



Test Report

No.T32120300299TC

Date: SEP 15, 2021

Page 1 of 8

KOOZIE GROUP

14421 MYERLAKE CIRCLE CLEARWATER,
PINELLAS,FL 33760,UNITED STATES

The following samples were submitted and identified by/on behalf of the client as:

ROBUST PEN

Item No. : 55658
Manufacture Date : 2021
Test Request Form No. : 5241_HK
Shipment Order Number : 7137578
Country of Origin : CHINA
Country of Destination : CANADA, UNITED STATES
Sample Receiving Date : SEP 10, 2021
Testing Period : SEP 10, 2021 TO SEP 15, 2021

| Test Requested | | Conclusion |
|----------------|---|------------|
| 1. | CPSIA section 108 – Phthalates in the specified specimen(s) as listed | PASS |
| | US 16 CFR Part 1307 – Phthalates in the specified specimen(s) as listed | PASS |
| | US California Proposition 65 (County of Santa Clara Case No. 1-12-CV-230462 & Out-of-court settlement for Pens with vinyl/PVC charm toppers, Vinyl/PVC stationery products include but not limited to eraser and sharpener, pen, pencil cases, clipboards calculator and LED booklight) – Phthalates Content in the specified specimen(s) as listed | PASS |
| 2. | Title 16, Code of Federal Regulations, Chapter II - Consumer Products Safety Commission of U.S.A. - Part 1303 - Ban of Lead - Containing Paint and Certain Consumer Products Bearing Lead - Containing Paint – Lead Content in the specified specimen(s) as listed | PASS |

This document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx> and, for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com/en/Terms-and-Conditions/Terms-e-Documents.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.



| Test Requested | | Conclusion |
|----------------|--|------------|
| 3. | CPSIA section 101 - Total Lead content in the specified specimen(s) as listed | -- |
| 3.1 | CPSIA section 101(f) (1) – Lead in paint/similar surface coating material | PASS |
| 3.2 | CPSIA section 101(a) (2) – Lead in accessible substrate materials (Including Children’s Metal Jewelry) | PASS |
| 4. | US California Proposition 65 (County of Los Angeles Case No. BC479596 & Out-of-court Settlement for Vinyl/PVC stationery products include but not limited to eraser and sharpener, pen, pencil cases, clipboards calculator and LED booklight) – Lead Content in the specified specimen(s) as listed | PASS |
| 5. | Canada Consumer Product Safety Act (S.C. 2010, c. 21), Toys Regulations (SOR/2011-17) amended up to January 11, 2019 (Including amendments SOR/2012-71, SOR/2016-195, SOR/2016-302 and SOR/2018-138) - Section 23 (a) and Section 23 (c) - Lead and Mercury in surface coating material in the specified specimen(s) as listed | PASS |

***** FOR FURTHER DETAILS, PLEASE REFER TO THE FOLLOWING PAGE(S) *****

Signed for and on behalf of
SGS Hong Kong Ltd.



To Man Wah, Po
Technical Manager

This document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx> and, for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com/en/Terms-and-Conditions/Terms-e-Documents.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company’s findings at the time of its intervention only and within the limits of Client’s instructions, if any. The Company’s sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.

Test Results:

1. Phthalates Content

Method: With reference to CPSC-CH-C1001-09.4
 Analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS)

Accessible Materials can be placed in the Mouth

| Test Item(s) | CAS No. | Result(s) (%) | MDL (%) |
|-------------------------------------|--------------------------|---------------|---------|
| Specimen No. | -- | 1 | -- |
| Dibutyl Phthalate (DBP) | 84-74-2 | ND | 0.003 |
| Benzylbutyl Phthalate (BBP) | 85-68-7 | ND | 0.003 |
| Bis-(2-ethylhexyl) Phthalate (DEHP) | 117-81-7 | ND | 0.003 |
| Diisononyl Phthalate (DINP) | 28553-12-0 68515-48-0 | ND | 0.010 |
| Di-n-octyl Phthalate (DNOP) | 117-84-0 | ND | 0.003 |
| Diisodecyl Phthalate (DIDP) | 26761-40-0 68515-49-1 | ND | 0.010 |
| Di-n-Hexyl phthalate (DHP/DnHP) | 84-75-3 | ND | 0.003 |
| Diisobutyl phthalate (DIBP) | 84-69-5 | ND | 0.003 |
| Di-n-pentyl phthalate (DPP/DPenP) | 131-18-0 | ND | 0.003 |
| Dicyclohexyl phthalate (DCHP) | 84-61-7 | ND | 0.003 |

Specimen Description:

- Black rubber (#1-55658 Black rubber grip)

- Note:
- % = percentage by weight
 - MDL = Method Detection Limit
 - ND = Not Detected (lower than MDL)

This document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx> and, for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com/en/Terms-and-Conditions/Terms-e-Document.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.

The Phthalates Content Requirement(s) is(are) Summarize as below:

| Requirement(s) | Permissible Limit |
|--|---|
| Consumer Product Safety Improvement Act of 2008 | |
| - Toys for children up to 12 or childcare articles for children up to 3 | - DEHP, BBP or DBP ≤ 0.1% |
| - Toys for children up to 12 that can be placed in the mouth or childcare articles for children up to 3 | - DINP, DNOP or DIDP ≤ 0.1% |
| US 16 CFR Part 1307 | |
| - Toys for children up to 12 or childcare articles for children up to 3 | - DEHP, BBP, DBP, DINP, DIBP, DPENP, DHEXP, and DCHP ≤ 0.1% |
| California Proposition 65 (County of Santa Clara Case No. 1-12-CV-230462) | |
| - Automobile accessories including dashboard-related items - Watches, - Clocks - Ear plugs, buds and related accessories - Temporary tattoos - Charms - Plastic figures and small novelties - Stationery- related items/sundries - Bathroom accessories - Kitchen floor and door/welcome mats | ≤ 0.1% DEHP (For Bandage) ≤ 0.1% DEHP, BBP, DBP(For other product) |
| California Proposition 65 (Out-of-court settlement) | |
| - Pens with vinyl/PVC charm toppers - Vinyl/PVC stationery products include but not limited to eraser and sharpener, pen, pencil cases, clipboards calculator and LED booklight | ≤ 0.1% DEHP |

2. CPSC 16 CFR 1303 - Lead in Paint/Similar Surface Coating Materials

Method: With reference to CPSC-CH-E1003-09.1 - Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings

| Test Item(s) | Lead (Pb) |
|---|------------------------|
| Permissible Limit (ppm) | 90 |
| Specimen Description | Result(s) (ppm) |
| 1. Red coating on metal (#4-55658 Red coating on metal) | ND |
| 2. Blue coating on metal (#5-55658 Blue coating on metal) | ND |

This document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx> and, for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com/en/Terms-and-Conditions/Terms-e-Documents.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.



Test Report

No.T32120300299TC

Date: SEP 15, 2021

Page 5 of 8

- Note:
- ppm = parts per million
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit = 10 ppm
 - 1% = 10000 mg/kg = 10000 ppm

3.1 CPSIA - Lead in Paint/Similar Surface Coating Materials

Method: With reference to CPSC-CH-E1003-09.1 - Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings

| Test Item(s) | Lead (Pb) |
|---|--------------------|
| Permissible Limit (ppm) | 90 |
| Specimen Description | Result(s) (ppm) |
| 1. Red coating on metal (#4-55658 Red coating on metal) | ND |
| 2. Blue coating on metal (#5-55658 Blue coating on metal) | ND |

- Note:
- ppm = parts per million
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit = 10 ppm
 - 1% = 10000 mg/kg = 10000 ppm

3.2 CPSIA - Lead in Accessible Substrate Materials

Method (non-metallic materials): With reference to CPSC-CH-E1002-08.3 - Standard Operation Procedure for Determining Total Lead (Pb) in Non-Metal Children Product

Method (metal materials): With reference to CPSC-CH-E1001-08.3 - Standard Operating Procedure for Determining Total Lead (Pb) in Children's Metal Products (Including Children's Metal Jewelry)

| Test Item(s) | Lead (Pb) |
|---|--------------------|
| Permissible Limit ^{**} (ppm) | 100 |
| Specimen Description | Result(s) (ppm) |
| 1. Black rubber (#1-55658 Black rubber grip) | ND |
| 2. Silvery plated white plastic (#2-55658 Silvery plated white plastic) | ND |
| 3. Black metal (#3-55658 Black metal barrel) | ND |
| 4. Silvery metal (#5-55658 Silvery metal) | ND |
| 5. Silvery-grey metal (#6-55658 Gunmetal metal barrel) | ND |

This document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx> and, for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com/en/Terms-and-Conditions/Terms-e-Documents.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.

** Permissible Limit applies to a children's product manufactured after 14 August 2011 (Public Law 110-314 (Consumer Product Safety Improvement Act of 2008) and its Amendments Public Law 112-28)

- Note:
- ppm = parts per million
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit = 10 ppm
 - 1% = 10000 mg/kg = 10000 ppm

4. US California Proposition 65 – Total Lead Content

Method: With reference to CPSC-CH-E1003-09.1 - Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings

Method (non-metallic materials): With reference to CPSC-CH-E1002-08.3 - Standard Operation Procedure for Determining Total Lead (Pb) in Non-Metal Children Product

Method (metal materials): With reference to CPSC-CH-E1001-08.3 - Standard Operating Procedure for Determining Total Lead (Pb) in Children's Metal Products (Including Children's Metal Jewelry)

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES)

| Test Item(s) | Lead (Pb) |
|---|-----------------|
| Specimen Description | Result(s) (ppm) |
| 1. Red coating on metal (#4-55658 Red coating on metal) | ND |
| 2. Blue coating on metal (#5-55658 Blue coating on metal) | ND |
| 3. Black rubber (#1-55658 Black rubber grip) | ND |
| 4. Silvery plated white plastic (#2-55658 Silvery plated white plastic) | ND |
| 5. Black metal (#3-55658 Black metal barrel) | ND |
| 6. Silvery metal (#5-55658 Silvery metal) | ND |
| 7. Silvery-grey metal (#6-55658 Gunmetal metal barrel) | ND |

- Note:
- ppm = parts per million
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit =10 ppm
 - 1% = 10000mg/kg=10000ppm

This document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx> and, for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com/en/Terms-and-Conditions/Terms-e-Documents.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.

Remark: Summary of permissible limit(s) of Lead requirement otherwise warning label required.

| Requirement(s) | Permissible Limit of Lead (ppm) | Effective Date |
|---|---------------------------------|----------------|
| California Proposition 65 (County of Los Angeles Case No. BC479596) | 100 | Current |
| California Proposition 65 (Out-of-court Settlement for Vinyl/PVC stationery products include but not limited to eraser and sharpener, pen, pencil cases, clipboards calculator and LED booklight) | 100 | Current |

5. Canada Consumer Product Safety Act (S.C. 2010, c. 21), Toys Regulations (SOR/2011-17) amended up to January 11, 2019 (Including amendments SOR/2012-71, SOR/2016-195, SOR/2016-302 and SOR/2018-138) - Section 23 (a) and Section 23 (c) - Lead and Mercury in surface coating material

Method: With reference to Canada Health Product Safety Bureau, Reference Manual Book 5 – Laboratory Policies and Procedures, Part B: Test Methods Section, Method C-02.2:2017 and C-07:2019

| Test Item(s) | Pb | Hg |
|---|--------------------------|-----------|
| Permissible Limit (mg/kg) | 90 | ND |
| Specimen Description | Result(s) (mg/kg) | |
| 1. Red coating on metal (#4-55658 Red coating on metal) | ND | ND |
| 2. Blue coating on metal (#5-55658 Blue coating on metal) | ND | ND |

- Note:
- mg/kg = milligram per kilogram
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit
 - MDL for Pb = 10 mg/kg
 - MDL for Hg = 10 mg/kg
 - The action level of Mercury is 10 mg/kg according to the Industry guide to Health Canada’s Safety Requirements for Children’s Toys and Related Products, 2012

This document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx> and, for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com/en/Terms-and-Conditions/Terms-e-Documents.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company’s findings at the time of its intervention only and within the limits of Client’s instructions, if any. The Company’s sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.

Remark:

When statement of conformity is made, unless the decision rule was mentioned in above specified test items, the decision rule would be based on the non-binary statement with guard band (is equal to the expanded measurement uncertainty with a 95% coverage probability, $w = U_{95}$) in ILAC-G8:09/2019 Clause 4.2.3.

“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%.”

“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%.

“Inconclusive – It is not possible to state the conformity. Either one or more measured values were observed in the portion of the expanded measurement uncertainty intervals at the points tested where the specific risk is up to 50%.”

Sample Photo:



SGS authenticate the photo on original report only

*** End of Report ***

This document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx> and, for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com/en/Terms-and-Conditions/Terms-e-Documents.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.