
Professional Code of Ethics

Regulatory consultancy for electronic products. Commitments to independence, confidentiality and technical integrity applicable to every service provided under the DUASCE brand.

Introduction and purpose

For years I assessed the conformity of electronic products from inside an accredited body. In that role, independence, confidentiality and technical integrity were mandatory requirements. Any failure in those principles compromised the validity of the certificates issued and the credibility of the organisation.

Today I work on the other side: as an independent consultant serving the manufacturer. I believe my clients should know exactly how I work and what they can expect from me in any circumstance.

My job is not to obtain an approval at any cost. My job is to help the manufacturer demonstrate real, robust and defensible compliance before authorities, conformity assessment bodies, customers and the market.

This code applies to every service provided under the DUASCE brand.

Fundamental ethical principles

1 Independence and technical impartiality

I provide my services on the manufacturer's side, with no financial, contractual or functional ties to laboratories or certification bodies.

- I receive no commissions, gifts or financial benefit from any laboratory or Notified Body I coordinate projects with. The client contracts directly with the entity it chooses.
- Laboratory and Notified Body recommendations rest solely on technical criteria, lead time, proximity and cost. I do not recommend tests, certifications, external services or regulatory activities that add no reasonable value to regulatory compliance or to the client's legitimate objectives.
- If I perceived that a recommendation could be influenced by an interest other than the client's, I would disclose it proactively.
- No financial or commercial consideration, nor the continuity of the professional relationship, will ever prevail over my technical and regulatory judgement.

2

Absolute confidentiality of technical information

The technical information my clients share with me is handled with the same reserve that a trade-secret environment would demand.

- I do not share or disclose a client's technical or commercial information without explicit written consent.
- Each client's documents are stored in secure environments, segregated from all other projects.
- The confidentiality obligation remains in force indefinitely after the commercial relationship ends.
- I offer to sign a non-disclosure agreement (NDA) at the start of every project if the client considers it necessary.

3

Active management of conflicts of interest

A conflict of interest exists when I might hold an interest that competes with the client's and could influence my technical judgement.

- At the start of any new commercial relationship I assess whether a potential conflict of interest exists.
- If any potential conflict is identified, the affected parties are notified and effective separation measures are agreed.
- If a conflict proves unresolvable, I will inform the affected client and refer them to an alternative professional.

4 Technical honesty and transparency

The value I offer rests on technical judgement, and that judgement is only worth something if it is honest — even when the conclusion is not the one the client expects or wants.

- If the analysis shows that a product does not meet the applicable requirements, I will say so clearly, without downplaying risks.
- I do not provide advice aimed at circumventing applicable requirements or at giving the appearance of compliance that has not been duly verified.
- If a client's technical proposal entails regulatory risks, I will flag them even if the client would rather not face them.
- If I lack sufficient technical certainty on an aspect, I will state it and refer the matter to the appropriate specialist.

5 Continuous technical competence

The regulatory framework for electronic products evolves constantly. My commitment to clients includes keeping my technical competence current in the areas where I provide services.

- I keep up with relevant regulatory changes: new directives, regulations and harmonised standards.
- I do not accept projects for which I lack the experience, the resources or the availability to deliver quality work.

6 Responsible use of AI tools

I use artificial intelligence tools to support research tasks, gaining efficiency without delegating decision-making.

- All AI-generated or AI-assisted content is reviewed and verified against official sources before it becomes part of any deliverable.
- Regulatory judgement, interpretation of standards, risk assessment and technical decisions are always human.
- Clients may request information on the use of AI tools at any stage of their project.

Complaints channel

I treat any complaint as an opportunity to improve, and I act with the same transparency I demand in the rest of my work.

PREFERRED CHANNEL

complaint@duasce.eu

RESPONSE TIME

Acknowledgement within 24 working hours. Reasoned response within 5 working days at the latest.

COMMITMENT

Objective analysis, communication of conclusions and corrective measures where appropriate.

INDEPENDENT REVIEW

Clients may request independent professional mediation through a mediation body. Costs are shared 50/50.

Validity and availability

This document is reviewed annually, and the version in force is always available at www.duasce.eu/about to any interested party.

SIGNED BY

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