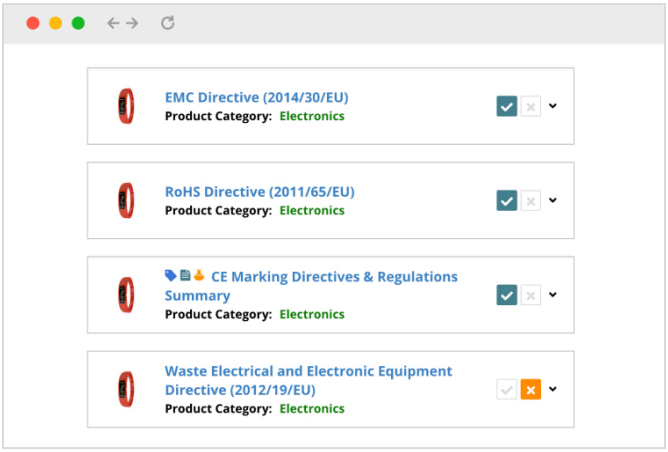
Last updated: 2025-04-16

Compliance Gate Platform Risk Disclosure

This document explains the features of the Compliance Gate Platform, and their limitations and risks.

This guide explains how the features of the Compliance Gate Platform were created. We also explain the limitations and risks of each feature.

Compliance Requirements Lists



Feature information

+ Compliance Requirements Lists are **automatically generated** based on user inputs and contain summaries of regulations and other requirements.

+ Compliance Requirements Lists serve as a **first step** toward researching relevant requirements for a product.

+ The **summaries** based on public information that can help you understand many of the key requirements.

+ The purpose of the **summary** is to give the user a general overview of the requirements.

+ We provide links to the **official sources** that the summaries are based on. We recommend that you always check and take action based on official sources.

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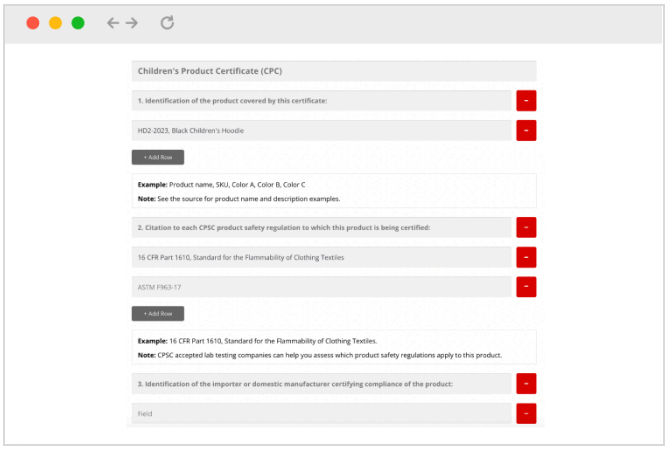
Limitations and risks

Limitation and risk description
1. The platform may not cover **every single regulation** that can apply to a certain product.
2. The entries do not contain the entire legislation source text. Hence, these **do not cover every requirement**, scenario, or piece of information present in the source text. - The latest version of the relevant source text is always the most authoritative source text.
3. There can be **errors** in the entries/summaries.
4. **A newer version** of the regulation the entry/summary is based on may exist. See the Monthly Updates section in this document for detailed information. - Compliance Requirements List entries/summaries are by default based on the source versions available at the time of the initial publication. - Entries/summaries are only updated when there is an amendment that results in a substantial update of covered requirements. Hence, many amendments do not result in an update of the entry/summary.
5. The **linked sources** may be outdated, or the URL may have been redirected to another page. - The latest version of the relevant source text is always the most authoritative source text.
6. The platform does generally not cover **product standards**. – We do not include information and graphics (i.e., warning texts) that is available in standards that may be harmonised or referenced by a certain regulation. For example, the summary for CPSIA does not include information from ASTM F963-23. It is often necessary to purchase standards.
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.
Some summaries refer to certain **economic operators**, such as manufacturers and importers. The requirements can differ depending on the type of economic operator. a. Each summary generally only covers requirements relevant to **manufacturers, private labellers**, or other entities responsible for actively managing the compliance process. We do not cover requirements for or from the perspective of distributors, fulfilment centers, marketplaces, or government bodies. b. We recommend that you consider **all requirements** to be relevant, even if the economic operator is not an exact or obvious match for your company. c. The **definition** of a certain economic operator can differ between regulations. For example, a company importing products branded with their own trademark can be defined as a manufacturer and therefore assume the responsibilities of one. You can find the definitions and corresponding requirements in the source texts. d. In general, both **importers and manufacturers** are ultimately responsible for ensuring that products are compliant. However, retailers, distributors, and other economic operators can also be responsible.
9. **Technical errors** could result in summaries not being added to the compliance requirements list, in full or

in part.
10. A Compliance Requirements List is automatically generated based on **user inputs**. The system does not "know" or "understand" if these inputs are relevant to the product.
11. **Modules and specifications** are structured and phrased based on common use cases (i.e., EU toy module = Toy Safety Directive). However, there can be cases in which a regulation under one module is still relevant to products not mentioned by that module.

Document Templates



Feature information

+ All templates are created based on official sources.

Example: Directive 2014/35/EU > ANNEX IV

This means that the template is only based on ANNEX IV of Directive 2014/35/EU.

+ We always disclose the source the template is based on.

Limitations and risks

Limitation and risk description
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 regulation and the provisions the template is based on may exist. See the Monthly Updates section in this document for detailed information.
4. **Technical errors** can result in information not appearing correctly in the template (i.e., 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. - You must always check the file after downloading to ensure that no information is missing.
7. The templates do not cover information that is part of **product standards**.
8. Regulations can sometimes be open ended in the sense that it leaves certain decisions to the manufacturer or importer. For example, the exact wording of warning texts or batch number formats are often **not defined** – and therefore not part of the templates.

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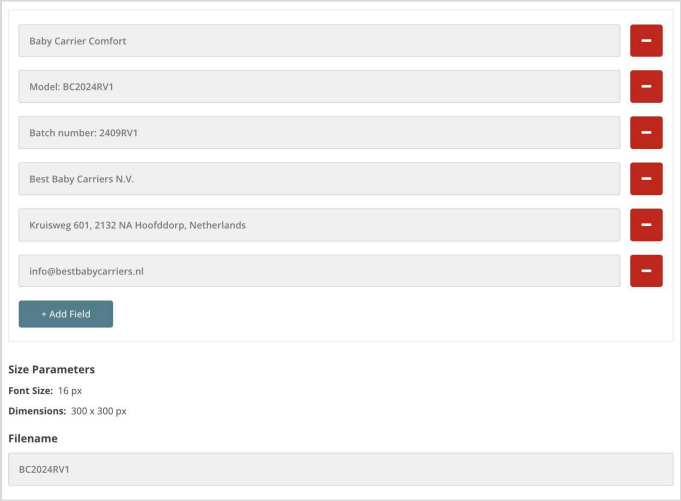
Label Creator



Feature information

+ You can access **summaries of labelling requirements** when creating a compliance requirements list.

2. You can use the **Label Creator** to create product and packaging label files.

Limitations and risks

Limitation and risk description
1. A **newer version** of the provisions that contain labelling requirements may exist. It is therefore important to review the linked source before you create the label file.
2. The exact wording of instructions, warnings, batch numbers, and other label texts are **not always defined** in the source texts.
3. **Technical errors** can result in information not appearing correctly in the template (i.e., missing fields or fields shown in the wrong order).
4. **Technical errors** when saving the template 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.
5. The template editor and label creator is only for text input. **Symbols and markings** must be added separately by the user.

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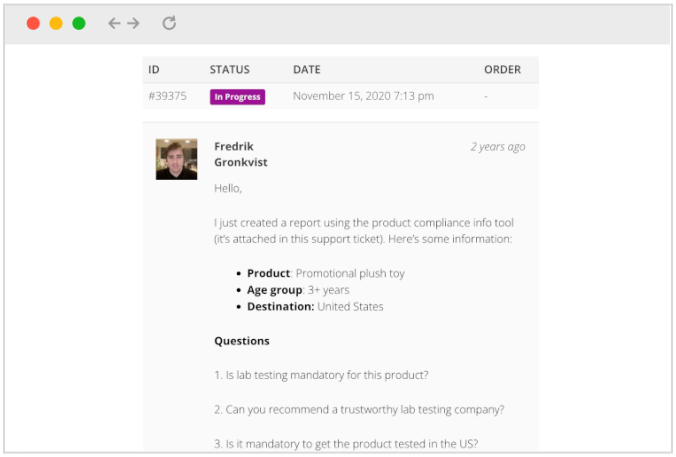
Support



Feature information

You can ask general questions about the compliance process. We can also recommend service providers in our network. This includes testing companies and consultants.

+ **Ask questions** about information in generated compliance requirements lists.

+ We can help you **search** for information in source texts.

+ Ask questions about **practical areas** of product compliance (i.e., label file formats, lab testing cost reduction, supplier vetting).

+ Request help with **lab test bookings** and other third-party services.

+ **Review files** generated through the Compliance Gate Platform.

+ **Review test reports** and certificates provided by suppliers or testing companies.

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Limitations and risks

Limitation and risk description
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 can only compare **reviewed files** to a particular source. We do not take other sources into consideration.
7. We do not **‘approve’ or ‘confirm’** labels, documents, certificates, or other files - including those generated using the templates.
8. We cannot approve or confirm the contents in files. - We can only determine if a particular label item, such as a company name or warning text, is present. However, we cannot confirm if the correct company has been specified, or if the warning text wording is correct.

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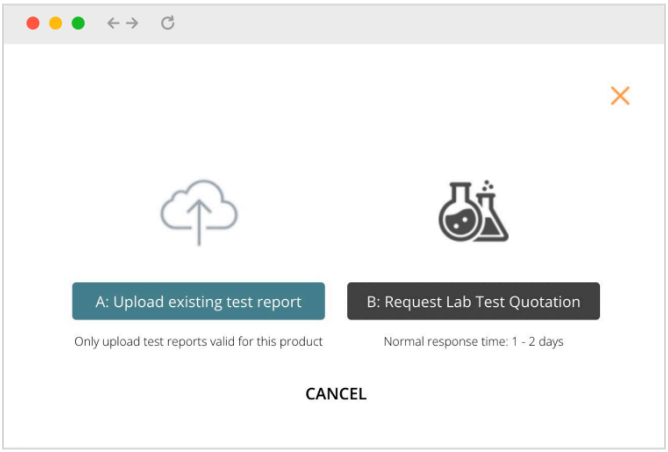
Lab Testing / Other Third-Party Services



Feature information

+ We refer our subscribers to **lab testing** companies and other **third-party** service providers.

+ For lab testing, we mainly refer our subscribers to QIMA and TUV Rheinland are accredited by multiple entities:

- QIMA Accreditations
- TUV Rheinland Accreditations

However, the specific accreditations can vary between branches and labs operated by the companies.

+ These companies can often help you **suggest relevant standards** or testing requirements for products.

Limitations and risks

Limitation and risk description
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.

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Monthly Updates

Feature information

+ We review a set of official sources to monitor new and updated regulations and standards on a monthly basis. You can learn more here:

- **US - Monthly Review Methodology**
- **EU - Monthly Review Methodology**
- **UK - Monthly Review Methodology**

+ We send a report each month summarizing our findings and specify if we deem it necessary to update the platform.

Limitations and risks

Limitation and risk description
1. We only review the **sources listed** in the Monthly Review Methodology (US, EU, and UK).
2. We do not guarantee that we **'catch' every single new** or updated compliance requirement.
3. We do **not update summaries, templates, and other data** in real-time. There is always a delay from the announcement to implementation in the platform.
4. Not all updates or amendments to regulations or other compliance requirements result in an update to the summary, template, or other data. This is evaluated on a **case-by-case basis**.

AI Tool

You can read about the limitations and risks concerning the AI tool in the **AI White Paper**.

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Source Versions

Compliance Requirements Lists

CRL Source Example

Sources

1. General Product Safety Regulation (EU) 2023/988 (Link)
2. Market Surveillance Regulation (EU) 2019/1020 (Link)
3. COMMISSION IMPLEMENTING REGULATION (EU) 2024/1435 (Link)
4. Corrigendum to Commission Implementing Regulation (EU) 2024/1435 (Link)

Note

1. This summary is based on the legal act (more recent versions may be available).
2. Created/Updated: 2024-08-20 (sources may have been updated since this date).

Sources - Explainer

The sources that the entry/summary is based on are listed.

Note - Explainer

1. This is the **source version** that the CRL entry/summary is based on (normally the legislation version available at the time of writing).

2. **Created/Updated** is changed in the following cases:

a. Amendment resulting in what we deem to be a **substantial change** of covered requirements

b. General improvements based on information in the sources (e.g. not link redirect or UI edits alone)

1: New CRL entry

(Includes rewritten CRL entries)

Based on the **legislation version** available at the time of writing.

Source version: The basis for the CRL entry does not change unless it is completely rewritten based on a future version of the legislation.

2: Regulation amendment/update

(e.g. EU OJ or Federal Register)

We assess if the amendment results in what we deem to be a **substantial change**

If yes: Update the CRL entry

1. The **source version** of the CRL entry remains unchanged

2. The **Created/Updated** date is updated

If no: No action

3. New regulation version published

(e.g. EUR Lex or eCFR)

a. CRL entry is **not updated** (only based on amendments which tend to be announced prior to EUR Lex or eCFR updates).

b. CRL Overview > Latest Source Version is updated

1. We check the sources versions **monthly**.

2. If a new version is available, we specify this in the CRL Overview. The purpose is to help you **keep track** of the latest source versions.

4. Other CRL entry edits

We may also edit parts of a CRL entry for the following reasons:

a. General improvements

b. UI changes

c. Source link updates (e.g. redirects).

Changes

1. The **source version** of the CRL entry remains unchanged

2. The **Created/Updated** date is only updated if the change is based on information in the sources (e.g. not link redirect or UI edits alone)

5. CRL entry is phased out

We phase out CRL entries in the following scenarios:

a. Legislation repealed

Example: GPSR replaced GPSD in Dec 2024.

b. Module or CRL entry removal

Document templates

Template Source Example

Source: Low Voltage Directive 2014/35/EU > ANNEX IV

1. This template is based on the legal act (more recent versions may be available).

2. Created/Updated: 2024-08-07 (sources may have been updated since this date).

Source - Explainer

This specifies the legislation and the part of the legislation that the template is based on.

Note - Explainer

1. This is the **source version** that the template is based on

- Initially the legislation version available at the time of writing
- Updated if there is a change in the legislation version (Point 3)

2. Created/Updated is changed in the following cases:

- New source version (template items need update)
- New source version (template items do not need update)
- General improvements based on information in the sources (e.g. not link redirect or UI edits alone)

1: New Template

Based on the **legislation version** available at the time of writing.

2: Regulation amendment/update

(e.g. EU OJ or Federal Register)

We **do not** update templates based on amendments

3. New regulation version published

(e.g. EUR Lex, eCFR or guidance page)

Checked monthly: We review the relevant annex/article/part/page to determine if the new version is matching or not matching the existing template

Matching > No template update > 1. Template source version update (matching latest version) > 2. Created/Updated/Reviewed date updated

Not matching > Update template items > 1. Template source version update > 2. Created/Updated/Reviewed date updated

Note: Template overview is updated monthly

4. Other template edits

We may also edit templates for the following reasons:

a. General improvements

b. UI updates

c. Source link updates (e.g. redirects).

Source version

1. The basis of the template remains unchanged

2. Created/Updated/Reviewed date is only updated if the change is based on information in the sources (e.g. not link redirect or UI edits alone)

5. Template is phased out

We phase out templates in the following scenarios:

a. Legislation repealed

Example: GPSR replaced GPSD in Dec 2024.

b. Template, module or CRL entry removal