

EU DECLARATION OF CONFORMITY

MODEL STRUCTURE OF ANNEX V, REGULATION (EU) 2024/2847

DECLARATION NO.	
VERSION	
DATE OF ISSUE	
REPLACES	

1. Product identification Annex V, point 1: "Name and type and any additional information enabling the unique identification of the product with digital elements"	
Product name	
Type / model	
Software version(s) firmware, application, console	
Hardware revision	
Serial or batch range and where the identification is marked on the product	
2. Manufacturer, or its authorised representative Annex V, point 2: "Name and address of the manufacturer or its authorised representative"	
Name	
Address	
Capacity manufacturer, or authorised representative under a written mandate (Article 18)	
3. Responsibility statement Annex V, point 3: "A statement that the EU declaration of conformity is issued under the sole responsibility of the provider" (the Regulation's wording; Article 28(4) places that responsibility on the manufacturer)	
This EU declaration of conformity is issued under the sole responsibility of the manufacturer named in point 2.	
4. Object of the declaration Annex V, point 4: "Object of the declaration (identification of the product with digital elements allowing traceability, which may include a photograph, where appropriate)"	
Identification allowing traceability	
Photograph where appropriate; reference to an annex	

5. Conformity statement and the Union legal acts covered

Annex V, point 5: "A statement that the object of the declaration described above is in conformity with the relevant Union harmonisation legislation". Article 28(3): one single declaration for all Union legal acts that require one, each identified with its publication reference.

The object of the declaration described above is in conformity with the relevant Union harmonisation legislation listed below.

Union legal acts covered each with its publication reference	
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6. Standards, specifications or certification relied on

Annex V, point 6: "References to any relevant harmonised standards used or any other common specification or cybersecurity certification in relation to which conformity is declared"

Harmonised standards reference, title, version or date	
Common specifications	
European cybersecurity certification	

7. Notified body and conformity assessment procedure, where applicable

Annex V, point 7: "Where applicable, the name and number of the notified body, a description of the conformity assessment procedure performed and identification of the certificate issued"

Conformity assessment procedure performed Annex VIII	
Notified body name and number, or "not applicable"	
Certificate issued identification, or "not applicable"	

8. Additional information and signature

Annex V, point 8: "Additional information: Signed for and on behalf of: (place and date of issue): (name, function) (signature):"

Additional information support period, technical documentation reference, vulnerability reporting contact, or other	
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SIGNED FOR AND ON BEHALF OF	PLACE AND DATE OF ISSUE
NAME, FUNCTION	SIGNATURE

Blank form laid out to Annex V of Regulation (EU) 2024/2847. Nothing is pre-filled; the completed declaration is the manufacturer's own statement.

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Notes for the manufacturer (not part of the declaration)

This blank form reproduces the model structure of Annex V of Regulation (EU) 2024/2847, with each required element given its own field. It contains no entries. Completing and signing it is the manufacturer's act: by drawing up the declaration, the manufacturer assumes responsibility for the compliance of the product (Article 28(4)). Whether a product falls under the Regulation, which conformity assessment procedure applies and whether the requirements are met are questions for the manufacturer and, where needed, its legal adviser. Penumbral Labs takes no position on them.

ARTICLE 28, EU DECLARATION OF CONFORMITY (VERBATIM)

1. The EU declaration of conformity shall be drawn up by manufacturers in accordance with Article 13(12) and state that the fulfilment of the applicable essential cybersecurity requirements set out in Annex I has been demonstrated.
2. The EU declaration of conformity shall have the model structure set out in Annex V and shall contain the elements specified in the relevant conformity assessment procedures set out in Annex VIII. Such a declaration shall be updated as appropriate. It shall be made available in the languages required by the Member State in which the product with digital elements is placed on the market or made available on the market.
The simplified EU declaration of conformity referred to in Article 13(20) shall have the model structure set out in Annex VI. It shall be made available in the languages required by the Member State in which the product with digital elements is placed on the market or made available on the market.
3. Where a product with digital elements is subject to more than one Union legal act requiring an EU declaration of conformity, a single EU declaration of conformity shall be drawn up in respect of all such Union legal acts. That declaration shall contain the identification of the Union legal acts concerned, including their publication references.
4. By drawing up the EU declaration of conformity, the manufacturer shall assume responsibility for the compliance of the product with digital elements.
5. The Commission is empowered to adopt delegated acts in accordance with Article 61 to supplement this Regulation by adding elements to the minimum content of the EU declaration of conformity set out in Annex V to take account of technological developments.

ANNEX VI, SIMPLIFIED EU DECLARATION OF CONFORMITY (MODEL, VERBATIM)

"Hereby, ... [name of manufacturer] declares that the product with digital elements type ... [designation of type of product with digital element] is in compliance with Regulation (EU) 2024/2847.

The full text of the EU declaration of conformity is available at the following internet address: ..."

Article 13(20): the manufacturer provides either a copy of the EU declaration of conformity or this simplified declaration with the product; the simplified declaration must contain the exact internet address at which the full declaration can be accessed.

Points to check before signing: the declaration identifies the product it is drawn up for (Annex VIII, Module A, point 4.2); it contains the elements the applicable procedure in Annex VIII requires; every standard, specification or certification cited in point 6, and every test or result the technical documentation relies on, actually exists in the technical documentation kept under Article 31 and Annex VII; it is kept, with the technical documentation, at the disposal of the market surveillance authorities for at least 10 years after the product is placed on the market or for the support period, whichever is longer (Article 13(13)); and it is updated when the product or the standards it cites change. Source of every quotation: Regulation (EU) 2024/2847, OJ L, 2024/2847, 20.11.2024, ELI <http://data.europa.eu/eli/reg/2024/2847/oj>, read on EUR-Lex on 13 October 2026.

Prepared by Penumbral Labs S.à r.l.-S, 40, rue Emile Mark, L-4620 Differdange, Luxembourg · R.C.S. Luxembourg B312553 · Business permit no. 10200305/0 · penumbrallabs.com. The form pages carry no Penumbral Labs marking on purpose: the declaration is the manufacturer's document.