

# Test Report

Report No.:RKEYS251224264

Date:Jan. 28, 2026

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**Applicant:** Mid Ocean Brands B.V.  
**Address:** Unit 711-716, 7/F., Tower A, 83 King Lam Street, Cheung Sha Wan, Kowloon, Hong Kong  
**Manufacturer:** 117486  
**Address:** N/A

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

**Sample Name:** Torch  
**Sample Model:** MO2786  
**Series Model:** MO2991  
**Sample Received Date:** Dec. 24, 2025  
**Testing Period:** Dec.24, 2025 to Jan. 13, 2026

## Test Requested

As requested by the applicant, refer to attached page(s) for details.

\*\*\*\*\*

Approved by:



Johnny Chen/Technical Manager



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## Summary of Test Results:

Test Standard		Conclusion
RoHS Directive 2011/65/EU and its subsequent amendments Directive (EU) 2015/863		
1	To determine Lead (Pb), Cadmium(Cd), Mercury(Hg), Hexavalent Chromium(Cr(VI)), Polybrominated Biphenyls (PBBs) and Polybrominated DiphenylEthers (PBDEs)content by screening test and chemical test.	Pass
2	To determine Phthalates (DBP, BBP, DEHP, DIBP) content by chemical test.	Pass

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## Test Results:

### (1)XRF Test Result:

No.	XRF Result(mg/kg)					Chemical Test (mg/kg)	Conclusion
	Pb	Cd	Hg	Cr	Br		
1	BL	BL	BL	BL	BL	--	Pass
2	BL	BL	BL	BL	BL	--	Pass
3	BL	BL	BL	BL	BL	--	Pass
4	BL	BL	BL	X	--	CrVI: Negative	Pass
5	BL	BL	BL	BL	BL	--	Pass
6	BL	BL	BL	BL	BL	--	Pass
7	BL	BL	BL	BL	BL	--	Pass
8	BL	BL	BL	BL	--	--	Pass
9	BL	BL	BL	BL	BL	--	Pass
10	BL	BL	BL	BL	BL	--	Pass
11	BL	BL	BL	BL	BL	--	Pass
12	BL	BL	BL	X	--	CrVI: Negative	Pass
13	BL	BL	BL	BL	BL	--	Pass
14	BL	BL	BL	BL	X	PBBs/PBDEs:N.D.	Pass
15	BL	BL	BL	BL	BL	--	Pass
16	BL	BL	BL	BL	BL	--	Pass
17	BL	BL	BL	BL	BL	--	Pass
18	BL	BL	BL	BL	BL	--	Pass
19	BL	BL	BL	BL	--	--	Pass
20	BL	BL	BL	BL	--	--	Pass
21	BL	BL	BL	BL	BL	--	Pass
22	BL	BL	BL	BL	BL	--	Pass
23	BL	BL	BL	BL	BL	--	Pass
24	BL	BL	BL	BL	--	--	Pass
25	BL	BL	BL	BL	BL	--	Pass

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No.	XRF Result(mg/kg)					Chemical Test (mg/kg)	Conclusion
	Pb	Cd	Hg	Cr	Br		
26	BL	BL	BL	BL	--	--	Pass
27	BL	BL	BL	BL	BL	--	Pass
28	BL	BL	BL	BL	--	--	Pass
29	BL	BL	BL	BL	X	PBBs/PBDEs:N.D.	Pass
30	BL	BL	BL	X	--	CrVI: Negative	Pass
31	BL	BL	BL	BL	BL	--	Pass
32	BL	BL	BL	BL	BL	--	Pass
33	BL	BL	BL	BL	BL	--	Pass
34	BL	BL	BL	BL	BL	--	Pass
35	BL	BL	BL	X	--	CrVI: Negative	Pass
36	BL	BL	BL	BL	BL	--	Pass
37	BL	BL	BL	BL	--	--	Pass
38	BL	BL	BL	BL	--	--	Pass
39	BL	BL	BL	BL	--	--	Pass
40	BL	BL	BL	BL	BL	--	Pass
41	BL	BL	BL	BL	BL	--	Pass
42	BL	BL	BL	BL	--	--	Pass
43	BL	BL	BL	BL	BL	--	Pass
44	BL	BL	BL	BL	BL	--	Pass
45	BL	BL	BL	BL	--	--	Pass
46	BL	BL	BL	BL	--	--	Pass
47	BL	BL	BL	BL	--	--	Pass

**Remark:** 1.It is the result on total Br while test item on restricted substances in PBBs/PBDEs. It is the result on total Cr while test item on restricted substances is Cr(VI).  
2.Screening test by XRF spectroscopy. XRF screening limits in mg/kg for regulated elements according to IEC 62321-3-1: 2013Annex A.

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Element	Polymer Material	Metallic Material	Composite Material
Pb	$BL \leq 700 - 3\sigma \leq X < 1300 + 3\sigma \leq OL$	$BL \leq 700 - 3\sigma \leq X < 1300 + 3\sigma \leq OL$	$BL \leq 500 - 3\sigma \leq X < 1500 + 3\sigma \leq OL$
Cd	$BL \leq 70 - 3\sigma \leq X < 130 + 3\sigma \leq OL$	$BL \leq 70 - 3\sigma \leq X < 130 + 3\sigma \leq OL$	$LOD < X < 150 + 3\sigma \leq OL$
Hg	$BL \leq 700 - 3\sigma \leq X < 1300 + 3\sigma \leq OL$	$BL \leq 700 - 3\sigma \leq X < 1300 + 3\sigma \leq OL$	$BL \leq 500 - 3\sigma \leq X < 1500 + 3\sigma \leq OL$
Cr	$BL \leq 700 - 3\sigma < X$	$BL \leq 700 - 3\sigma < X$	$BL \leq 500 - 3\sigma < X$
Br	$BL \leq 300 - 3\sigma < X$	--	$BL \leq 250 - 3\sigma < X$

## XRF Detection Limits in mg/kg for Regulated Elements in Various Material

Element	Polymer Material	Metallic Material	Composite Material
Pb	10	50	50
Cd	10	50	50
Hg	10	50	50
Cr	10	50	50
Br	10	50	50

- Note:**
- 1.BL = Under the XRF screening limit
  - 2.OL = Future chemical test will be conducted while result is above the screening limit
  - 3.X =The symbol“X”marks the region where further investigation in necessary
  - 4.3σ=The reproducibility of analytical instruments
  - 5.LOD=Detection limit

## (2)Wet Chemical Test

Test Item(s)	Test Method/ Test Equipment	Unit	Limit	MDL
Cadmium(Cd)	IEC 62321-5:2013, ICP-OES	mg/kg	100	2
Lead(Pb)	IEC 62321-5:2013, ICP-OES	mg/kg	1000	2
Mercury(Hg)	IEC 62321-4:2013+AMD1:2017, ICP-OES	mg/kg	1000	2
Hexavalent Chromium(CrVI) (Metal)	IEC 62321-7-1:2015, UV-Vis	μg/cm <sup>2</sup>	0.13	0.1
Hexavalent Chromium(CrVI) (Nonmetal)	IEC 62321-7-2:2017, UV-Vis	mg/kg	1000	8

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Test Item(s)	Test Method/ Test Equipment	Unit	Limit	MDL
PBBs (Next form)	IEC 62321-6:2015, GC-MS	mg/kg	1000	5
PBDEs (Next form)	IEC 62321-6:2015, GC-MS	mg/kg	1000	5
Dibutyl Phthalate(DBP)	IEC 62321-8:2017, GC-MS	mg/kg	1000	30
Butyl benzyl phthalate (BBP)	IEC 62321-8:2017, GC-MS	mg/kg	1000	30
Di-(2-ethylhexyl) Phthalate(DEHP)	IEC 62321-8:2017, GC-MS	mg/kg	1000	30
Diisobutyl phthalate (DIBP)	IEC 62321-8:2017, GC-MS	mg/kg	1000	30

PBBs		PBDEs	
Monobromobiphenyl	Hexabromobiphenyl	Monobromodiphenyl ether	Hexabromodiphenyl ether
Dibromobiphenyl	Heptabromobiphenyl	Dibromodiphenyl ether	Heptabromodiphenyl ether
Tribromobiphenyl	Octabromobiphenyl	Tribromodiphenyl ether	Octabromodiphenyl ether
Tetrabromobiphenyl	Nonabromobiphenyl	Tetrabromodiphenyl ether	Nonabromodiphenyl ether
Pentabromobiphenyl	Decabromobiphenyl	Pentabromodiphenyl ether	Decabromodiphenyl ether

- Note:**
1. mg/kg= ppm=0.0001%
  2. N.D.= Not Detected(<MDL)
  3. MDL = Method Detection Limit
  4. -- = No Testing
  5. When Cr (VI) in a sample is detected below the 0.10  $\mu\text{g}/\text{cm}^2$  LOQ (limit of quantification), the sample is considered to be negative for Cr (VI). Since Cr (VI) may not be uniformly distributed in the coating even within the same sample batch, a "grey zone" between 0.10  $\mu\text{g}/\text{cm}^2$  and 0.13  $\mu\text{g}/\text{cm}^2$  has been established as "inconclusive" to reduce inconsistent results due to unavoidable coating variations. In this case, additional testing may be necessary to confirm the presence of Cr (VI). When Cr (VI) is detected above 0.13  $\mu\text{g}/\text{cm}^2$ , the sample is considered to be positive for the presence of Cr (VI) in the coating layer. 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.

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## (3)Phthalate Test Result:

Test No.	Test Item(s)				Conclusion
	Dibutyl Phthalate (DBP)	Butyl benzyl phthalate (BBP)	Di-(2-ethylhexyl) Phthalate (DEHP)	Diisobutyl phthalate (DIBP)	
1	N.D.	N.D.	N.D.	N.D.	Pass
2	N.D.	N.D.	N.D.	N.D.	Pass
3	N.D.	N.D.	N.D.	N.D.	Pass
5	N.D.	N.D.	N.D.	N.D.	Pass
6	N.D.	N.D.	N.D.	N.D.	Pass
7	N.D.	N.D.	N.D.	N.D.	Pass
9	N.D.	N.D.	N.D.	N.D.	Pass
10	N.D.	N.D.	N.D.	N.D.	Pass
11	N.D.	N.D.	N.D.	N.D.	Pass
13	N.D.	N.D.	N.D.	N.D.	Pass
14	N.D.	N.D.	N.D.	N.D.	Pass
15	N.D.	N.D.	N.D.	N.D.	Pass
16	N.D.	N.D.	N.D.	N.D.	Pass
17	N.D.	N.D.	N.D.	N.D.	Pass
18	N.D.	N.D.	N.D.	N.D.	Pass
21	N.D.	N.D.	N.D.	N.D.	Pass
22	N.D.	N.D.	N.D.	N.D.	Pass
23	N.D.	N.D.	N.D.	N.D.	Pass
25	N.D.	N.D.	N.D.	N.D.	Pass
27	N.D.	N.D.	N.D.	N.D.	Pass
29	N.D.	N.D.	N.D.	N.D.	Pass
31	N.D.	N.D.	N.D.	N.D.	Pass
32	N.D.	N.D.	N.D.	N.D.	Pass
33	N.D.	N.D.	N.D.	N.D.	Pass
34	N.D.	N.D.	N.D.	N.D.	Pass
36	N.D.	N.D.	N.D.	N.D.	Pass

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Test No.	Test Item(s)				Conclusion
	Dibutyl Phthalate (DBP)	Butyl benzyl phthalate (BBP)	Di-(2-ethylhexyl) Phthalate (DEHP)	Diisobutyl phthalate (DIBP)	
40	N.D.	N.D.	N.D.	N.D.	Pass
41	N.D.	N.D.	N.D.	N.D.	Pass
43	N.D.	N.D.	N.D.	N.D.	Pass
44	N.D.	N.D.	N.D.	N.D.	Pass

**Note:** 1. mg/kg= ppm=0.0001%  
2. N.D.= Not Detected(<MDL)



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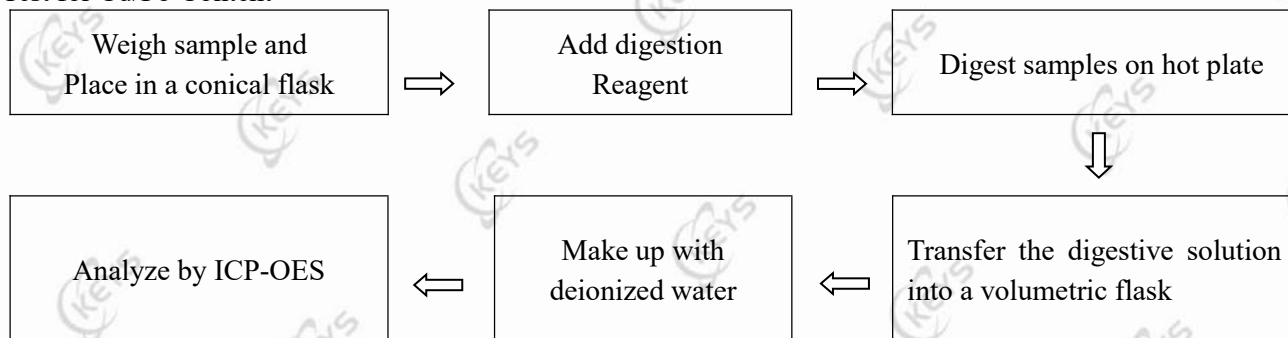
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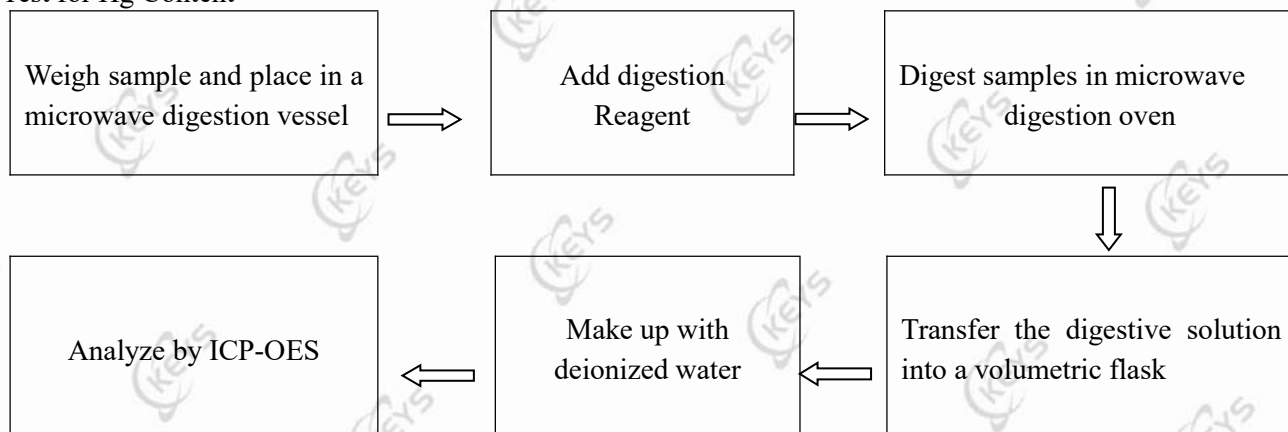
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## Test Process:

### 1. Test for Cd/Pb Content



### 2. Test for Hg Content



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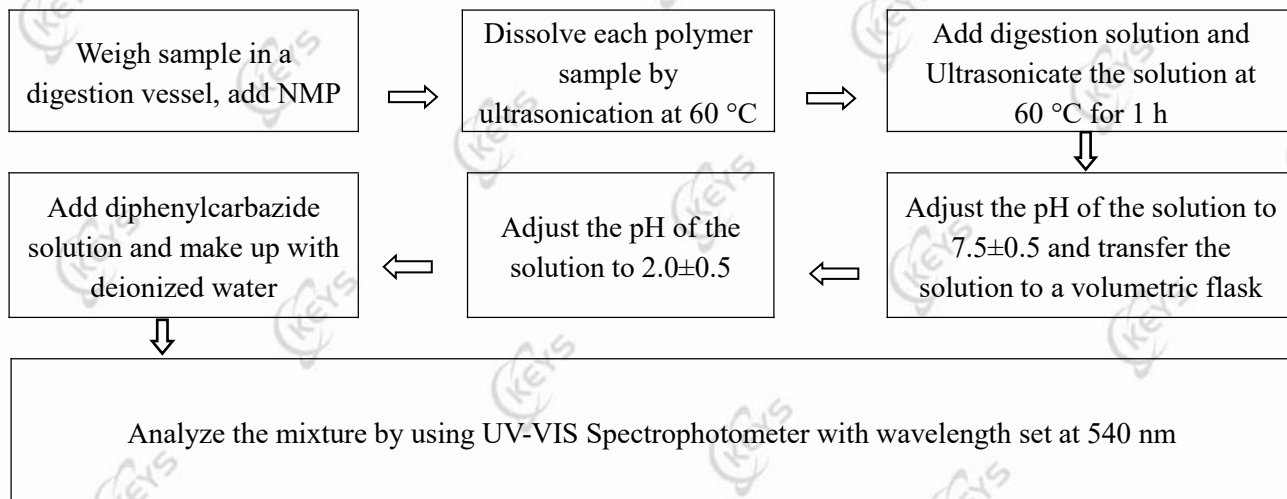
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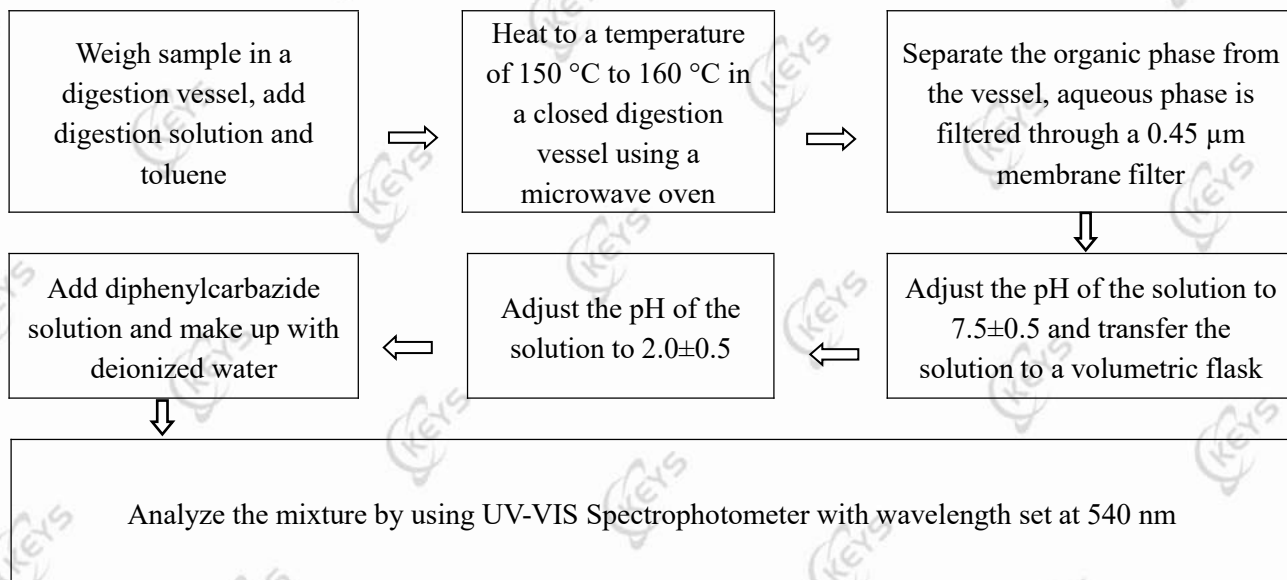
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## 3. Test for Chromium (VI) Content

Soluble polymers:



Insoluble/unknown polymers and electronics without Sb



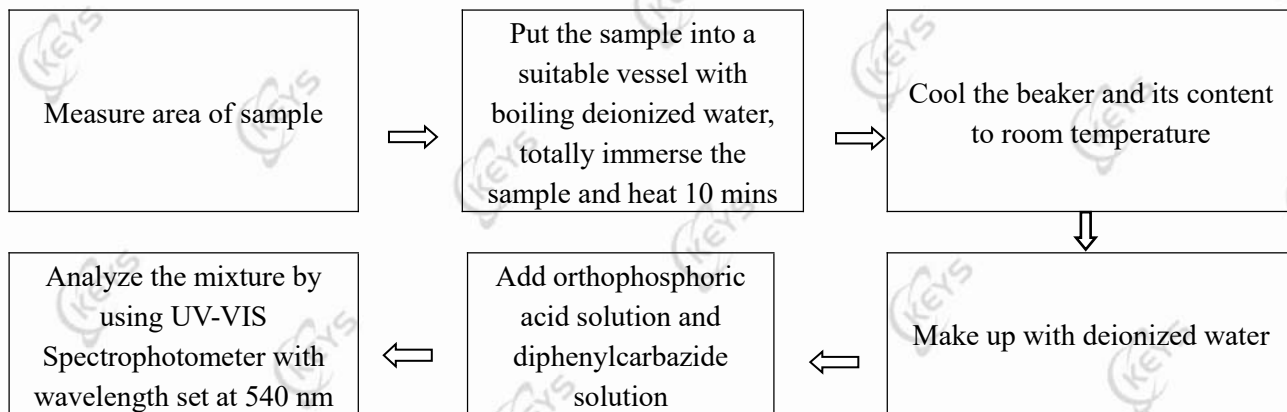
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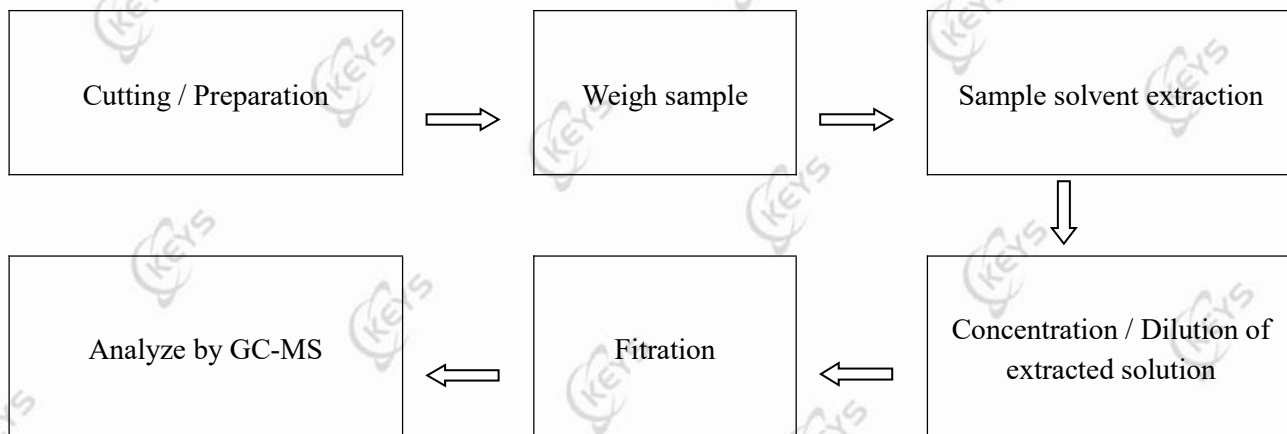
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Metal material



## 4. Test for DBP, BBP, DEHP, DIBP, PBB, PBDE Content



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## Sample Description:

No.	Description
1	Black plastic fixation
2	Sky blue soft plastic button
3	Black woven rope (thin)
4	Black metal screw
5	Black plastic hanging rope fixation
6	Black woven hanging rope
7	Black printed blue plastic battery cover
8	Silvery metal contact
9	White plastic wire skin
10	Red plastic wire skin
11	Black plastic interface fixation
12	Silvery metal interface
13	Black resistor
14	Green PCB
15	Black plastic button
16	White LED light
17	Black IC
18	Brown capacitor
19	Silvery metal solder
20	Silvery metal solder
21	White PCB
22	Yellow LED light
23	White plastic USB interface fixation
24	Silvery metal contact
25	Black plastic USB interface fixation
26	Silvery metal USB interface

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No.	Description
27	Matte black plastic Type-C interface fixation
28	Silvery metal solder
29	Green PCB
30	Silvery metal Type-C interface
31	Black plastic Type-C interface fixation
32	Black plastic outer wire skin
33	Black plastic wire skin
34	Red plastic wire skin
35	Bronze metal wire core
36	Transparent plastic lens
37	Black metal shell
38	Military green metal shell
39	Deep blue metal shell
40	Silvery plastic reflective cup
41	Transparent plastic sheet
42	Silvery metal spring
43	Black plastic ring
44	White plastic
45	Black metal shell
46	Deep blue metal shell
47	Military green metal shell



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## Photograph(s) of Sample:



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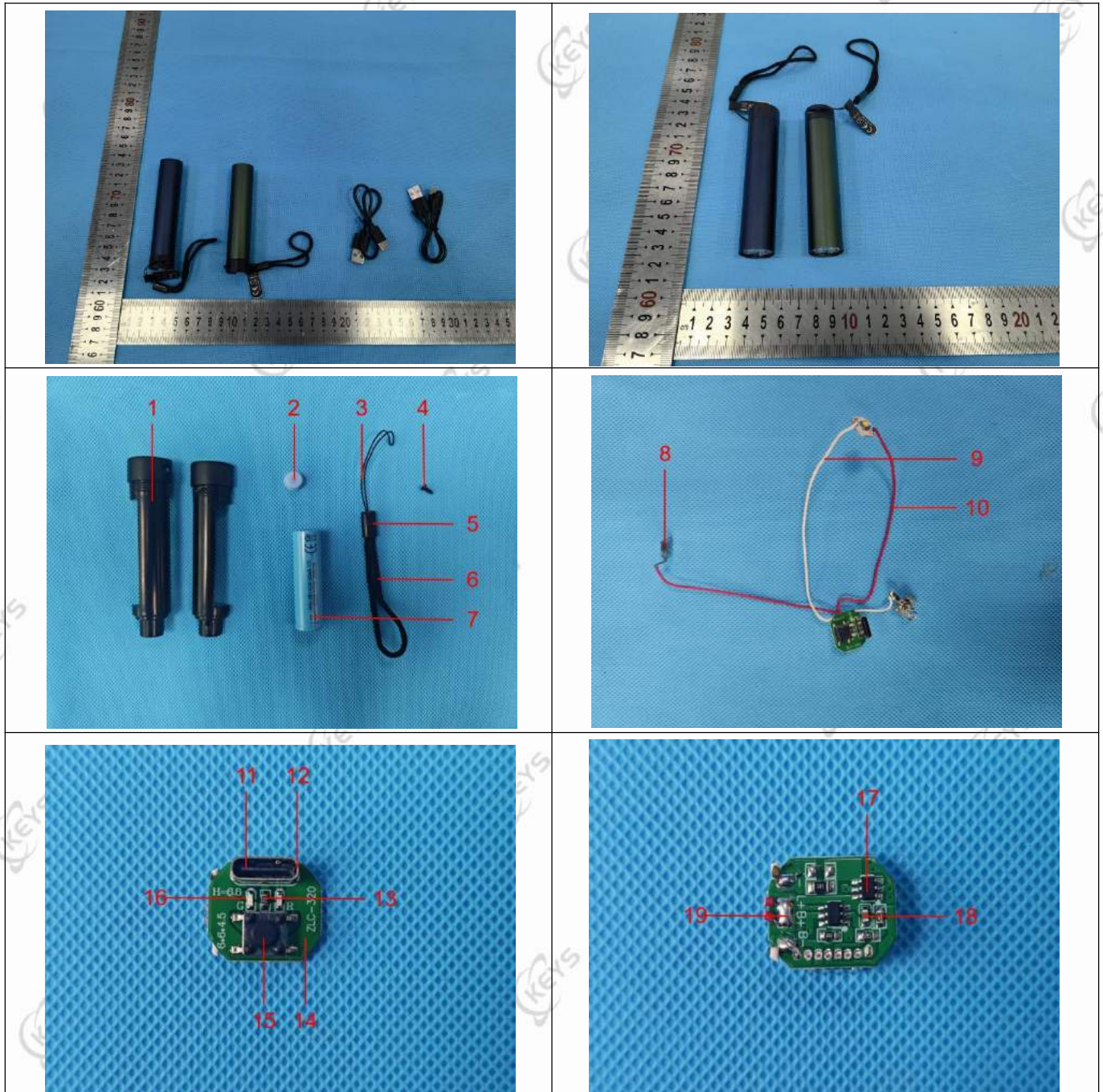


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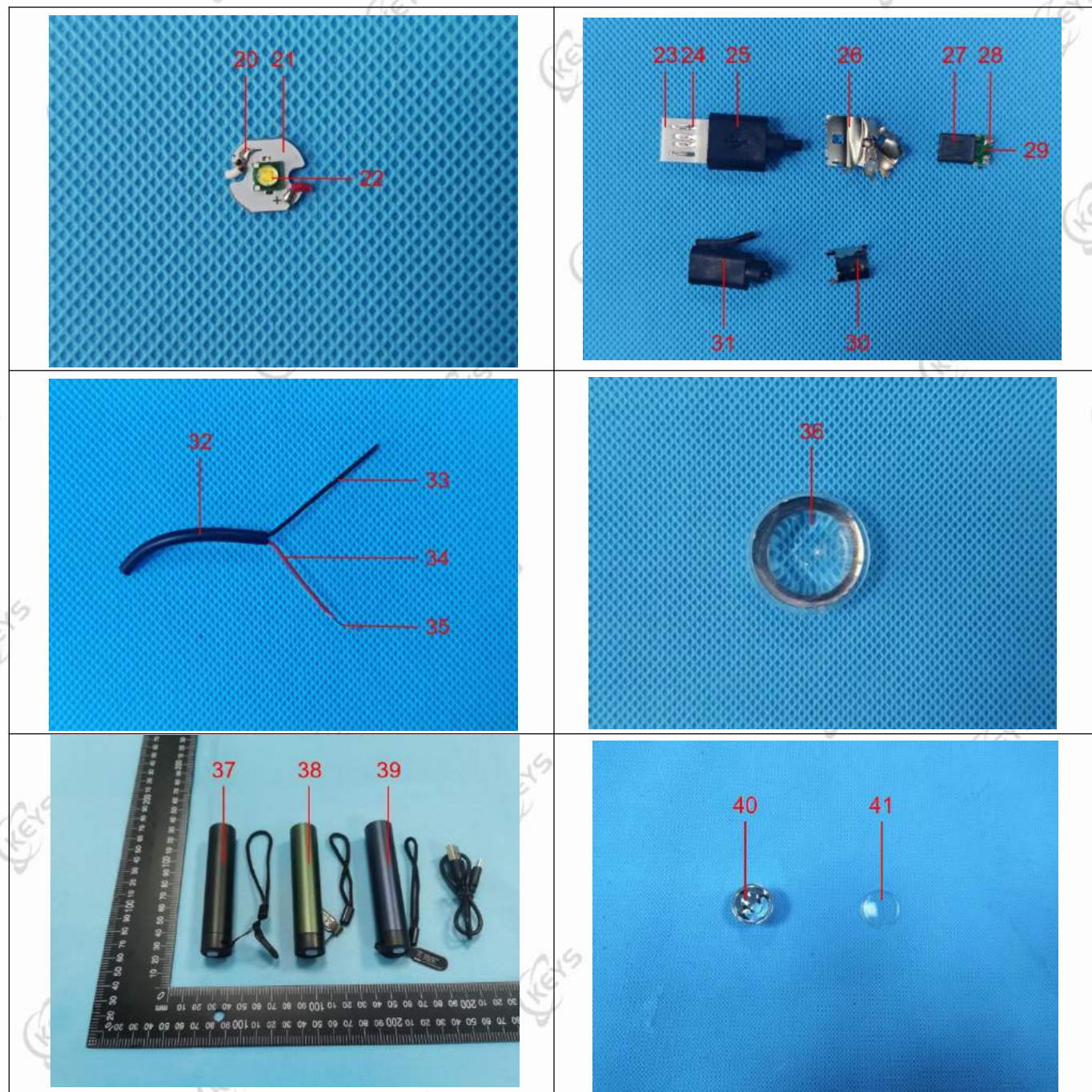


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