TRUST AND VERIFY

TrustCB Site Certification Scheme

Site Security Certification Report

ACT Dongguan Technology Limited

Sponsor:	***Apply Card Technology Limited*** **Unit 24A & B, 9/F., Well Fung Ind. Ctr., 68 Ta Chuen Ping St.,** **Kwai Chung, N.T.,** **Hong Kong**
Site Operator:	***ACT Dongguan Technology Limited*** **Building B, Shang Sha Industrial Centre, 6 Xin Chun Road,** **Chang An, Dongguan, 523841** **China**
Evaluation facility:	***TÜV Informationstechnik GmbH*** **Am TÜV 1,** **45307 Essen,** **Germany**
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CONTENTS

Foreword

TrustCB is a fully independent commercial Certification Body specialising in the provision of high-assurance, security certifications for ICT products and associated sites, processes and services.

TrustCB is widely recognised for its schemes and certification work referencing the Common Criteria (CC) and Common methodology (CEM) for Information Technology Security Evaluation. CC and CEM are published by ISO/IEC as ISO/IEC 15408, Evaluation criteria for IT security and ISO/IEC 18045 Methodology for IT security evaluation (CC).

Common Criteria based Site Certifications have long been recognised in demonstrating security in a product lifecycle. TrustCB has significant experience in the certification of sites referencing the SOG-IS recognised Netherlands Scheme for Certification in the Area of IT Security (NSCIB) scheme.

Since “site certification” is not explicitly defined in the EUCC Regulation, (EU) 2024/482, TrustCB has developed the TrustCB **Site Certification Scheme**. The scheme is in full alignment with EUCC requirements and State of the Art documents, and ready for recognition across cooperating schemes.

Importantly, the scheme is built on the NSCIB site-audit framework. Its principles are aligned with those adopted under the SOG-IS agreement and used by the SOG-IS based national schemes, now all superseded by EUCC. As such, the TrustCB Site Certification scheme ensures continuity with the recognised best practices used for STAR acceptance under SOGIS, as the ecosystem is now firmly transitioned to EUCC.

By awarding a TrustCB Site Certification Scheme certificate, TrustCB B.V. certifies that a site complies with the security requirements specified in the associated Site Security Target, in compliance the Common Criteria standards.

The consumer of this certification should review the Site Security Target (SST) in addition to this Certification Report, to gain an understanding of any assumptions made during the evaluation, and the level of confidence that the site satisfies the security requirements stated in the Site Security target.

Recognition of the Certificate

At the time of publication, the Common Criteria Recognition Arrangement (CCRA) does not cover the recognition of Site Certificates. The site-security evaluation process, however, followed all the rules of these agreements and used the agreed supporting document for site certification *[CCDB]*. Therefore, the results of this evaluation and certification procedure are available for use in any scheme in subsequent product evaluations and certification procedures that make use of the certified site.

The reuse of this certification with a third-party Certification Body should always be checked with the intended consuming Certification Body ahead of being reused.

1 Executive Summary

This Certification Report states the outcome of the Common Criteria security evaluation of the ACT Dongguan Technology Limited. The sponsor of the evaluation and certification is Apply Card Technology Limited located in Hong Kong and the operator of the site is ACT Dongguan Technology Limited.

The evaluated site is: ACT Dongguan Technology Limited.

The site is used by Apply Card Technology Limited to participate in the testing and production of hardware/software for secure IC hardware products. To perform its activities, the site uses the ACT Dongguan Technology Limited provided remote IT-infrastructure and local IT equipment (workstations, router, VPN) and works according to the ACT Dongguan Technology Limited defined processes. The site manufactures inlays and IC modules, performs electrical (only) testing of finished inlays and IC modules and destruction of defect inlays and IC modules, and handles customer initialization scripts.

The site activities could be related to Phase 4 of the seven phases of the Lifecycle Model as defined in *[PP]*.

The site has been evaluated by TÜV Informationstechnik GmbH located in Essen, Germany. The evaluation was completed on 2026-07-24 with the approval of the ETR. The site audit was performed 2026-05-07/08

The certification procedure has been conducted in accordance with the provisions of the TrustCB Site Certification Scheme *[TrustCB-SP].*

The scope of the evaluation is defined by the Site Security Target *[SST]*, which identifies assumptions made during the evaluation and the level of confidence (evaluation assurance level) the site is intended to satisfy for product evaluations. Users of this site certification are advised to verify that their own use of, and interaction with, the site is consistent with the Site Security Target, and to give due consideration to the comments, observations and recommendations in this certification report.

The results documented in the Evaluation Technical Report *[ETR]*[1] and *[STAR]*[2] for this site provide sufficient evidence that this site meets the EAL6 assurance components ALC_CMC.5, ALC_CMS.5, ALC_DVS.2 (at AVA_VAN.5 level), and ALC_LCD.1.

The evaluation was conducted using the Common Methodology for Information Technology Security Evaluation, CEM:2022 *[CEM]* and the Supporting Document Guidance: CCDB-2007-11-001 Site Certification, October 2007, Version 1.0, Revision 1 *[CCDB]*, for conformance to the Common Criteria for Information Technology Security Evaluation, CC:2022 *[CC]*.

TrustCB B.V., as Certification Body for this site certification activity, declares that the evaluation meets all the conditions of the Common Criteria and that the site certificate will be included on the TrustCB webpage of certified sites.

Note that the certification results apply only to the specific site, used in the manner defined in the *[SST]*.

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1 The Evaluation Technical Report contains information proprietary to the developer and/or the evaluator, and is not available for public review.

2 The Site Technical Audit Report contains information necessary to an evaluation lab and certification body for the reuse of the site audit report in a TOE evaluation.

2 Certification Results

2.1 Site Identification

The Target of Evaluation (TOE) for this evaluation is the ACT Dongguan Technology Limited located in Dongguan, China.

2.2 Scope: Physical

This site certification considers a single building location occupied only by ACT Dongguan Technology Limited.

The area where the relevant activities take place is limited to the following areas of “Building B”.

- 1/F is used for logistic, scrapping and warehouse, IC chipset & wafer storage cleanroom function.
- 2/F is used for production.
- 3/F is used for production.
- 4/F is used for production.

2.3 Scope: Logical

This site is used for manufacturing and testing of inlays and IC modules. Testing is electric test only. No security relevant test is provided in ACTDG.

For smartcard products, these activities could be related to Phase 4 of the seven phases of the Lifecycle Model in *[PP]*.

Within those phases, the site is involved in:

- ALC_DVS to control access to the assets (at AVA_VAN.5 level)
- ALC_CMC/CMS to handle the site internal documentation and TOE development-related configuration items
- ALC_LCD as part of TOE development and testing

This site does not have a direct role in ALC_TAT or ALC_DEL, and therefore those activities in an associated TOE evaluation are not impacted by the operations of this site.

2.4 Evaluation Approach

The evaluation is a new evaluation of a previously evaluated site, based on developer documentation of site changes and update to CC2022.

In the evaluation all evaluator actions, including a site visit, have been performed. The site audit was carried out in-person for two days with two evaluators. For assessment of the ALC_DVS aspects, the Minimum Site Security Requirements *[MSSR]* have been used.

2.5 Evaluation Results

The evaluation lab documented its evaluation results in the *[ETR]*[3], which references other evaluator documents. To support reuse of the site evaluation activities a derived document *[STAR]*[4] was provided and approved. This document provides details of the site evaluation that must be considered when this site is used in a product evaluation.

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[3] The Evaluation Technical Report contains information proprietary to the developer and/or the evaluator, and is not available for public review.

[4] The Site Technical Audit Report contains information necessary to an evaluation lab and certification body for the reuse of the site audit report in a TOE evaluation.

The evaluation lab concluded that the site meets the assurance requirements listed in the *[SST]* as assessed in accordance with *[CC], [CEM]* and *[CCDB]*.

2.6 Comments/Recommendations

The Site Security Target *[SST]* contains necessary information about the usage of the site. During a product evaluation, the evidence for fulfilment of the Assumptions listed in the *[SST]* shall be examined by the evaluator of the product when reusing the results of this site evaluation.

3 Site Security Target

The Site Security Target of ACT Dongguan Technology Limited, v3.0, May 2026 *[SST]* is included here by reference.

Please note that for the need of publication a public version *[SST-lite]* has been created and verified according to *[ST-SAN]*.

4 Definitions

This list of acronyms and definitions contains elements that are not already defined by the CC or CEM:

ACT	Apply Card Technology
ACTDG	Apply Card Technology Dongguan
IT	Information Technology
ITSEF	IT Security Evaluation Facility
JIL	Joint Interpretation Library
MSSR	Minimum Site Security Requirements
SST	Site Security Target
TOE	Target of Evaluation

5 Bibliography

This section lists all referenced documentation used as source material in the compilation of this report.

[CC]	Common Criteria for Information Technology Security Evaluation, Parts 1 to 5, CC:2022 Revision 1, November 2022
[CCDB]	Supporting Document Guidance: CCDB-2007-11-001 Site Certification, October 2007, Version 1.0, Revision 1
[CEM]	Common Methodology for Information Technology Security Evaluation, CEM:2022 Revision 1, November 2022
[ETR]	ETR FOR SITE CERTIFICATION, SiteCC-2600005-01_ETR_260723_v2.docx, v2, 23 July 2026
[STATUS]	SiteCC-2600005-01_STATUS, v6.0, July 2026
[MSSR]	EUCC Scheme State-of-The-Art Document - Minimum Site Security Requirements, Version 2.0, February 2025
[PP]	Security IC Platform Protection Profile including Functional Packages, Version 2.0, BSI-CC-PP-0084-V2-2026, February 25, 2026
[TrustCB-SP]	TrustCB Scheme procedure - Site Certification v1.1
[SST]	Site Security Target of ACT Dongguan Technology Limited, v3.0, May 2026
[SST-lite]	Site Security Target Lite of ACT Dongguan Technology Limited, v1.0, May 2026
[ST-SAN]	ST sanitising for publication, CC Supporting Document CCDB-2006-04-004, April 2006
[STAR]	SITE TECHNICAL AUDIT REPORT (STAR) ACT Dongguan Technology Limited, SiteCC-2600005-01_STAR_ACTDG_260723_v2.docx, v2, 23 July 2026

(This is the end of this report.)