

Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 1 of 23

Palm Commodities International LLC 1717 JP Hennessy Drive LaVergne, TN 37086 United States

This report supersedes all previous documents bearing the test report number 5176412-CH01-R1.

The following sample(s) was/were submitted and identified by/on behalf of the client as:

Nickel Sulfamate Solution
Lot: NIM1-240409

Sample Received Date: 05/16/2024

Testing Period: **05/17/2024 – 05/24/2024**

Revision Date : R1: 05/30/2024

R2: 06/10/2024

Revision Summary : R1: Date on report updated.

R2: PFAS Content added. Chlorine content revised following retest.

Test Requested : Please refer to the result summary.

Test Method & Results : Please refer to next page(s).

Result Summary :

Test R	equested	Conclusion
1.	RoHS Directive (EU) 2015/863 amending Annex II to Directive 2011/65/EU	PASS
2.	Organotin Content	PASS
3.	Hexabromocyclododecane (HBCDD) Content	See Test Results
4.	Phthalate Content (As requested by Client)	See Test Results
5.	US California Proposition 65 – Bisphenol A (BPA) Content	See Test Results
6.	Halogen Content	See Test Results
7.	Element Analysis (As requested by Client)	See Test Results
8.	Flame Retardant Content (As requested by Client)	See Test Results
9.	PVC Identification	See Test Results
10.	Persistent, Bioaccumulative, and Toxic (PBT) Chemicals under US EPA Toxic Substances Control Act (TSCA) Section 6(h)	PASS
11.	PFAS target analysis [EU + Switzerland Restricted PFAS	PASS

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Test Report

No. 5176412-CH01-R2

Date: May 30, 2024

Page 2 of 23

Signed for and on behalf of SGS North America, Inc.

Prepared By:

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 3 of 23

1. RoHS Directive (EU) 2015/863 amending Annex II to Directive 2011/65/EU

Test Item(s):	Unit	Test Method	Results	MDL	Limit
Cadmium (Cd)	mg/kg	With reference to IEC 62321-5:2013	ND	2	100
Lead (Pb)	mg/kg	(Determination of Cd and Pb by ICP-OES and /or ICP-MS)	ND	2	1000
Mercury (Hg)	mg/kg	With reference to IEC		2	1000
Hexavalent Chromium (CrVI)	mg/kg	With reference to IEC		8	1000
Sum of PBBs	mg/kg		ND	-	1000
Monobromobiphenyl	mg/kg		ND	5	-
Dibromobiphenyl	mg/kg		ND	5	-
Tribromobiphenyl	mg/kg		ND	5	-
Tetrabromobiphenyl	mg/kg		ND	5	-
Pentabromobiphenyl	mg/kg		ND	5	-
Hexabromobiphenyl	mg/kg		ND	5	-
Heptabromobiphenyl	mg/kg		ND	5	-
Octabromobiphenyl	mg/kg		ND	5	-
Nonabromobiphenyl	mg/kg	With reference to IEC	ND	5	-
Decabromobiphenyl	mg/kg	62321-6:2015	ND	5	-
Sum of PBDEs	mg/kg	(Determination of PBB and	ND	1	1000
Monobromodiphenyl ether	mg/kg	PBDE by GC-MS)	ND	5	-
Dibromodiphenyl ether	mg/kg		ND	5	-
Tribromodiphenyl ether	mg/kg		ND	5	-
Tetrabromodiphenyl ether	mg/kg		ND	5	-
Pentabromodiphenyl ether	mg/kg		ND	5	-
Hexabromodiphenyl ether	mg/kg		ND	5	-
Heptabromodiphenyl ether	mg/kg		ND	5	-
Octabromodiphenyl ether	mg/kg		ND	5	-
Nonabromodiphenyl ether	mg/kg		ND	5	-
Decabromodiphenyl ether	mg/kg		ND	5	-
Bis (2-ethylhexyl) Phthalate (DEHP)	mg/kg	IEC 62321-8:2017	ND	50	1000
Butyl Benzyl Phthalate (BBP)	mg/kg	(Determination of DEHP,	ND	50	1000
Dibutyl Phthalate (DBP)	mg/kg	BBP, DBP and DIBP by	ND	50	1000
Diisobutyl Phthalate (DIBP)	mg/kg	GC-MS)	ND	50	1000
Conclusion	/	/	PASS	/	/

Sample Description:

1. Nickel Sulfamate Solution

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 4 of 23

Note:

- (a) mg/kg = ppm; 0.1wt% = 1000ppm
- (b) ND= not detected
- (c) MDL = Method Detection Limit
- (d) -= not regulated
- (e) * = Total Chromium analysis by ICP-MS and/or ICP-OES was not detected in submitted sample. Therefore, Hexavalent Chromium determination using UV-Visible Spectroscopy was not performed.
- (f) IEC 62321 series is equivalent to EN 62321 series http://www.cenelec.eu/dyn/www/f?p=104:30:1742232870351101::::FSP ORG ID,FSP LANG ID: 1258637,25

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 5 of 23

2. Organotin Content

Test Method: With reference to ISO 17353. Analysis was conducted by GC-MS.

Organotin	Results (% by Weight of Tin) 1	Recommended Max. Limit (% by Weight of Tin)
Triphenyltin (TPhT) calculated as tin	ND	
Tricyclohexyltin (TCyT) calculated as tin	ND	
Total	ND	0.1
Conclusion	PASS	

Organotin	Results (% by Weight of Tin) 1	Recommended Max. Limit (% by Weight of Tin)
Dibutyltin (DBT) calculated as tin	ND	0.1
Dioctyltin (DOT) calculated as tin	ND	0.1
n-butyltin trichloride (MBT)* calculated as tin	ND	
Tetra-n-butyltin (TeBT)* calculated as tin	ND	
n-Octyltin trichloride (MOT)* calculated as tin	ND	
Diphenyltin (DPhT)* calculated as tin	ND	
Monophenyltin (MPhT)* calculated as tin	ND	
Conclusion	PASS	

Sample Description:

1. Nickel Sulfamate Solution

Note: 1. % = percentage by weight

2.1% = 10000 ppm (mg/kg)

3. ND = Not Detected, reported when the reading is less than the reporting limit value.

Remark: Recommended Max Limit with reference to Entry 20 of Regulation (EC) No 276-

2010 amending Annex XVII of REACH Regulation (EC) No 1907/2006

*client's request test

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 6 of 23

3. Hexabromocyclododecane (HBCDD) Content

Test Method: In-House test method. Analysis performed by GC-MS.

Test Item		Result (mg/kg)	Detection Limit
restitem		1	(mg/kg)
Hexabromocyclododecane	(HBCDD)	ND	5

Sample Description:

1. Nickel Sulfamate Solution

Note: 1. mg/kg = milligram per kilogram

2. mg/kg = ppm

3.1% = 10000 mg/kg (ppm)

4. ND = Not Detected, reported when the reading is less than the reporting limit value.

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 7 of 23

4. Phthalate Content (As requested by Client)

Test Method: With reference to CPSC-CH-C1001-09.4 and/or SGS In-House Method. Analysis was performed by GC-MS.

Phthalates	CAS No.	Results (ppm)	Reporting Limit (ppm)	Permissible Limit (ppm)
Dibutyl Phthalate (DBP)	84-74-2	ND	150	1000
Benzylbutyl Phthalate (BBP)	85-68-7	ND	150	1000
Bis-(2-ethylhexyl) Phthalate (DEHP)	117-81-7	ND	150	1000
Diisononyl Phthalate (DINP)	28553-12-0 / 68515-49-1	ND	150	1000
Diisobutyl Phthalate (DIBP)	84-69-5	ND	150	1000
Di-n-hexyl Phthalate (DnHP)	84-75-3	ND	150	1000
Diisodecyl Phthalate (DIDP)	26761-40-0 / 68515-49-1	ND	150	1000
Di-n-octyl Phthalate (DNOP)	117-84-0	ND	150	1000
Conclusion		PASS		

Sample Description:

1. Nickel Sulfamate Solution

Note: 1. ppm = parts per million

2. mg/kg = ppm

3. 1% = 10000 ppm (mg/kg)

4. ND = Not Detected

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 8 of 23

5. US California Proposition 65 - Bisphenol A (BPA) Content

Test Method: Solvent extraction followed by analysis with High Performance Liquid Chromatography - Mass Selective Detector (HPLC-MSD).

Test Item	CAS No.	Result (ppm)	Reporting
rest item	OAO NO.	1	Limit (ppm)
Bisphenol A (BPA)	80-05-07	ND	0.1
Conclusion			

Sample Description:

1. Nickel Sulfamate Solution

Note: 1. ppm = parts per million

2. mg/kg = ppm

3. 1% = 10000 ppm (mg/kg)

4. ND = Not Detected, reported when the reading is less than the reporting limit value.

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 9 of 23

6. Halogen Content

Test Method(s): With reference to IEC 62321-3-2:2020 "Determination of certain substances in electrotechnical products - Part 3-2: Screening - Fluorine, bromine and chlorine in polymer and electronics by combustion-ion chromatography (C-IC), and/or with reference to BS EN 14582:2016 - Analysis was performed by ion chromatography.

Toot Itom(a)	I Imi4	Results (ppm)	Reporting Limit
Test Item(s):	Unit	1	(ppm)
Fluorine (F)	mg/kg	ND	50
Chlorine (CI)	mg/kg	ND	50
Bromine (Br)	mg/kg	ND	50
lodine (I)	mg/kg	ND	50

Sample Description:

1. Nickel Sulfamate Solution

1. ppm = parts per million Note:

2. mg/kg = ppm

3. 1% = 10000 ppm (mg/kg)

4. ND = Not Detected, reported when the reading is less than the reporting limit value.

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 10 of 23

7. Element Analysis (As requested by Client)

Method: Analysis performed by ICP-MS.

Test Item		Result (mg/kg)	Detection Limit	
		1	(mg/kg)	
Beryllium	(Be)	ND	2	
Iron	(Fe)	ND	10	
Arsenic	(As)	ND	2	
Antimony	(Sb)	ND	2	

Sample Description:

1. Nickel Sulfamate Solution

1. mg/kg = milligram per kilogram Note:

2. mg/kg = ppm

3.1% = 10000 mg/kg (ppm)

4. ND = Not Detected

5. TBD = To Be Determined

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 11 of 23

8. Flame Retardant Content (As requested by Client)

Test Method: In-house Method. Analysis was performed by GC-MS or LC-MS.

Flame Retardants	Results (ppm)	Reporting Limit	Client Limit
riame iveraruants	1	(ppm)	(ppm)
Tetrabromobisphenol A (TBBPA)	ND	5	25
Comment	PASS		

Sample Description:

1. Nickel Sulfamate Solution

1. mg/kg = milligram per kilogram Note:

2. mg/kg = ppm

3. 1% = 10000 mg/kg (ppm)

4. ND = Not Detected, reported when the reading is less than the reporting limit value.

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 12 of 23

9. PVC Identification

a) Beilstein Test:

Test Method: PVC: With reference to Health Canada - Product Safety Bureau Reference Manual Book5 -Laboratory Policies and Procedures, Method C-28 "Beilstein Test".

Test Results:

Test Items	PVC Result
1. Nickel Sulfamate Solution	Negative (No Green Flame)

b) FTIR Test Results:

Test Method: Testing was performed using Fourier Transform Infrared Spectroscopy (FTIR) analytical instrumentation.

Sample	Identification	
1. Nickel Sulfamate Solution	PVC Not Present	

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 13 of 23

10. Persistent, Bioaccumulative, and Toxic (PBT) Chemicals under US EPA Toxic Substances Control Act (TSCA) Section 6(h)

Test Method: With reference to US EPA Method 3550C:2007, analysis was performed by GC-MS.

Test Item	CAS-No.	Results (mg/kg) 1	Report Limit (mg/kg)	Limit (mg/kg)
Decabromodiphenyl ether (Deca-BDE)	1163-19-5	ND	5	Prohibited
Isopropylated triphenyl phosphate (PIP 3:1)	68937-41-7	ND	5	Prohibited
2,4,6-Tris(tert-butyl)phenol (2,4,6-TTBP)	732-26-3	ND	5	3000
Hexachlorobutadiene (HCBD)	87-68-3	ND	5	Prohibited
Pentachlorothiophenol (PCTP)	133-49-3	ND	5	10000
Conclusion		PASS		

Sample Description:

1. Nickel Sulfamate Solution

1. mg/kg = milligram per kilogram Note:

- 2. mg/kg = ppm
- 3. 1% = 10000 mg/kg (ppm)
- 4. ND = Not Detected, reported when the reading is less than the reporting limit value.

The regulation is available at the following link.

https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/persistent-bioaccumulativeand-toxic-pbt-chemicals-under

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 14 of 23

11. Perfluorinated and Polyfluorinated Chemicals (PFAS) - All Materials

With reference to EN ISO 23702-1:2023, EN 17681-1:2022 and EN 17681-2:2022. Test Method:

Analysis was conducted by HPLC-MS/MS and GC-MS.

Test Item(s)	CAS-No.	Result (mg/kg)
		1
PFOS, its salts and related		
compounds		
Perfluorooctanesulfonic acid (PFOS), its salts#	1763-23-1	ND
N-ethylperfluoro-1-octanesulfonamide (N-EtFOSA)	4151-50-2	ND
N-methylperfluoro-1-octanesulfonamide (N-MeFOSA)	31506-32-8	ND
2-(N-ethylperfluoro-1-octanesulfonamido)-ethanol (N-EtFOSE)	1691-99-2	ND
2-(N-methylperfluoro- 1- octanesulfonamido) -ethanol (N- MeFOSE)	24448-09-7	ND
Perfluorooctane sulfonamide (PFOSA), its salts#	754-91-6	ND
Sum of PFOS, its salts and related compounds	-	ND

Test Item(s)	CAS-No.	Result (mg/kg)
. ,		1
PFOA, its salts		
Perfluorooctanoic acid (PFOA), its salts#	335-67-1	ND
PFOA-related compounds		
1H,1H,2H,2H-Perfluorodecanesulfonic acid (8:2 FTS) [®] its salts [#]	39108-34-4	ND
Methyl perfluorooctanoate (Me-PFOA)	376-27-2	ND
Ethyl perfluorooctanoate (Et-PFOA)	3108-24-5	ND
1H,1H,2H,2H-Perfluorodecyl acrylate (8:2 FTA) [@]	27905-45-9	ND
1H,1H,2H,2H-Perfluorodecyl methacrylate (8:2 FTMA) [®]	1996-88-9	ND
Perfluoro-1-iodooctane (PFOI)	507-63-1	ND
2H,2H Perfluorodecane Acid (H ₂ PFDA / 8:2 FTCA) [®] , its salts [#]	27854-31-5	ND
1H,1H,2H,2H-Perfluorodecan-1-ol (8:2 FTOH) [@]	678-39-7	ND
1-lodo-1H,1H,2H,2H-perfluorodecane (8:2 FTI) [@]	2043-53-0	ND
1H,1H,2H,2H- Perfluorodecyltriethoxysilane (8:2 FTSi(OC ₂ H ₅) ₃) [@]	101947-16- 4	ND

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 15 of 23

bis(3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10- heptadecafluorodecyl) hydrogen phosphate (8:2 diPAP) [®] its salts [#]	678-41-1	ND
2H,2H,3H,3H-Perfluoroundecanoic Acid (H ₄ PFUnDA / 8:3 FTCA) [®] its salts [#]	34598-33-9	ND
1H,1H,2H-Heptadecafluoro-1-decene (PFDE) [®]	21652-58-4	ND
3-Perfluoroheptyl propanoic acid (7:3 FTCA)	812-70-4	ND
Sum of PFOA-related compounds	-	ND

Test Item(s)	CAS-No.	Result (mg/kg)
()		1
C9-C14 PFCA, its salts		
Perfluorononane Acid (PFNA), its salts#	375-95-1	ND
Perfluorodecane Acid (PFDA), its salts#	335-76-2	ND
Perfluoroundecanoic Acid (PFUnDA), its salts#	2058-94-8	ND
Perfluorododecanoic Acid (PFDoDA), its salts#	307-55-1	ND
Perfluorotridecanoic Acid (PFTrDA), its salts#	72629-94-8	ND
Perfluorotetradecanoic Acid (PFTDA)	376-06-7	ND
Perfluoro-3,7-dimethyloctanoic Acid (PF-3,7-DMOA)	172155-07- 6	ND
Sum of C9-C14 PFCA, its salts	-	ND
C9-C14 PFCA-related substances		
Perfluorodecane sulfonic Acid (PFDS), its salts#	335-77-3	ND
1H,1H,2H,2H-Perfluoro-1-dodecanol (10:2 FTOH)	865-86-1	ND
1H,1H,2H,2H-Perfluorododecylacrylate (10:2 FTA)	17741-60-5	ND
1H,1H,2H,2H-Perfluorododecyl methacrylate (10:2 FTMA)	2144-54-9	ND
1H,1H,2H,2H-perfluorotetradecan-1-ol (12:2 FTOH)	39239-77-5	ND
1H,1H,2H,2H-Perfluorododecane sulfonic acid (10:2 FTS)	120226-60- 0	ND
1H,1H,2H,2H-Perfluorododecyl iodide (10:2 FTI)	2043-54-1	ND
1H,1H,2H,2H-Perfluorotetradecyl iodide (12:2 FTI)	30046-31-2	ND
Perfluorononane sulfonic acid (PFNS), its salts#	68259-12-1	ND
Perfluoroundecane sulfonic acid (PFUnDS)	749786-16- 1 / 441296- 91-9 (anion)	ND

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 16 of 23

Perfluorododecane sulfonic acid (PFDoDS), its salts#	79780-39-5	ND
Perfluorotridecane sulfonic acid (PFTrDS), its salts#	791563-89- 8	ND
10:2 Fluortelomerphosphatediester (10:2 diPAP)	1895-26-7	ND
Perfluorodecyl iodide (PFDI)	423-62-1	ND
Perfluorododecyl iodide (PFDoDI)	307-60-8	ND
1H,1H,2H,2H-Perfluorodecanesulfonic acid (8:2 FTS) [@]	39108-34-4	ND
1H,1H,2H,2H-Perfluorodecyl acrylate (8:2 FTA) [@]	27905-45-9	ND
1H,1H,2H,2H-Perfluorodecyl methacrylate (8:2 FTMA) [@]	1996-88-9	ND
2H,2H Perfluorodecane Acid (H ₂ PFDA / 8:2 FTCA) [@] , its salts [#]	27854-31-5	ND
1H,1H,2H,2H-Perfluorodecan-1-ol (8:2 FTOH) [@]	678-39-7	ND
1-lodo-1H,1H,2H,2H-perfluorodecane (8:2 FTI) [@]	2043-53-0	ND
1H,1H,2H,2H- Perfluorodecyltriethoxysilane (8:2 FTSi(OC ₂ H ₅) ₃) [®]	101947-16- 4	ND
bis(3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl) hydrogen phosphate (8:2 diPAP)# [@]	678-41-1	ND
2H,2H,3H,3H-Perfluoroundecanoic Acid (H ₄ PFUnDA / 8:3 FTCA) ^{# @}	34598-33-9	ND
1H,1H,2H-Heptadecafluoro-1-decene (PFDE) [®]	21652-58-4	ND
Sum of C9-C14-related substances	-	ND
Conclusion		PASS

Sample Description:

Nickel Sulfamate Solution

Note: n.d. = not detected

> @ PFAS classified as both PFOA-related compounds and C9-C14 PFCA-related substances

[#] Substances refer to its salts/derivative listed in Appendix 1

Substances refer to its possible sources listed in Appendix 2

^{^=}Compound is hydrolysed and releases related PFAS substances when extracted by methanol/sodium hydroxide solution

^{* =} Exceeds the limit

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Test Report Date: May 30, 2024 No. 5176412-CH01-R2 Page 17 of 23

Reporting limit:

PFOS, its salts and related compounds = 1 mg/kg

PFOA, its salts = 10 ppb = 0.01 mg/kg

PFOA-related compounds = 100 ppb (each) = 0.10 mg/kg (each), except 8:2

FTOH=200 ppb=0.20 mg/kg

C9-C14 PFCA, their salts = 10 ppb (each) = 0.01 mg/kg (each)

C9-C14 PFCA-related substances = 100 ppb (each) = 0.10 mg/kg (each), except 8:2 FTOH=200 ppb=0.20 mg/kg,10:2 FTOH=200 ppb=0.20 mg/kg, 12:2 FTOH=200 ppb=0.20 mg/kg

Requirement:

PFOS, its salts and related compounds

Textile or other materials 1 mg/kg

Recommended requirement with reference to commission regulation (EU) 2019/1021; and Switzerland ORRChem Annex 1.16 of Art. 3 in SR 814.81

25 ppb (0.025 mg/kg) PFOA, its salts PFOA-related compounds 1 mg/kg (each or total) Recommended requirement with reference to Regulation (EU) 2020/784 amending Annex I to Regulation (EU) 2019/1021; and Switzerland ORRChem Annex 1.16 of Art. 3 in SR 814.81

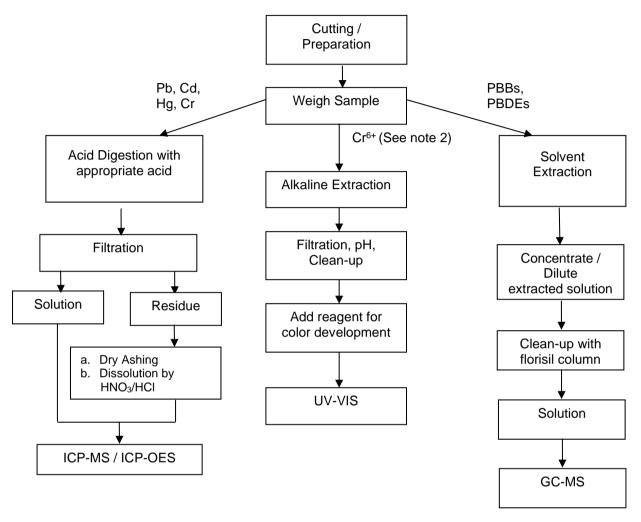
C9-C14 PFCA, their salts 25 ppb (0.025 mg/kg) (total) C9-C14 PFCA-related substances 260 ppb (0.26 mg/kg) (total) Recommended requirement with reference to commission regulation (EU) 2021/1297 amending Annex XVII to Regulation (EC) 1907/2006. (Effective date: 25th February 2023); and Switzerland ORRChem Annex 1.16 of Art. 3 in SR 814.81

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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 18 of 23

Flowchart for RoHS:



Note: 1. The Cr, Cd, Pb and Hg contents test on polymeric samples were dissolved totally by preconditioning method according to above flow chart.

2. Cr⁶⁺ is performed only when total Cr is detected

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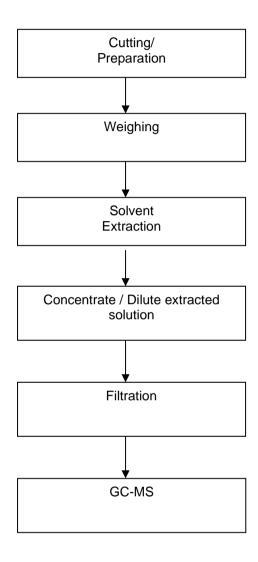
Test Report

No. 5176412-CH01-R2

Date: May 30, 2024

Page 19 of 23

Flowchart for Phthalates



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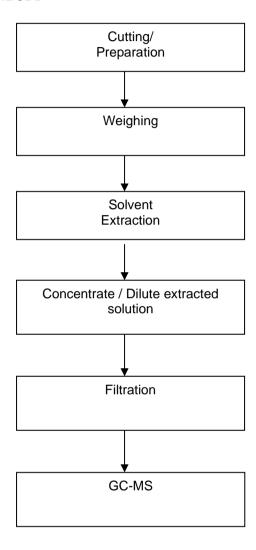
Test Report

No. 5176412-CH01-R2

Date: May 30, 2024

Page 20 of 23

Flowchart for Phthalates/HBCDD

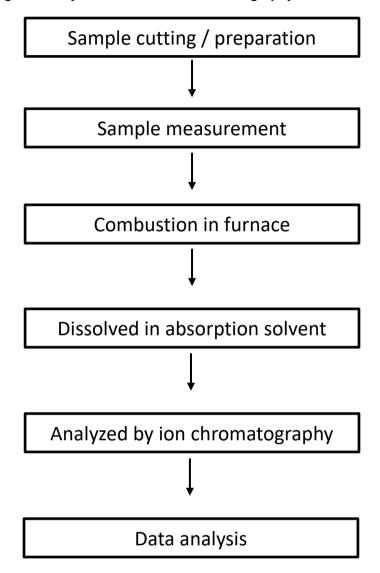


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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 21 of 23

Flow Chart of Halogen Test by Combustion Ion Chromatography:

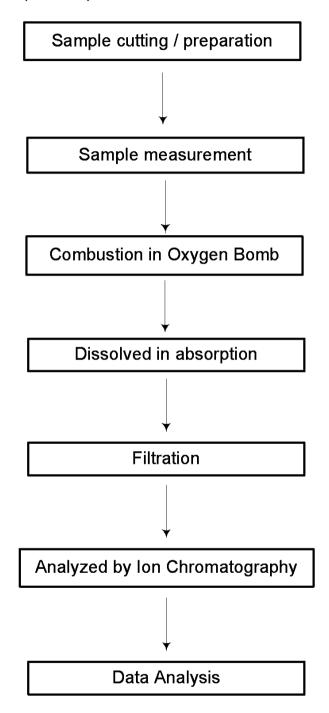


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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 22 of 23

Halogen Testing Flow Chart (EN 14582):

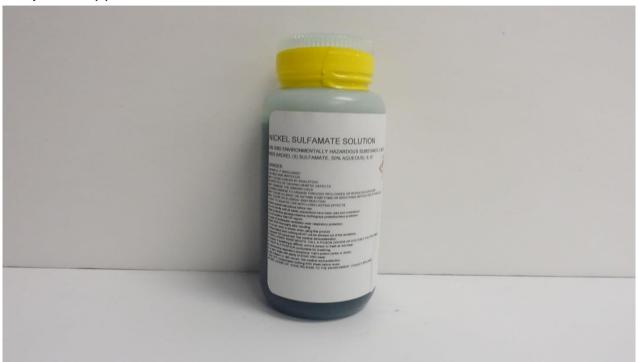


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Test Report No. 5176412-CH01-R2 Date: May 30, 2024 Page 23 of 23

Sample Photo(s):



SGS authenticates the photo(s) on the original report only

*** End of Report ***

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