



Verification Report

No. HKGEC25001106408

Date : Sep 11, 2025

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Client Name: RUBADUE WIRE CO., INC.

Client Address: 5610 BOEING DRIVE LOVELAND, COLORADO 80538 USA

Sample Name : TCA
Colour : VARIOUS
Country of Origin : USA

The above sample(s) and information were provided by the client.

SGS Job No. : 5623460
Reference No. : 2508108
Sample Receiving Date : Aug 25, 2025
Verification Period : Aug 25, 2025 – Sep 10, 2025
Verification Requested : With reference to GB/T 26572-2011 Requirement of concentration limits for certain restricted substances in electrical and electronic products.
Verification Method(s) : Please refer to next page(s).
Verification Result(s) : Please refer to next page(s).

Test Result Summary

Test Items	Conclusion
GB/T 26572-2011 "Requirement of concentration limits for certain restricted substances in electrical and electronic products" and its amendment No.1 and the requirement of Exemption List for the Restriction of Hazardous Substances of the Standard Achieving Management Catalogue - Lead, Mercury, Cadmium, Hexavalent chromium, Polybrominated biphenyls (PBB), Polybrominated diphenyl ethers (PBDE), Dibutyl phthalate (DBP), Diisobutyl phthalate (DIBP), Butyl benzyl phthalate (BBP) and Bis(2-ethylhexyl) phthalate (DEHP)	PASS

Signed for and on behalf of
SGS Hong Kong Limited

Lam Ka Yung, Allen
Approved Signatory

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Verification Methods:

1. Disassembly and disjointment were performed for the submitted samples.
2. Tests were performed for the samples indicated by the photos in this report
 - (1) With reference to GB/T 39560.301-2020, Screening by EDXRF spectroscopy. (Decision Rule; please refer to appendix 1: Category 9).
 - (2) Wet chemical test method: With reference to GB/T 39560.4-2021 (Decision Rule: please refer to appendix 1: Category 6), GB/T 39560.5-2021 (Decision Rule: please refer to appendix 1: Category 6), GB/T 39560.701-2020 (Decision Rule: please refer to appendix 1: Category 4), GB/T 39560.702-2021 (Decision Rule: please refer to appendix 1: Category 6), GB/T 39560.6-2020 (Decision Rule: please refer to appendix 1: Category 6) and GB/T 39560.8-2021 (Decision Rule: please refer to appendix 1: Category 6), analyzed by ICP-OES/AAS, UV-Vis and GC-MS.

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Verification Part Description:

SN ID	Sample No	SGS Sample ID	Description
SN1	A1	HKG25-0011064-0001.C001	Silvery metal plating - Wire(Tin-Plated Copper Wire)
SN2	A2	HKG25-0011064-0001.C002	Coppery metal - Wire(Tin-Plated Copper Wire)
SN3	A3	HKG25-0011064-0001.C003	Silvery metal plating - Wire
SN4	A4	HKG25-0011064-0001.C004	Coppery metal - Wire
SN5	A5	HKG25-0011064-0001.C005	Red metal plating - Wire
SN6	A6	HKG25-0011064-0001.C006	Coppery metal - Wire
SN7	A7	HKG25-0011064-0001.C007	Coppery metal - Wire
SN8	A32	HKG25-0011064-0001.C032	Translucent plastic pellet
SN9	A33	HKG25-0011064-0001.C033	Grey plastic pellet
SN10	A34	HKG25-0011064-0001.C034	White plastic pellet
SN11	A35	HKG25-0011064-0001.C035	Orange plastic pellet
SN12	A36	HKG25-0011064-0001.C036	Blue plastic pellet

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Verification Results:

In accordance with the result of material risk assessment, the following disjointed parts in the submitted sample have been verified. (Unless otherwise specified, the unit is mg/kg).

Test Item(s)	A1	A2	A3	A4	A5	A6	A7	A32
Pb	BL	BL	BL	BL	BL	BL	BL	BL
Cd	BL	BL	BL	BL	BL	BL	BL	BL
Hg	BL	BL	BL	BL	BL	BL	BL	BL
Cr(VI) ▼	BL	BL	BL	BL	BL	BL	BL	BL
PBBs	---	---	---	---	---	---	---	BL
PBDEs	---	---	---	---	---	---	---	BL
DBP	---	---	---	---	---	---	---	BL
BBP	---	---	---	---	---	---	---	BL
DEHP	---	---	---	---	---	---	---	BL
DIBP	---	---	---	---	---	---	---	BL
Conclusion	PASS	PASS	PASS	PASS	PASS	PASS	PASS	PASS

Test Item(s)	A33	A34	A35	A36
Pb	BL	BL	BL	BL
Cd	BL	BL	BL	BL
Hg	BL	BL	BL	BL
Cr(VI) ▼	BL	BL	ND	BL
PBBs	BL	BL	BL	BL
PBDEs	BL	BL	BL	BL
DBP	BL	BL	BL	BL
BBP	BL	BL	BL	BL
DEHP	BL	BL	BL	BL
DIBP	BL	BL	BL	BL
Conclusion	PASS	PASS	PASS	PASS

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Notes:

(1) Interpretation of screening results by X-ray fluorescence spectrometry (XRF):

(a) Screening limits in mg/kg for regulated elements in various matrices according to GB/T 39560.301-2020 Table A.2.

Element	Polymer	Metal	Composite Materials
Cd	$BL \leq (70-3\sigma) < X < (130+3\sigma) \leq OL$	$BL \leq (70-3\sigma) < X < (130+3\sigma) \leq OL$	$LOD < X < (150+3\sigma) \leq OL$
Pb	$BL \leq (700-3\sigma) < X < (1300+3\sigma) \leq OL$	$BL \leq (700-3\sigma) < X < (1300+3\sigma) \leq OL$	$BL \leq (500-3\sigma) < X < (1500+3\sigma) \leq OL$
Hg	$BL \leq (700-3\sigma) < X < (1300+3\sigma) \leq OL$	$BL \leq (700-3\sigma) < X < (1300+3\sigma) \leq OL$	$BL \leq (500-3\sigma) < X < (1500+3\sigma) \leq OL$
Br	$BL \leq (300-3\sigma) < X$	Not applicable	$BL \leq (250-3\sigma) < X$
Cr	$BL \leq (700-3\sigma) < X$	$BL \leq (700-3\sigma) < X$	$BL \leq (500-3\sigma) < X$

(b) If the maximum allowed level restricts PBB/PBDE and Cr(VI) rather than Br and Cr, the exceptions are the XRF determinations of Br and Cr. If the quantitative results for the elements Br and/or are higher than the limit (for Br calculated based on the stoichiometry of Br in the most common congeners of PBB/PBDE), the sample is "inconclusive".

(c) Results are obtained by EDXRF for primary screening, LOD = Limit of Detection, BL = Below Limit, OL = Over Limit, IN (The symbol X marks the region)= Inconclusive, where further investigation is necessary, and further chemical testing by ICP-OES (for Cd, Pb, Hg), UV-Vis (for Cr(VI)) and GC-MS (for PBBs/PBDEs) are recommended to be performed.

(d) The EDXRF screening test for RoHS elements – The reading may be different to the actual content in the sample be of non-uniformity composition.

(2) Screening results of Phthalates (PHTH) are for primary screening, and further chemical testing by GC-MS (for DBP, BBP, DEHP and DIBP) are recommended to be performed if the concentration exceeds the below warning value (unit: mg/kg).

Test Items	CAS No.	Polymer/ Composite Materials
Dibutyl Phthalate (DBP)	84-74-2	$BL \leq 600 < X$
Benzylbutyl Phthalate (BBP)	85-68-7	$BL \leq 600 < X$
Bis(2-ethylhexyl) Phthalate (DEHP)	117-81-7	$BL \leq 600 < X$
Diisobutyl Phthalate (DIBP)	84-69-5	$BL \leq 600 < X$

(3) Interpretation of results by chemical tests:

(a) mg/kg = 0.0001%, MDL=Method detection Limit, ND = Not Detected (<MDL), --- = Not Applicable.

(b) Unit and MDL in wet chemical test

Test Items	Pb	Cd	Hg	DBP	BBP	DEHP	DIBP
Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
MDL	10	10	10	100	100	100	100

The MDL for single compound of PBBs and PBDEs is 100 mg/kg.
 MDL of Cr(VI) for polymer, composite and leather sample is 10 mg/kg.
 MDL of Cr(VI) for metal sample is 0.10µg/cm².

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(c) ▼ =Metal sample

- a. The sample is positive for Cr(VI) if the Cr(VI) concentration is greater than 0.13µg/cm².
The sample coating is considered to contain Cr(VI)
- b. The sample is negative for Cr(VI) if Cr(VI) is ND (concentration less than 0.10µg/cm²).
The coating is considered a non-Cr(VI) based coating
- c. The result between 0.10µg/cm² and 0.13µg/cm² is considered to be inconclusive
- unavoidable coating variations may influence the determination

Information on storage conditions and production date of the tested sample is unavailable and thus Cr(VI) results represent status of the sample at the time of testing.

- (4) GB/T 26572-2011 "Requirement of concentration limits for certain restricted substances in electrical and electronic products" and its amendment No.1 sets the maximum concentration values tolerated by weight in homogeneous materials as Cd: 0.01%, Pb/Hg/Cr(VI)/PBB/PBDE/DBP/DIBP/BBP/DEHP: 0.1%. Effective date: 2026.01.01.

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Appendix 1

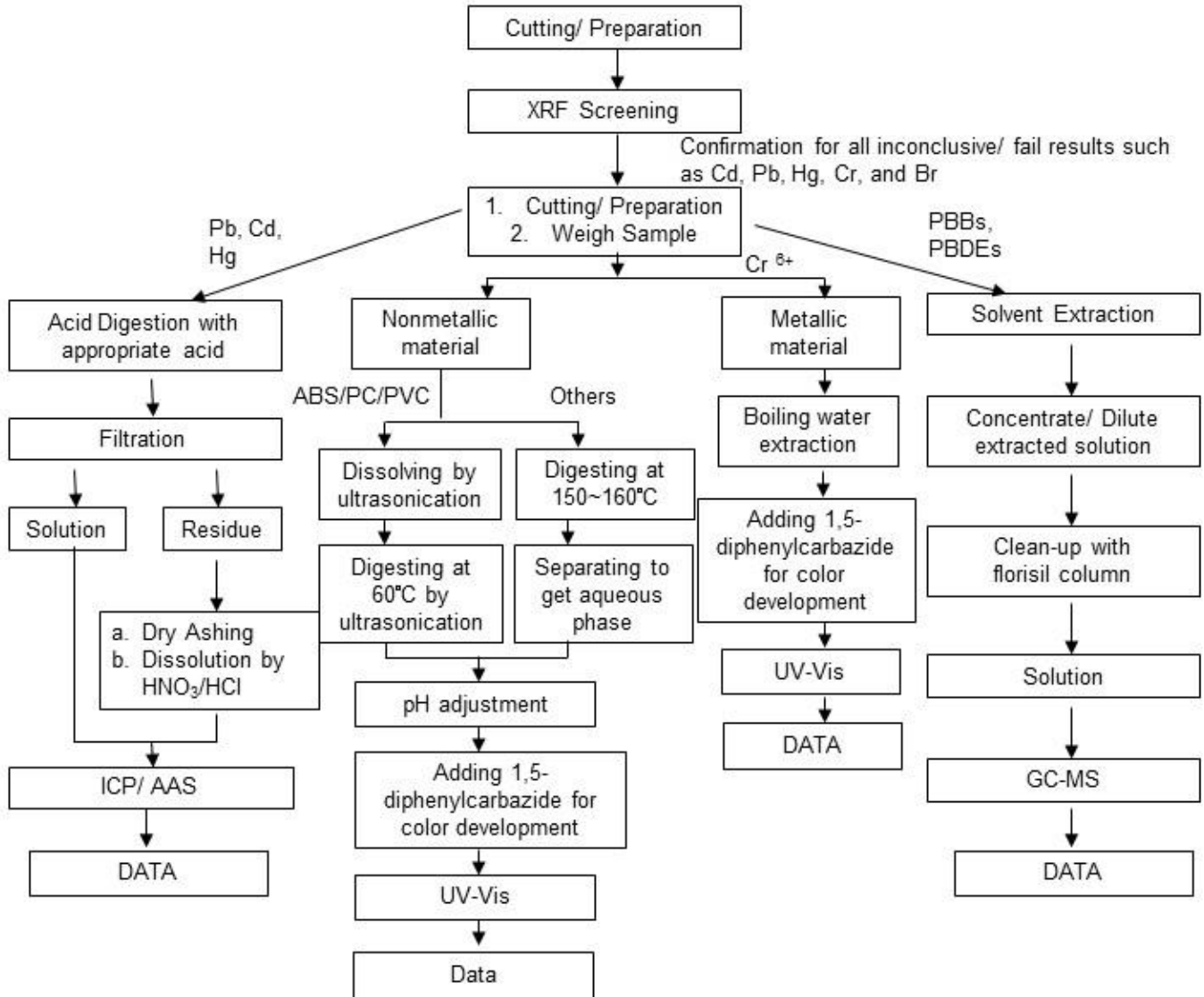
Category	Decision Rule Statement
1	The decision rule for conformity reporting is based on the non-binary statement with guard band (is equal to the expanded measurement uncertainty with a 95% coverage probability, $w = U95$) in ILAC-G8:09/2019 Clause 4.2.3. A. "Pass - the measured value is within (or below / above) the acceptance limit, where the acceptance limit is below / above to the guard band." or "Pass - The measured values were observed in tolerance at the points tested. The specific false accept risk is up to 2.5%." B. "Conditional Pass - The measured values were observed in tolerance at the points tested. However, a portion of the expanded measurement uncertainty intervals about one or more measured values exceeded / out of tolerance. When the measured result is close to the tolerance, the specific false accept risk is up to 50%." C. "Conditional Fail - One or more measured values were observed out of tolerance at the points tested. However, a portion of the expanded measurement uncertainty intervals about one or more measured values were in tolerance. When the measured result is close to the tolerance, the specific false reject risk is up to 50%." D. "Fail - the measured value is out of (or below / above) the tolerance limit added / subtracted to the guard band." or "Fail - One or more measured values were observed out of tolerance at the points tested". The specific false reject risk is up to 2.5%.
2	The decision rule for conformity reporting is based on EN 1811:2023: Reference test method for release of nickel from all post assemblies which are inserted into pierced parts of the human body and articles intended to come into direct and prolonged contact with the skin in Section 9.2 interpretation of results.
3	The decision rule for conformity reporting is based on the general consideration of simple acceptance as stated in ISO/IEC Guide 98-3: "Uncertainty of measurement - Part 3: Guide to the expression of uncertainty in measurement (GUM 1995)", and more specifically for analytical measurements to the EURACHEM/CITAC Guide 2012 "Quantifying Uncertainty in Analytical Measurement".
4	The decision rule for conformity reporting is according to the IEC 62321-7-1 Edition 1.0 2015-09 Section 7: Table 1 - (comparison to standard solutions and interpretation of result)
5	The decision rule for conformity reporting is according to the IEC 62321-3-1 Edition 1.0 2013-06 Annex A.3 interpretation of result.
6	The decision rule for conformity reporting is according to the GB/T 39560.701-2020 Section 7: Table 1 - (comparison to standard solutions and interpretation of result)
7	The decision rule for conformity reporting is according to the requested specification or standard (ASTM F963-23 section 4.3.5)
8	The decision rule for conformity reporting is according to the requested specification or standard (AS/NZS ISO 8124 Part 3 section 4.2)
9	The decision rule for conformity reporting is according to the GB/T 39560.301-2020 Annex A.3 interpretation of result
Remark	If the decision rule is not feasible to be used and the uncertainty of the result is able to be provided, the uncertainty range of the result will be shown in the report. Otherwise, only result will be shown in the report.

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Attachment:

RoHS Verification Testing Flow Chart



- Note : 1) Boiling water test method was also performed for Cr (VI) analysis in metal sample.
 2) The polymeric samples were dissolved totally by pre-conditioning method according to above flow chat for Cd, Pb and Hg contents analysis.

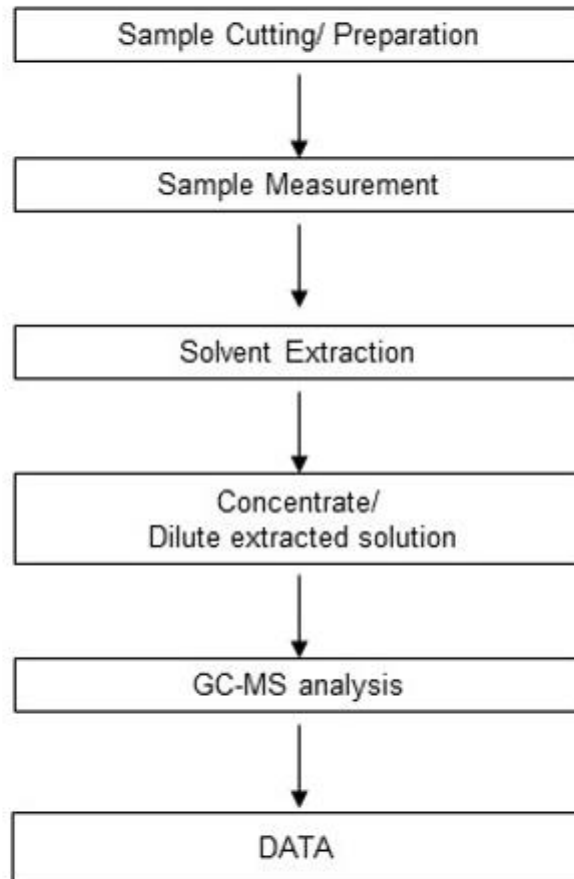
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Attachment:

Phthalates Testing Flow Chart

Method: IEC 62321-8:2017

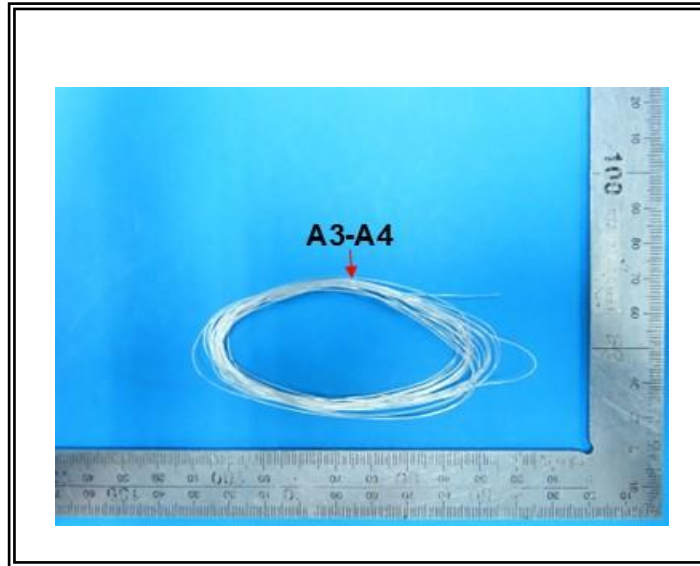
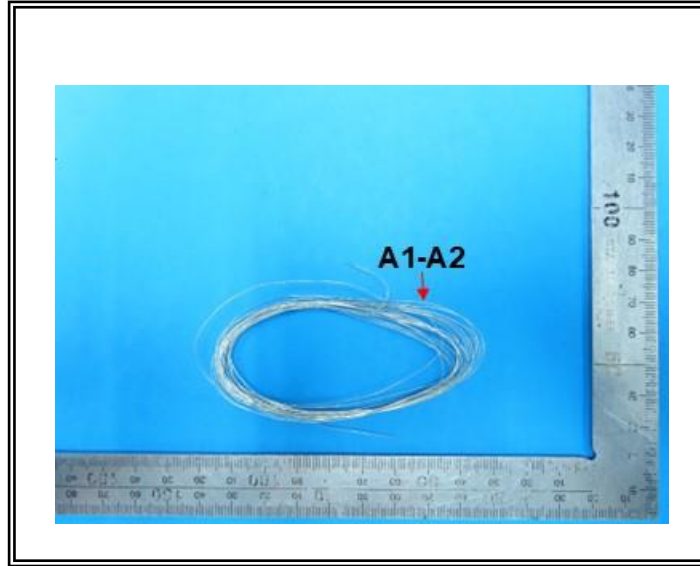


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Sample photo :

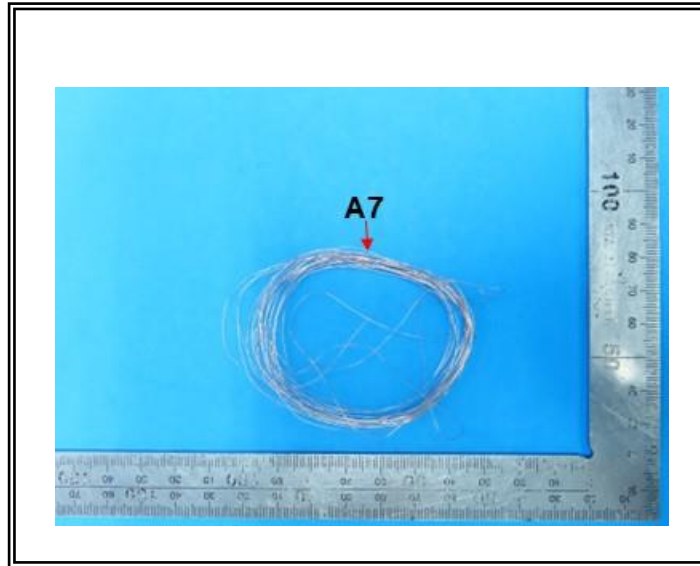
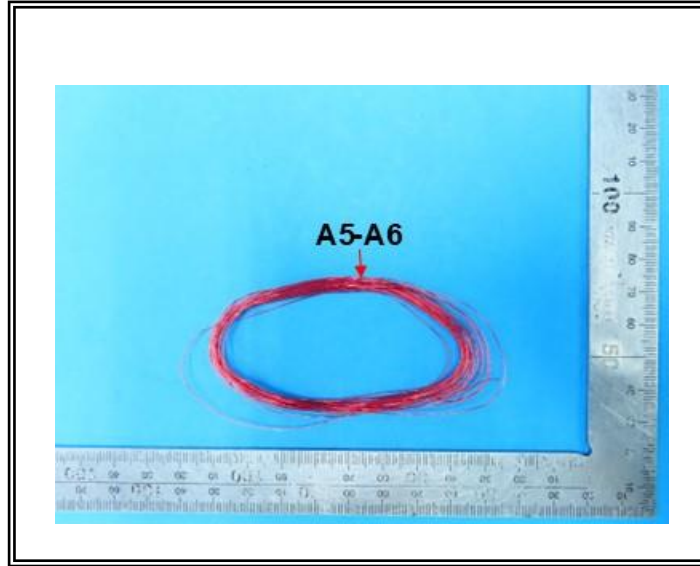


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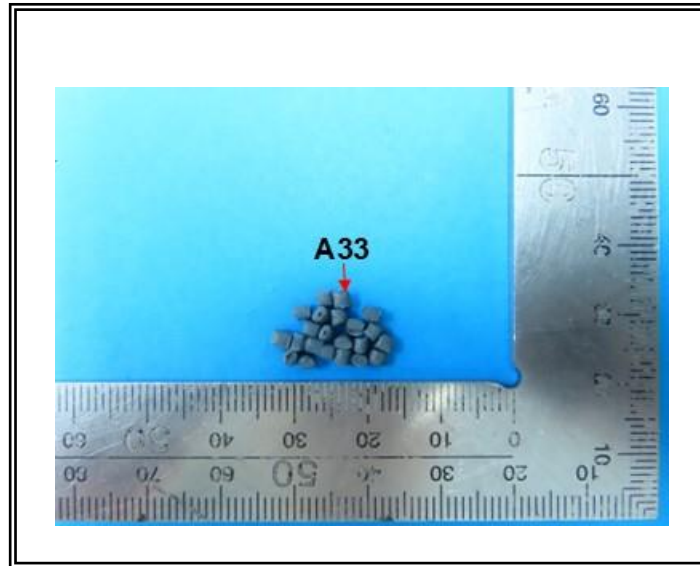
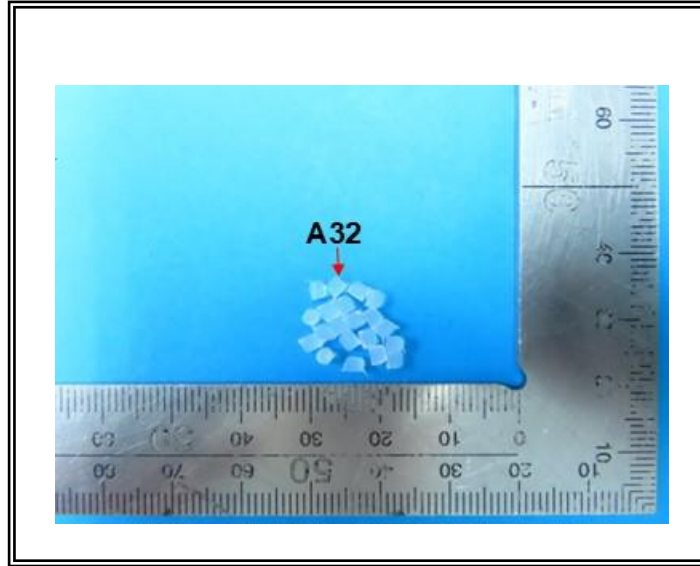


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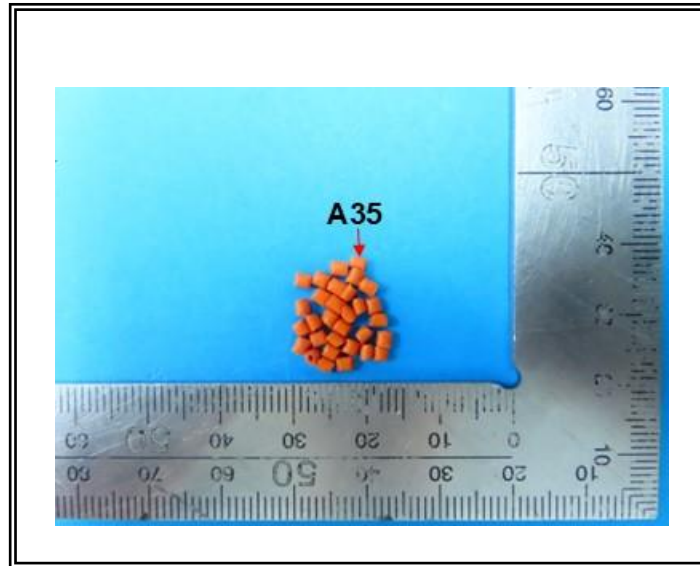
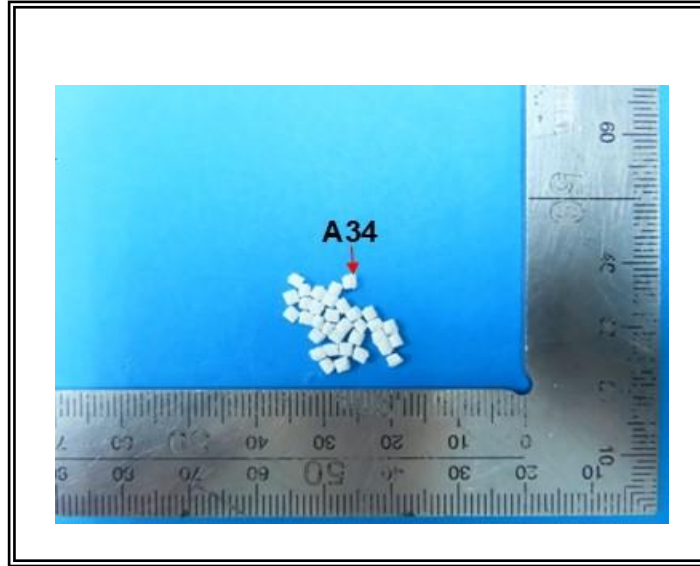
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Sample photo :



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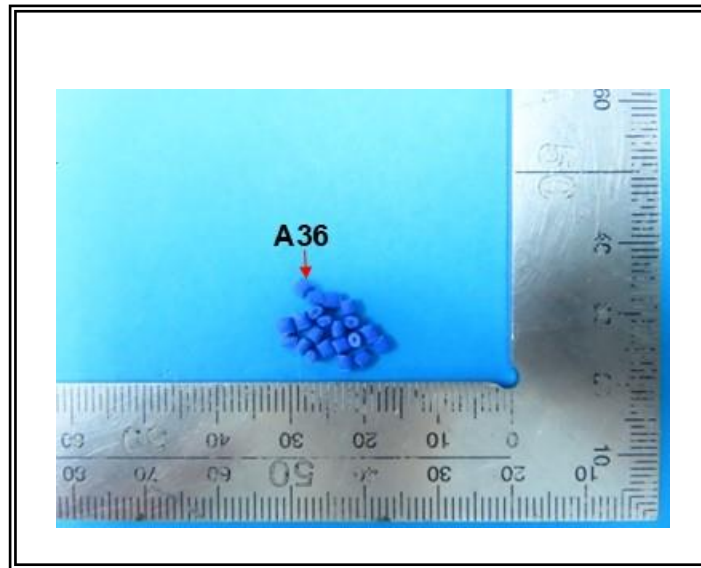
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