

EU DECLARATION OF CONFORMITY

Issued pursuant to Annex VI of Directive 2014/53/EU (Radio Equipment Directive)

Declaration No.	STEER-ST013B-DOC-2026-001
Place of issue	Paralimni, Cyprus
Date of issue	7 May 2026

1. Manufacturer

Name	S.E. SMARTERS ENGINEERED LTD
Address	Efesou 9, 5290 Paralimni, Famagusta, Cyprus
Identifiers	Company Reg. HE465488 · VAT CY60097979Z
Electronic contact	compliance@steer.so

This declaration is issued under the sole responsibility of the manufacturer. S.E. SMARTERS ENGINEERED LTD places the product on the Union market under its own trademark and is therefore the manufacturer within the meaning of Article 2(1)(13) of Directive 2014/53/EU.

2. Object of the Declaration

Product	Radio equipment — Bluetooth Low Energy OBD2 diagnostic adapter
Trade designation	STEER ST013B (M/N ST013B) — trademark: STEER
Base model	Manufacturer's base hardware: Lonauto B14A V1.5, within model family LB03 / LB02 as covered by the supporting test reports and certificates listed in Section 5.
Serial range	ST013B-2026-000001 onwards
Frequency band	2402 – 2480 MHz (Bluetooth Low Energy, 2.4 GHz band)
Max. RF output power	< 10 mW EIRP (declared operating ceiling; measured worst case ≈ 1.6 mW EIRP)
Power supply	DC 12 V from the vehicle OBD-II port. No internal battery.

The product identified above is the object of this declaration. "STEER ST013B" is the trade designation under which the manufacturer places on the market the base hardware Lonauto B14A V1.5; the hardware, firmware and certified configuration are unchanged. A model-equivalence statement bridging the tested model designations (LB02 / LB03 / B14A V1.5) to the trade designation ST013B is held in the technical documentation.

3. Declaration of Conformity

The object of the declaration described in Section 2 is in conformity with the relevant Union harmonisation legislation: **Directive 2014/53/EU** of the European Parliament and of the Council of 16 April 2014 on the harmonisation of the laws of the Member States relating to the making available on the market of radio equipment.

The conformity assessment procedure applied is that set out in **Annex II (Module A — internal production control)** of Directive 2014/53/EU. The essential requirements of Article 3 have been demonstrated by application of the harmonised standards listed in Section 5.

4. Harmonised Standards and Technical Specifications Applied

RED requirement	Harmonised standard(s)	Supporting report
Art. 3(1)(a) Health & Safety	EN IEC 62368-1:2024+A11:2024 (safety) EN 62479:2010 · EN 50663:2017 (RF exposure / health)	ZKT-2505220111S (safety) ZKT-2505220105E-1 (health)
Art. 3(1)(b) EMC	ETSI EN 301 489-1 V2.2.3 (2019-11) ETSI EN 301 489-17 V3.3.1 (2024-09)	ZKT-2505220105E-2
Art. 3(2) Radio spectrum	ETSI EN 300 328 V2.2.2 (2019-07)	ZKT-2505220105E-3
Art. 3(3)(d) Network protection	EN 18031-1:2024	psi2601140-C01-R01

RED requirement	Harmonised standard(s)	Supporting report
Art. 3(3)(e) Personal data & privacy	EN 18031-2:2024	psi2601140-C01-R02

Articles 3(3)(d) and 3(3)(e) apply pursuant to Commission Delegated Regulation (EU) 2022/30, applicable to radio equipment placed on the market from 1 August 2025. EN 18031-3:2024 (Art. 3(3)(f) — protection from fraud) is **not applicable**: the device does not process money or virtual currency; subscription billing is handled exclusively by Stripe and Apple, not by the device.

5. Supporting Attestations and Conformity Assessment Bodies

The essential requirements under Article 3(1) and 3(2) are evidenced by CE-RED Attestation of Compliance **ZKT-2505220105C** (issued 29 May 2025) and its underlying test reports, issued by **Shenzhen ZKT Technology Co., Ltd.** The essential requirements under Article 3(3)(d) and 3(3)(e) are evidenced by test reports **psi2601140-C01-R01** and **psi2601140-C01-R02** (issued January 2026) by **Shenzhen PSI Testing Co., Ltd.**

Notified Body: No Notified Body was involved in the conformity assessment. Conformity was assessed by the manufacturer under Annex II (internal production control) of Directive 2014/53/EU, supported by the voluntary test reports and attestations of the independent testing laboratories named above. Shenzhen ZKT Technology Co., Ltd. and Shenzhen PSI Testing Co., Ltd. are accredited testing laboratories and are not Notified Bodies.

6. Note on the Application of EN 18031-1 and EN 18031-2

EN 18031-1 (network protection) was applied on the basis that the ST013B, together with its companion mobile application, forms part of an internet-connected system; conformity was demonstrated by test (Report psi2601140-C01-R01). **EN 18031-2** (personal data and privacy) was applied because the device processes personal data over a wireless interface; conformity was demonstrated by test (Report psi2601140-C01-R02). The full applicability rationale, together with the model-equivalence statement bridging the tested model (LB02) to the base model B14A V1.5 and the trade designation ST013B, is recorded in the technical documentation.

7. Other Applicable EU Legislation (separate compliance regimes — not part of this RED declaration)

- **Directive 2011/65/EU** as amended by (EU) 2015/863 and (EU) 2017/2102 — RoHS. Evidenced by RoHS Certificate ZKT-25052210461C and Test Report ZKT-25052210461R (Shenzhen ZKT Technology Co., Ltd., 29 May 2025).
- **Regulation (EC) No 1907/2006** — REACH. Evidenced by SVHC Test Report ZKT-2505149125R (20 May 2025); all Candidate List substances of very high concern below 0.1% (w/w).
- **Regulation (EU) 2023/988** — General Product Safety Regulation (GPSR). Manufacturer obligations under Articles 9 and 16. The EU responsible economic operator under GPSR Article 16 is the manufacturer, S.E. SMARTERS ENGINEERED LTD, at the address in Section 1; electronic contact: compliance@steer.so.
- **Directive 2012/19/EU** — WEEE. Separate collection applies; see the User Manual for disposal information.
- **Regulation (EU) 2023/1542** — Battery Regulation. Not applicable: the device contains no internal battery and is powered exclusively from the vehicle OBD-II port.

EMC requirements applicable to this radio equipment are addressed under Article 3(1)(b) of Directive 2014/53/EU; Directive 2014/30/EU (EMC) does not apply to radio equipment within the scope of the RED.

8. Technical Documentation

The technical documentation required by Annex V of Directive 2014/53/EU is compiled and held by the manufacturer at the address given in Section 1, and is available to the competent national authorities for ten years after the radio equipment has been placed on the market. Requests: compliance@steer.so.

Signed for and on behalf of S.E. SMARTERS ENGINEERED LTD

Place	Paralimni, Cyprus	Name	Sebastian Antonio Pardo Gomez
Date	7 May 2026	Function	Director



Signature — Sebastian Antonio Pardo Gomez, Director