

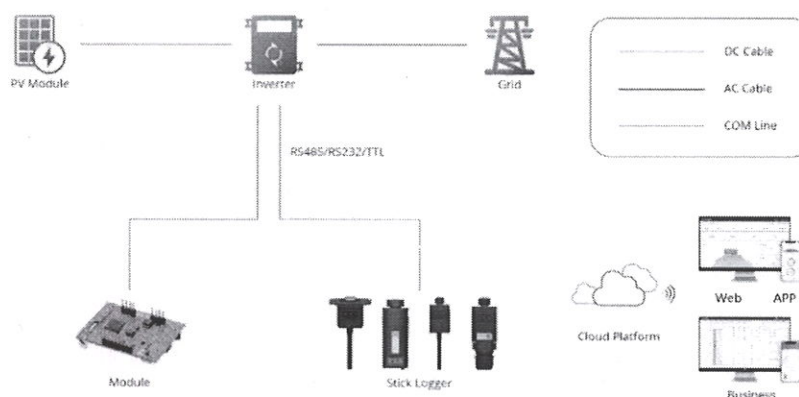
DECLARATION OF CONFORMITY

We

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Declares the following:

- 1) The inverter include a system of internal and external logic communications as summarized in the following scheme:



where the main components involved and their main functions are explained in the following table:

Name	Meaning	Function	Location
Module/Stick Logger	Monitoring Device	Collect inverter data and upload data to the remote server by WiFi, and establish the tunnel between the inverter and the remote server	Monitoring device
Monitoring	WIFI	Monitoring device to realize remote monitoring function	Monitoring device
Router	Router device	transmission of data to cloud server, reception of commands/settings from external stakeholder	Third-party device
Inverter	Inverter device	Convert the DC power output of	Inverter device

		photovoltaic module into AC power	
Cloud Platform	Cloud	Management platform that supports data collection, plant monitoring, and operation and maintenance of PV power plants	Cloud Server

2) The module/Stick Logger communicates with the external inverter through serial lines(RS485).

3) The communication between the module/Stick Logger and the remote server via WiFi.

4) All communications between the server and the subjects/parties are cyber-protected by SSL/TLS technology.

5) The cyber-security assessment of the inverter communication system was performed according to the ETSI EN 303645 standard, and it is reported according to the Table B.1 form of the same standard:

EN 303 645 v2.1.1 (2020-06) Table B.1: Implementation of provisions for consumer IoT security			
Clause number and title			
Reference	Status	Support	Detail
5.1 No universal default passwords			
Provision 5.1-1	M C (1)	Y	
Provision 5.1-2	M C (2)	Y	
Provision 5.1-3	M	Y	
Provision 5.1-4	M C (8)	Y	
Provision 5.1-5	M C (5)	Y	
5.2 Implement a means to manage reports of vulnerabilities			
Provision 5.2-1	M	Y	
Provision 5.2-2	R	Y	
Provision 5.2-3	R	Y	
5.3 Keep software updated			
Provision 5.3-1	R	Y	
Provision 5.3-2	MC (5)	Y	
Provision 5.3-3	MC (12)	N/A	The final user can't update any sw component: only manufacturer assistance service personnel can do it
Provision 5.3-4	RC (12)	Y	The manufacturer manages the updates of the systems by means of remote automatic, selectively by type of machine or by activating special functions at the request of the user

Provision 5.3-5	RC (12)	N/A	Check note at 5.3-4
Provision 5.3-6	RC (9,12)	N/A	Check note at 5.3-4
Provision 5.3-7	M C (12)	Y	
Provision 5.3-8	M C (12)	Y	Check note at 5.3-4
Provision 5.3-9	R C (12)	Y	
Provision 5.3-10	M (11,12)	Y	
Provision 5.3-11	RC (12)	Y	
Provision 5.3-12	RC (12)	N/A	
Provision 5.3-13	M	Y	
Provision 5.3-14	R C (3,4)	N/A	The device is not constrained.
Provision 5.3-15	R C (3,4)	N/A	The device is not constrained.
Provision 5.3-16	M	Y	
5.4 Securely store sensitive security parameters			
Provision 5.4-1	M	Y	
Provision 5.4-2	M(10)	Y	
Provision 5.4-3	M	N/A	Hard-coded identity not used in source code
Provision 5.4-4	M	Y	
5.5 Communicate securely			
Provision 5.5-1	M	Y	
Provision 5.5-2	R	Y	
Provision 5.5-3	R	Y	
Provision 5.5-4	R	Y	
Provision 5.5-5	M	Y	
Provision 5.5-6	R	Y	
Provision 5.5-7	M	Y	
Provision 5.5-8	M	Y	
5.6 Minimize exposed attack surfaces			
Provision 5.6-1	M	Y	
Provision 5.6-2	M	Y	
Provision 5.6-3	R	Y	
Provision 5.6-4	MC(13)	Y	
Provision 5.6-5	R	Y	
Provision 5.6-6	R	Y	
Provision 5.6-7	R	Y	
Provision 5.6-8	R	Y	
Provision 5.6-9	R	Y	
5.7 Ensure software integrity			
Provision 5.7-1	R	N/A	This is not implemented in DUT due to software development limitation.
Provision 5.7-2	R	N/A	This is not implemented in DUT due to software development limitation.
5.8 Ensure that personal data is secure			
Provision 5.8-1	R	N/A	No personal data transit through the device.
Provision 5.8-2	M	N/A	
Provision 5.8-3	M	N/A	
5.9 Make systems resilient to outages			
Provision 5.9-1	R	Y	
Provision 5.9-2	R	Y	
Provision 5.9-3	R	Y	
5.10 Examine system telemetry data			
Provision 5.10-1	RC (6)	N/A	
5.11 Make it easy for users to delete user data			
Provision 5.11-1	M	N/A	No personal data are stored in the device.
Provision 5.11-2	R	N/A	
Provision 5.11-3	R	N/A	



Provision 5.11-4	R	N/A	
5.12 Make installation and maintenance of devices easy			
Provision 5.12-1	R	Y	
Provision 5.12-2	R	Y	
Provision 5.12-3	R	Y	
5.13 Validate input data			
Provision 5.13-1	M	Y	
6 Data protection provisions for consumer IoT			
Provision 6.1	M	N/A	This is not necessary to be implemented due to no personal data processed.
Provision 6.2	MC (7)	N/A	This is not necessary to be implemented due to no personal data processed.
Provision 6.3	M	N/A	This is not necessary to be implemented due to no personal data processed.
Provision 6.4	RC (6)	N/A	No personal data are stored in the device.
Provision 6.5	MC(6)	N/A	No personal data are stored in the device.
Conditions:			
1) passwords are used; 2) pre-installed passwords are used; 3) software components are not updateable; 4) the device is constrained; 5) the device is not constrained; 6) telemetry data being collected; 7) personal data is processed on the basis of consumers' consent; 8) the device allowing user authentication; 9) the device supports automatic updates and/or update notifications; 10) a hard-coded unique per device identity is used for security purposes; 11) updates are delivered over a network interface; 12) an update mechanism is implemented; 13) a debug interface is physically accessible.			
Status' Column: M: Mandatory provision R: Recommended provision M C: Mandatory and conditional provision R C: Recommended and conditional provision			
Support' Column: Y: Implemented N: Not implemented N/A: Not applicable			

Signature: Zhen zhen QiPosition: ManagerDate: 13th April, 2023