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## Test Report

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Report No. : AGC05443250811-001

**SAMPLE NAME** : Notebook with pen  
**MODEL NAME** : IT3775  
**APPLICANT** : MID OCEAN BRANDS B.V.  
**STANDARD(S)** : Please refer to the following page(s).  
**DATE OF ISSUE** : Aug. 13, 2025

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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.  
Test Site : 6/F., Building 2, Sanwei Chaxi Industrial Park, Sanwei Community, Hangcheng Street, Bao'an District, Shenzhen, Guangdong, China

**Report on the submitted sample(s) said to be:**

Sample Name : Notebook with pen  
Model : IT3775  
Vendor code : 114628  
Country of Origin : CHINA  
Country of Destination : EUROPE  
Sample Received Date : Aug. 08, 2025  
Testing Period : Aug. 08, 2025 to Aug. 13, 2025  
Test Requested : Selected test(s) as requested by client.

**Test Requested:****Conclusion**

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 63

- Lead(Pb) Content

Pass

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 23

-Cadmium(Cd) Content

Pass

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 51&amp;52

- Phthalates Content

Pass

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 50

- Polycyclic-aromatic Hydrocarbons (PAHs) Content

Pass

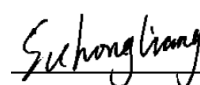
Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 43

- Aromatic Amines Azodyes (AZO) Content

Pass

- Colour fastness to rubbing

Pass

Approved by: 

Suhongliang

Technical Director

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## Report Revise Record

Report Version	Issued Date	Valid Version	Notes
/	Aug. 13, 2025	Valid	Initial release

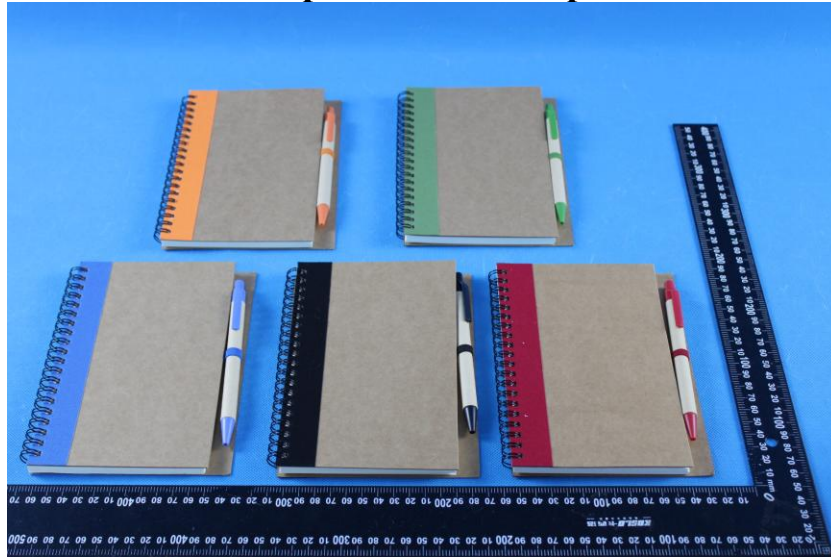
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### The photo of the sample



The photo of AGC05443250811-001 is for use only with the original report.

### Test Point Description

Test point	Test point description
1-1	Brown carton cover
1-2	White paper
1-3	Metal ring
1-4	Black coating
1-5	Red cloth
1-6	Black cloth
1-7	Blue cloth
1-8	Orange cloth
1-9	Green cloth
1-10	Red elastic band
1-11	Black elastic band
1-12	Blue elastic band
1-13	Orange elastic band
1-14	Green elastic band
1-15	Black plastic pen head
1-16	Black plastic pen button

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Test point	Test point description
1-17	Black plastic pen clip
1-18	Brown carton pen barrel
1-19	White plastic thrust device(long)
1-20	White plastic thrust device(short)
1-21	White plastic pen core pipe
1-22	Metal spring
1-23	Blue ink
1-24	Red plastic pen head
1-25	Red plastic pen button
1-26	Red plastic pen clip
1-27	Blue plastic pen head
1-28	Blue plastic pen button
1-29	Blue plastic pen clip
1-30	Orange plastic pen head
1-31	Orange plastic pen button
1-32	Orange plastic pen clip
1-33	Green plastic pen head
1-34	Green plastic pen button
1-35	Green plastic pen clip

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### Test Results:

Note: N.D.=Not Detected (less than method detection limit), MDL = Method Detection Limit, 1mg/kg=0.0001%

Unless otherwise stated, the decision rule for conformity reporting is based on Binary Statement for Simple Acceptance Rule (w=0) stated in ILAC-G8:09/2019/CNAS-GL015:2022.

### Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 63

#### - Lead(Pb) Content

Test Methods and Equipment: IEC 62321-5:2013; ICP-OES

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-1+1-2	1-3	1-4
Lead(Pb)	mg/kg	500	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-5+1-6+1-7	1-8+1-9	1-10+1-11+1-12
Lead(Pb)	mg/kg	500	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-13+1-14	1-15+1-16+1-17	1-18
Lead(Pb)	mg/kg	500	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-19+1-20+1-21	1-22	1-23
Lead(Pb)	mg/kg	500	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-24+1-25+1-26	1-27+1-28+1-29	1-30+1-31+1-32
Lead(Pb)	mg/kg	500	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-33+1-34+1-35	
Lead(Pb)	mg/kg	500	10	N.D.	
Conclusion				Conformity	

#### Remark:

1. As specified by client, the submitted samples were mixed to test, the test points:

1-1+1-2,1-5+1-6+1-7,1-8+1-9,1-10+1-11+1-12,1-13+1-14,1-15+1-16+1-17,1-19+1-20+1-21,1-24+1-25+1-26,1-27+1-28+1-29,1-30+1-31+1-32,1-33+1-34+1-35

2. As specified by client, the submitted samples were directly tested without drying, the test points: 1-23

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# Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 23

## -Cadmium(Cd) Content

Test Methods and Equipment: IEC 62321-5:2013; ICP-OES

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-4	1-15+1-16 +1-17	1-19+1-20 +1-21
Cadmium(Cd)	mg/kg	100	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-24+1-25 +1-26	1-27+1-28 +1-29	1-30+1-31 +1-32
Cadmium(Cd)	mg/kg	100	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-33+1-34+1-35	
Cadmium(Cd)	mg/kg	100	10	N.D.	
Conclusion				Conformity	

Remark:

1. As specified by client, the submitted samples were mixed to test, the test points:

1-15+1-16+1-17,1-19+1-20+1-21,1-24+1-25+1-26,1-27+1-28+1-29,1-30+1-31+1-32,1-33+1-34+1-35

# Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 51&52

## - Phthalates Content

Test Methods and Equipment: IEC 62321-8:2017; GC-MS

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-4	1-15+1-16 +1-17	1-19+1-20 +1-21
Diisobutyl phthalate (DIBP) CAS:84-69-5	%	0.1	0.005	N.D.	N.D.	N.D.
Dibutyl phthalate (DBP) CAS:84-74-2	%	0.1	0.005	N.D.	N.D.	N.D.
Butylbenzyl phthalate (BBP) CAS:85-68-7	%	0.1	0.005	N.D.	N.D.	N.D.
Di-(2-ethylhexyl) Phthalate (DEHP) CAS:117-81-7	%	0.1	0.005	N.D.	N.D.	N.D.
Di-n-octyl phthalate (DNOP) CAS:117-84-0	%	/	0.005	N.D.	N.D.	N.D.
Di-isononyl phthalate (DINP) CAS:28553-12-0, 68515-48-0	%	/	0.005	N.D.	N.D.	N.D.
Di-isodecyl phthalate(DIDP) CAS:26761-40-0, 68515-49-1	%	/	0.005	N.D.	N.D.	N.D.

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Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-4	1-15+1-16 +1-17	1-19+1-20 +1-21
Sum of DIBP +DBP+BBP+DEHP	%	0.1	/	N.D.	N.D.	N.D.
Sum of DNOP+DINP+DIDP	%	0.1	/	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-24+1-25+1-26	1-27+1-28+1-29	1-30+1-31+1-32
Diisobutyl phthalate (DIBP) CAS:84-69-5	%	0.1	0.005	N.D.	N.D.	N.D.
Dibutyl phthalate (DBP) CAS:84-74-2	%	0.1	0.005	N.D.	N.D.	N.D.
Butylbenzyl phthalate (BBP) CAS:85-68-7	%	0.1	0.005	N.D.	N.D.	N.D.
Di-(2-ethylhexyl) Phthalate (DEHP) CAS:117-81-7	%	0.1	0.005	N.D.	N.D.	N.D.
Di-n-octyl phthalate (DNOP) CAS:117-84-0	%	/	0.005	N.D.	N.D.	N.D.
Di-isononyl phthalate (DINP) CAS:28553-12-0, 68515-48-0	%	/	0.005	N.D.	N.D.	N.D.
Di-isodecyl phthalate(DIDP) CAS:26761-40-0, 68515-49-1	%	/	0.005	N.D.	N.D.	N.D.
Sum of DIBP +DBP+BBP+DEHP	%	0.1	/	N.D.	N.D.	N.D.
Sum of DNOP+DINP+DIDP	%	0.1	/	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)
				1-33+1-34+1-35
Diisobutyl phthalate (DIBP) CAS:84-69-5	%	0.1	0.005	N.D.
Dibutyl phthalate (DBP) CAS:84-74-2	%	0.1	0.005	N.D.
Butylbenzyl phthalate (BBP) CAS:85-68-7	%	0.1	0.005	N.D.
Di-(2-ethylhexyl) Phthalate (DEHP) CAS:117-81-7	%	0.1	0.005	N.D.
Di-n-octyl phthalate (DNOP) CAS:117-84-0	%	/	0.005	N.D.
Di-isononyl phthalate (DINP) CAS:28553-12-0, 68515-48-0	%	/	0.005	N.D.
Di-isodecyl phthalate(DIDP) CAS:26761-40-0, 68515-49-1	%	/	0.005	N.D.
Sum of DIBP +DBP+BBP+DEHP	%	0.1	/	N.D.
Sum of DNOP+DINP+DIDP	%	0.1	/	N.D.
Conclusion				Conformity

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1. As specified by client, the submitted samples were mixed to test, the test points:

1-15+1-16+1-17,1-19+1-20+1-21,1-24+1-25+1-26,1-27+1-28+1-29,1-30+1-31+1-32,1-33+1-34+1-35

#### Limit requirements of Phthalates

Toys and childcare articles	Each of DEHP, DBP, BBP, DIBP is less than 0.1% or the sum of DEHP+DBP+BBP+DIBP is less than 0.1%
Toys and childcare articles which can be placed in the mouth by children	The sum of DINP+DIDP+DNOP is less than 0.1%

#### Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 50

##### - Polycyclic-aromatic Hydrocarbons (PAHs) Content

Test Methods and Equipment: Afps GS 2019:01 PAK; GC-MS

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-4	1-15+1-16 +1-17	1-24+1-25 +1-26
Benzo[a]pyrene(BaP)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[e]pyrene(BeP)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[a]anthracene(BaA)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[b]fluoranthene(BbF)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[j]fluoranthene(BjFA)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[k]fluoranthene(BkF)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Chrysene(CHR)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Dibenzo[a,h]anthracene(DBA)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-27+1-28 +1-29	1-30+1-31 +1-32	1-33+1-34 +1-35
Benzo[a]pyrene(BaP)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[e]pyrene(BeP)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[a]anthracene(BaA)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[b]fluoranthene(BbF)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[j]fluoranthene(BjFA)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Benzo[k]fluoranthene(BkF)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Chrysene(CHR)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Dibenzo[a,h]anthracene(DBA)	mg/kg	1	0.1	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Remark:

1. As specified by client, the submitted samples were mixed to test, the test points:

1-15+1-16+1-17,1-24+1-25+1-26,1-27+1-28+1-29,1-30+1-31+1-32,1-33+1-34+1-35

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## Limit requirements of Polycyclic-aromatic Hydrocarbons (PAHs) (Unit: mg/kg)

Items	CAS No.	Extender oils or used for the production of tyres or parts of tyres	Any of their rubber or plastic components that come into direct as well as prolonged or short-term repetitive contact with the human skin or the oral cavity	Toys, including activity toys, and childcare articles, any of their rubber or plastic components that come into direct as well as prolonged or short-term repetitive contact with the human skin or the oral cavity
Benzo[a]pyrene(BaP)	50-32-8	≤ 1	≤ 1	≤ 0.5
Benzo[e]pyrene(BeP)	192-97-2	/	≤ 1	≤ 0.5
Benzo[a]anthracene(BaA)	56-55-3	/	≤ 1	≤ 0.5
Benzo[b]fluoranthene(BbF)	205-99-2	/	≤ 1	≤ 0.5
Benzo[j]fluoranthene(BjFA)	205-82-3	/	≤ 1	≤ 0.5
Benzo[k]fluoranthene(BkF)	207-08-9	/	≤ 1	≤ 0.5
Chrysene(CHR)	218-01-9	/	≤ 1	≤ 0.5
Dibenzo[a,h]anthracene(DBA)	53-70-3	/	≤ 1	≤ 0.5
Sum of BaP+ BeP+ BaA+ BbF+ BjFA+ BkF+ CHR+ DBA	/	≤ 10	/	/

**Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 43**
**- Aromatic Amines Azodyes (AZO) Content**

Test Methods and Equipment: EN ISO 14362-1:2017; GC-MS

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-5+1-6+1-7	1-8+1-9
4-Aminobiphenyl CAS:92-67-1	mg/kg	30	5	N.D.	N.D.
Benzidine CAS:92-87-5	mg/kg	30	5	N.D.	N.D.
4-Chloro-o-toluidine CAS:95-69-2	mg/kg	30	5	N.D.	N.D.
2-Naphthylamine CAS:91-59-8	mg/kg	30	5	N.D.	N.D.
o-Aminoazotoluene CAS:97-56-3	mg/kg	30	5	N.D.	N.D.
5-Nitro-o-toluidine CAS:99-55-8	mg/kg	30	5	N.D.	N.D.
p-Chloroaniline CAS:106-47-8	mg/kg	30	5	N.D.	N.D.
4-Methoxy-m-phenylenediamine CAS:615-05-4	mg/kg	30	5	N.D.	N.D.

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Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-5+1-6+1-7	1-8+1-9
4,4'-Diaminodiphenylmethane CAS:101-77-9	mg/kg	30	5	N.D.	N.D.
3,3'-Dichlorobenzidine CAS:91-94-1	mg/kg	30	5	N.D.	N.D.
3,3'-Dimethoxybenzidine CAS:119-90-4	mg/kg	30	5	N.D.	N.D.
3,3'-Dimethylbenzidine CAS:119-93-7	mg/kg	30	5	N.D.	N.D.
4,4'-Methylenedi-o-toluidine CAS:838-88-0	mg/kg	30	5	N.D.	N.D.
p-Cresidine CAS:120-71-8	mg/kg	30	5	N.D.	N.D.
4,4'-Methylenebis[2-chloroaniline] CAS:101-14-4	mg/kg	30	5	N.D.	N.D.
4,4'-Oxydianiline CAS:101-80-4	mg/kg	30	5	N.D.	N.D.
4,4'-Thiodianiline CAS:139-65-1	mg/kg	30	5	N.D.	N.D.
2-Aminotoluene CAS:95-53-4	mg/kg	30	5	N.D.	N.D.
2,4-Toluyldiamine CAS:95-80-7	mg/kg	30	5	N.D.	N.D.
2,4,5-Trimethylaniline CAS:137-17-7	mg/kg	30	5	N.D.	N.D.
o-Anisidine CAS:90-04-0	mg/kg	30	5	N.D.	N.D.
4-Aminoazobenzene CAS:60-09-3	mg/kg	30	5	N.D.	N.D.
Conclusion				Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-10+1-11+1-12	1-13+1-14
4-Aminobiphenyl CAS:92-67-1	mg/kg	30	5	N.D.	N.D.
Benzidine CAS:92-87-5	mg/kg	30	5	N.D.	N.D.
4-Chloro-o-toluidine CAS:95-69-2	mg/kg	30	5	N.D.	N.D.
2-Naphthylamine CAS:91-59-8	mg/kg	30	5	N.D.	N.D.
o-Aminoazotoluene CAS:97-56-3	mg/kg	30	5	N.D.	N.D.
5-Nitro-o-toluidine CAS:99-55-8	mg/kg	30	5	N.D.	N.D.
p-Chloroaniline CAS:106-47-8	mg/kg	30	5	N.D.	N.D.
4-Methoxy-m-phenylenediamine CAS:615-05-4	mg/kg	30	5	N.D.	N.D.
4,4'-Diaminodiphenylmethane CAS:101-77-9	mg/kg	30	5	N.D.	N.D.

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Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-10+1-11+1-12	1-13+1-14
3,3'-Dichlorobenzidine CAS:91-94-1	mg/kg	30	5	N.D.	N.D.
3,3'-Dimethoxybenzidine CAS:119-90-4	mg/kg	30	5	N.D.	N.D.
3,3'-Dimethybenzidine CAS:119-93-7	mg/kg	30	5	N.D.	N.D.
4,4'-Methylenedi-o-toluidine CAS:838-88-0	mg/kg	30	5	N.D.	N.D.
p-Cresidine CAS:120-71-8	mg/kg	30	5	N.D.	N.D.
4,4'-Methylenebis[2-chloroaniline] CAS:101-14-4	mg/kg	30	5	N.D.	N.D.
4,4'-Oxydianiline CAS:101-80-4	mg/kg	30	5	N.D.	N.D.
4,4'-Thiodianiline CAS:139-65-1	mg/kg	30	5	N.D.	N.D.
2-Aminotoluene CAS:95-53-4	mg/kg	30	5	N.D.	N.D.
2,4-Toluyldiamine CAS:95-80-7	mg/kg	30	5	N.D.	N.D.
2,4,5-Trimethylaniline CAS:137-17-7	mg/kg	30	5	N.D.	N.D.
o-Anisidine CAS:90-04-0	mg/kg	30	5	N.D.	N.D.
4-Aminoazobenzene CAS:60-09-3	mg/kg	30	5	N.D.	N.D.
Conclusion				Conformity	Conformity

Remark:

1. As specified by client, the submitted samples were mixed to test, the test points:

1-5+1-6+1-7,1-8+1-9,1-10+1-11+1-12,1-13+1-14

Note: 4-aminoazobenzene: The EN ISO 14362-1:2017 or ISO 17234-1:2020 methods will enable further cleavage of 4-aminoazobenzene to aniline and / or 1,4-phenylenediamine. If aniline and / or 1,4-phenylenediamine are detected, 4-aminoazobenzene shall be further determined by EN ISO 14362-3:2017 or ISO 17234-2:2011.

# **- Colour fastness to rubbing**

**Test Method:** ISO 105-X12:2016

**Rubbing finger:** Cylinder

**The time of conditioning as well as the atmospheric conditions during testing:** 20.2 °C, 64 %R.H., 4 hrs

**The percentage of soak of wet rubbing cloth:** 95%~100%

**The long direction of the specimen:** Endwise/ Crossrange

Test point	Test Result		Conclusion
	Colour fastness to rubbing / (Grade)		
	Dry rubbing	Wet rubbing	
1-5	4-5	3-4	Conformity
1-6	4-5	3	Conformity
1-7	4-5	4	Conformity
1-8	4-5	4-5	Conformity
1-9	4-5	4	Conformity
1-10	4-5	4	Conformity
1-11	4-5	4-5	Conformity
1-12	4-5	4-5	Conformity
1-13	4-5	4-5	Conformity
1-14	4-5	4-5	Conformity
Limit (Client's Requirement)	≥2-3	≥2-3	/

## **Note:**

Colour Fastness Grade:

Grade 5 = No Colour Change (Best Grade)

Grade 1 = Colour Change Seriously (Bad Grade)

9 grades in gray sample card: 5, 4-5, 4, 3-4, 3, 2-3, 2, 1-2, 1.

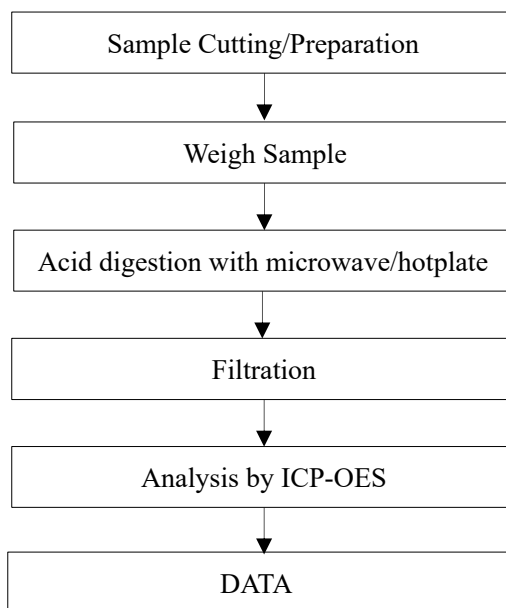
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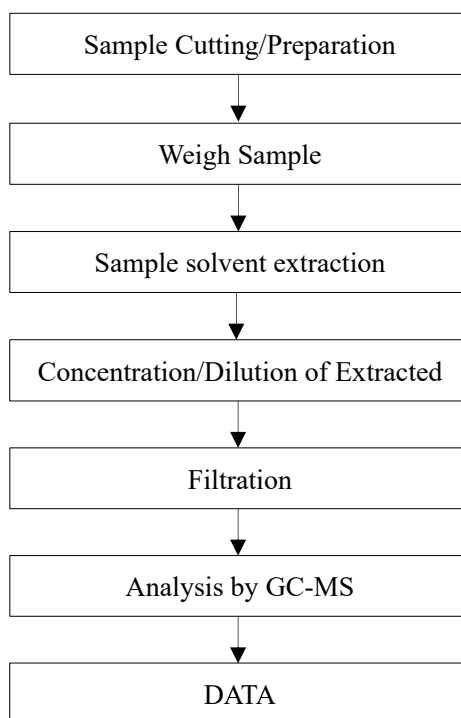
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### Test Flow Chart of Heavy Metal Content



### Test Flow Chart of Phthalates



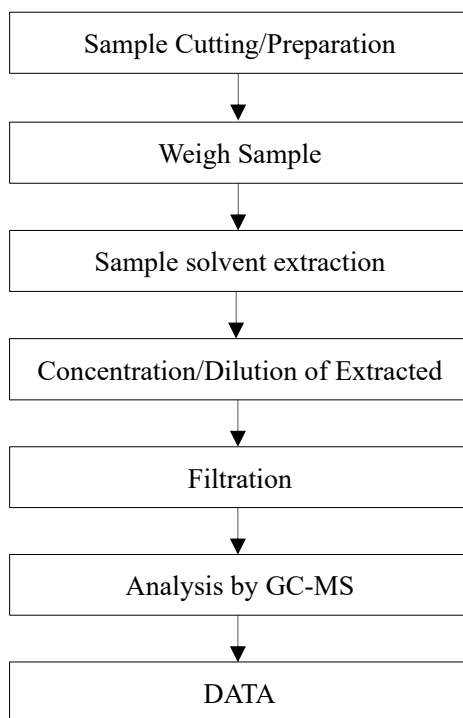
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### Test Flow Chart of Polycyclic-aromatic Hydrocarbons (PAHs)



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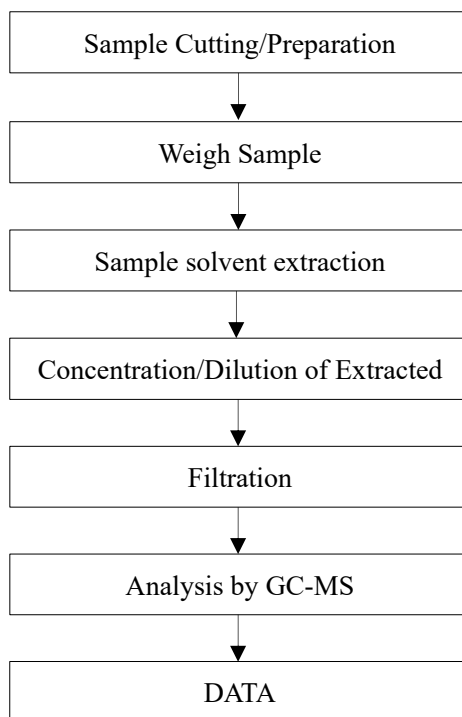
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### Test Flow Chart of AZO



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3. The Company shall not be called or be liable to be called to give evidence or testimony on the Report in a court of law without its prior written consent, unless required by the relevant governmental authorities, laws or court orders.
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7. Clients wishing to use the Report in court proceedings or arbitration shall inform the Company to that effect prior to submitting the sample for testing.
8. The Company is not responsible for recalling the electronic version of the original report when any revision is made to them. The Client assumes the responsibility to providing the revised version to any interested party who uses them.
9. Subject to the variable length of retention time for test data and report stored hereinto as otherwise specifically required by individual accreditation authorities, the Company will only keep the supporting test data and information of the test report for a period of six years. The data and information will be disposed of after the aforementioned retention period has elapsed. Under no circumstances shall we provide any data and information which has been disposed of after retention period. Under no circumstances shall we be liable for damage of any kind, including (but not limited to) compensatory damages, lost profits, lost data, or any form of special, incidental, indirect, consequential or punitive damages of any kind, whether based on breach of contract of warranty, tort (including negligence), product liability or otherwise, even if we are informed in advance of the possibility of such damages.

\*\*\* End of Report \*\*\*

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