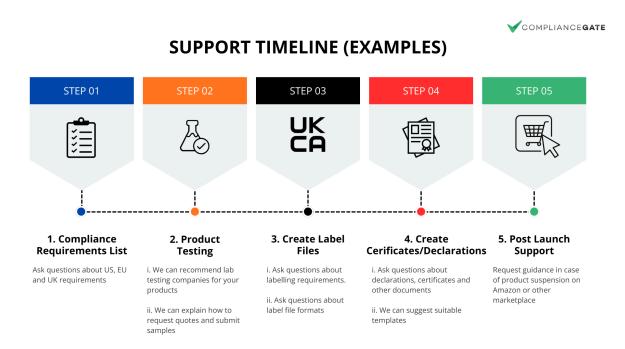


# What is a support ticket?

Support tickets allow you to ask questions about US, EU and UK product compliance requirements directly to our support team. We are available from Monday to Friday.

- You can submit a support ticket listing up to 5 questions.
- Each support ticket can only be dedicated to a single product and market.
- We can generally only provide support related to requirements in the CRL database

## How can I use support tickets?





#### **Sources and versions**

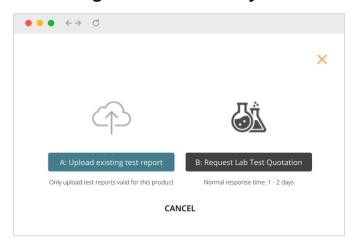
1. We can only respond based on what is written in regulation texts, guidance pages, and other official sources. Here are some examples of sources we use:

- europa.eu
- EUR Lex
- eCFR
- US government agency websites (e.g., CPSC, FCC, FDA, DOE, FTC, and USDA)
- gov.uk
- legislation.gov.uk
- 2. This also means that we can only address questions to the extent that these are addressed in the regulation texts, guidance pages, and other official sources. Bear in mind that the sources do not address every possible scenario or question.
- 3. Note that we can also provide guidance based on our own experience. However, this is limited to practical aspects of the process (e.g., how to submit samples to testing companies).

- 1. We can only relay information as it is **written in source texts**, and provide general guidance.
- This means that we can only refer to what is written in a certain source text. If your question is not answered or even addressed in the source text, then we can generally not provide an answer either.
- 2. When we search source texts, we cannot guarantee that we have **found everything** that relates to the question or objective.
- 3. We do not provide **legal advice**, interpretations, engineering/technical advice, or confirm applicable regulations or standards for specific products.
- 4. We cannot **"confirm" or "approve"** a product as "fully compliant" or compliant with a certain set of requirements.
- 5. We cannot guarantee that any answer we provide via support **covers every single possible** scenario or outcome.
- 6. We do not 'approve' or 'confirm' labels, documents, certificates, test reports, or other files including those created using the Compliance Gate Platform.
- 7. We do not provide **label reviews**.
- 8. We do not **actively manage** the process on our subscribers' behalf. For example, we do not create label files, documents, or communicate with marketplaces or other entities on their behalf.



# **Lab Testing / Other Third-Party Services**



# **Third-party services**

- 1. You can request service quotations from lab testing companies and other third-party service providers via the Compliance Gate Platform.
- 2. For lab testing, we mainly refer our subscribers to QIMA and TUV Rheinland are accredited\* by multiple entities:
  - QIMA Accreditations
  - TUV Rheinland Accreditations

- 3. These companies can often help you **suggest** relevant testing requirements and standards for certain products.
- 4. The terms of service of the service provider apply. We do not provide any warranties or guarantees concerning the provided services. Further, we do not actively monitor the communication between our users and the relevant third parties. You must submit a support ticket if you need our input.



<sup>\*</sup>The specific accreditations can vary between branches and labs operated by the companies.

- 1. We cannot guarantee that the testing companies have the capability to **test according** to all regulations or standards that may apply to a certain product.
- 2. We do not guarantee that third-party service providers can always provide an **accurate assessment** of the applicable standards or other testing requirements.
- 3. The **terms of service** of the third party apply to all transactions between your company and them.
- 4. We do not offer any **warranties or guarantees** for any services provided by third parties.



# **Source Monitoring**

# What sources do you monitor?

- 1. We monitor regulation texts in the US, EU and UK to keep track of new versions of regulatory requirements covered by the CRL database.
- 2. You can learn more about monitored sources and our methodology here:
  - US Database
  - EU Database
  - UK Database
- 3. We send a report each month summarising our findings and specify if we deem it necessary to update CRL entries.
- 4. We also monitor news and announcements concerning new regulations and compliance requirements (not already covered by the CRL database).

- 1. We only monitor regulations and updates as these are published in legislation databases (e.g., EUR Lex and eCFR). It is possible that we may report on such changes after they have entered into force and/or apply.
- 2. We only review the **sources listed** in the US / EU / UK Databases.
- 3. Some CRL entries are not based on sources that we **actively monitor**. We normally specify which CRL entries are not monitored.
- 4. We only review the **sources listed** in the US / EU / UK Databases.
- 5. We do not guarantee that we 'catch' every single new or updated compliance requirement.
- 6. We do **not update CRL entries** or other platform features in real-time. There is always a delay from the announcement to implementation on the platform.
- 7. Updates to CRL entries are listed in the US / EU / UK Databases. We do not notify users concerning updates that may affect their specific products or CRLs. Further, Compliance Requirements Lists (including their CRL entries) already created by customers are not updated when we make updates to the databases.
- Each Compliance Requirements List contains the CRL versions available in the database at the time of its creation.
- We send a monthly report that provides information about new and updated regulations, plus planned Compliance Gate Platform updates. Please review the monthly report to keep track of the updates. This can help you determine if new or updated requirements may apply to your product.

