



CONSUMER PRODUCTS SERVICES DIVISION

LIFETIME PRODUCTS INC

Technical Report: (8524)320-0174(Revision)

Report Date: November 26, 2024

Revision Date: December 04, 2024

Date Received: November 15, 2024

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MELINDA COLE
LIFETIME PRODUCTS INC
FREEPORT CENTER BLDG, D12
CLEARFIELD, UT 84016-0010
UNITED STATES

| | | | |
|-----------------------------|---|--------------------|-------|
| Sample Description: | PLAYSET SWATCH&SMALL COMPONENTS | | |
| Vendor: | N/A | Sample Size: | 1 |
| Manufacturer: | DONGGUAN L'S GIANT METAL PRODUCTS CO.,LTD | Style No(s): | N/A |
| Buyer: | LIFETIME PRODUCTS INC. | SKN/SKU No.: | N/A |
| Labeled Age Grade: | NOT PRESENT | PO No.: | N/A |
| Appropriate Age Grade: | NOT REQUESTED | Ref #: | N/A |
| Client Specified Age Grade: | 3 - 10 YEARS | Country of Origin: | CHINA |
| Tested Age Grade: | FROM 3 TO 10 YEARS OF AGE | Assortment No.: | N/A |
| UPC Code: | N/A | | |

EXECUTIVE SUMMARY:

The sample(s) MEETS the following requirement(s):

- The total lead content of 90ppm requirements by composite testing of 16 CFR 1303, "Ban of lead-containing paint and certain consumer products bearing lead-containing paint" as mandated by Congress in section 101(f) of the Consumer Products Safety Improvement Act (CPSIA) of 2008, Public Law 110-314.
- The total lead content of 100ppm requirements by composite testing in substrate materials (Consumer Products Safety Improvement Act (CPSIA) of 2008).
- The soluble heavy metals content in surface coating requirements of ASTM F963-23, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.1(2).
- The soluble heavy metals content in substrate requirements of ASTM F963-23, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.2(2)(b).
- The phthalates (BBP, DBP, DEHP, DINP, DIBP, DPENP, DHEXP & DCHP) content requirements of the Consumer Product Safety Improvement Act (CPSIA) of 2008 Sec. 108(a) and 108(c), 16 CFR 1307).
- The phthalates (BBP, DBP, DEHP, DINP, DIBP, DPENP, DHEXP & DCHP) content requirements of ASTM F963-23, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.8.

(*)Note: This report is amendment of and supersedes the previous (8524)320-0174 dated November 26, 2024.



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NOTE: If there are questions or concerns regarding above report, please contact the appropriate lab persons.

Technical questions & concerns:

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Frankie Zhang

Zhang Xin Wei, Frankie
Manager
Analytical Department

FZ / kg



RESULTS:

TOTAL LEAD CONTENT IN SURFACE COATING BY COMPOSITE TESTING ("Ban of Lead-containing paint and certain consumer products bearing Lead-containing paint", Consumer Product Safety Improvement Act (CPSIA) of 2008)

Test Method : U.S. CPSC-CH-E1003.09.1:2011

| Sample Identity | Color / Component | Location | Style |
|-----------------|----------------------|-------------|-------|
| 1 | Deep grey coating | Metal sheet | A |
| 2 | Dull grey coating | Metal sheet | A |
| 3 | Black coating | Metal sheet | A |
| 4 | Bright black coating | Metal sheet | A |
| 5 | Grey coating | Metal sheet | A |
| 6 | Brown coating | Metal sheet | A |
| 7 | Orange red coating | Metal sheet | A |
| 8 | Red coating | Metal sheet | A |
| 9 | Deep red coating | Metal sheet | A |
| 10 | Deep blue coating | Metal sheet | A |
| 11 | Blue coating | Metal sheet | A |
| 12 | Dull blue coating | Metal sheet | A |
| 13 | Deep green coating | Metal sheet | A |
| 14 | Green coating | Metal sheet | A |
| 15 | Light green coating | Metal sheet | A |
| 16 | Soft black coating | Logo | A |

| Parameter | Unit | Result | | | | | Limit |
|-------------------|-------|-----------|-----------|-----------|--------------|---------|-------|
| | | 1 + 2 + 3 | 4 + 5 + 6 | 7 + 8 + 9 | 10 + 11 + 12 | 13 + 14 | |
| Lead (Pb) | mg/kg | LT 10 | LT 10 | LT 10 | LT 10 | LT 10 | 90 |
| Conclusion | - | PASS | PASS | PASS | PASS | PASS | - |

| Parameter | Unit | Result | Limit |
|------------|-------|---------|-------|
| | | 15 + 16 | |
| Lead (Pb) | mg/kg | LT 10 | 90 |
| Conclusion | - | PASS | - |

LT = Less Than

mg/kg = milligrams per kilogram (ppm = parts per million)

* = Average of duplicate analyses

Remark:

In some cases, the tested component cannot be tested individually due to overlapped coatings.



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RESULTS:

TOTAL LEAD CONTENT IN SUBSTRATE BY COMPOSITE TESTING (100PPM) (Consumer Product Safety Improvement Act (CPSIA) of 2008)

Test Method : U.S. CPSC-CH-E1001-08.3:2012 or U.S. CPSC-CH-E1002-08.3:2012

| Sample Identity | Color / Component | Location | Style |
|-----------------|----------------------|--------------------------|-------|
| 17 | Black plastic | Accessory | A |
| 18 | Yellow plastic | Accessory | A |
| 19 | White foam sticker | Back of logo | A |
| 20 | Grey plastic | Inner nut | A |
| 21 | Bright black plastic | Cap nut | A |
| 22 | Silvery metal | Logo | A |
| 23 | Silvery metal | Thin allen screw | A |
| 24 | Silvery metal | Thick allen screw | A |
| 25 | Silvery metal | Full thread allen screw | A |
| 26 | Silvery metal | Philip's head screw | A |
| 27 | Silvery metal | Flat philip's head screw | A |
| 28 | Silvery metal | Small allen screw | A |
| 29 | Silvery metal | Flat allen screw | A |
| 30 | Silvery metal | Big washer | A |
| 31 | Silvery metal | Medium washer | A |
| 32 | Silvery metal | Washer | A |
| 33 | Silvery metal | Small washer | A |
| 34 | Silvery metal | Cap nut | A |
| 35 | Silvery metal | Nut | A |
| 36 | Silvery metal | Allen nut | A |
| 37 | Silvery metal | Stick | A |
| 38 | Silvery metal | Small nut | A |
| 39 | Silvery metal | String | A |
| 40 | Silvery metal | End of string | A |
| 41 | Silvery metal | U screw | A |
| 42 | Silvery metal | Lock | A |
| 43 | Silvery metal | Connector of string | A |
| 44 | Silvery metal | Triangle piece of string | A |

| Parameter | Unit | Result | | | | | Limit |
|-------------------|-------|--------------|---------|-------|-------|-------|-------|
| | | 17 + 18 + 19 | 20 + 21 | 22 | 23 | 24 | |
| Lead (Pb) | mg/kg | LT 10 | LT 10 | LT 10 | LT 10 | LT 10 | 100 |
| Conclusion | - | PASS | PASS | PASS | PASS | PASS | - |



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| Parameter | Unit | Result | | | | | Limit |
|------------|-------|--------|-------|-------|-------|-------|-------|
| | | 25 | 26 | 27 | 28 | 29 | |
| Lead (Pb) | mg/kg | LT 10 | LT 10 | LT 10 | LT 10 | LT 10 | 100 |
| Conclusion | - | PASS | PASS | PASS | PASS | PASS | - |

| Parameter | Unit | Result | | | | | Limit |
|------------|-------|--------|-------|-------|-------|-------|-------|
| | | 30 | 31 | 32 | 33 | 34 | |
| Lead (Pb) | mg/kg | LT 10 | LT 10 | LT 10 | LT 10 | LT 10 | 100 |
| Conclusion | - | PASS | PASS | PASS | PASS | PASS | - |

| Parameter | Unit | Result | | | | | Limit |
|------------|-------|--------|-------|-------|-------|-------|-------|
| | | 35 | 36 | 37 | 38 | 39 | |
| Lead (Pb) | mg/kg | LT 10 | LT 10 | LT 10 | LT 10 | LT 10 | 100 |
| Conclusion | - | PASS | PASS | PASS | PASS | PASS | - |

| Parameter | Unit | Result | | | | | Limit |
|------------|-------|--------|-------|-------|------|-------|-------|
| | | 40 | 41 | 42 | 43 | 44 | |
| Lead (Pb) | mg/kg | LT 10 | LT 10 | LT 10 | 28 | LT 10 | 100 |
| Conclusion | - | PASS | PASS | PASS | PASS | PASS | - |

LT = Less Than

mg/kg = milligrams per kilogram (ppm = parts per million)

* = Average of duplicate analyses

<add "Remark" when Conclusion is "Exempted">

Remark:

According to Children's Products Containing Lead; Exemptions for Certain Electronic Devices; Interim Final Rule, exemptions were granted to steel alloy containing up to 0.35 % lead by weight/ aluminium containing up to 0.4 % lead by weight/ copper-based alloy containing up to 4 % lead by weight. Therefore, this material containing the found heavy metals level should be exempted.

According to Petition Requesting Exception from Lead Content Limits; Notice Granting Exception, exemptions were granted to certain aluminum alloy containing up to 0.03 % lead by weight. Therefore, this material containing the found heavy metals level should be exempted.



RESULTS:

SOLUBLE HEAVY METALS CONTENT IN SURFACE COATING (ASTM F963-23, Section 4.3.5.1(2))

Test Method : ASTM International Standard ASTM F963-23, Section 8.3.2 to 8.3.4

| Sample Identity | Color / Component | Location | Style |
|-----------------|----------------------|-------------|-------|
| 1 | Deep grey coating | Metal sheet | A |
| 2 | Dull grey coating | Metal sheet | A |
| 3 | Black coating | Metal sheet | A |
| 4 | Bright black coating | Metal sheet | A |
| 5 | Grey coating | Metal sheet | A |
| 6 | Brown coating | Metal sheet | A |
| 7 | Orange red coating | Metal sheet | A |
| 8 | Red coating | Metal sheet | A |
| 9 | Deep red coating | Metal sheet | A |
| 10 | Deep blue coating | Metal sheet | A |
| 11 | Blue coating | Metal sheet | A |
| 12 | Dull blue coating | Metal sheet | A |
| 13 | Deep green coating | Metal sheet | A |
| 14 | Green coating | Metal sheet | A |
| 15 | Light green coating | Metal sheet | A |
| 16 | Soft black coating | Logo | A |

| Parameter | Unit | Result | | | | | Limit |
|--------------------------|-------|--------|------|------|------|------|-------|
| | | 1 | 2 | 3 | 4 | 5 | |
| Arsenic (As) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 25 |
| Barium (Ba) | mg/kg | 41 | 83 | 25 | 170 | 10 | 1000 |
| Cadmium (Cd) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 75 |
| Chromium (Cr) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Mercury (Hg) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Lead (Pb) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 90 |
| Antimony (Sb) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Selenium (Se) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 500 |
| Mass of trace amount (g) | | - | - | - | - | - | - |
| Conclusion | | PASS | PASS | PASS | PASS | PASS | - |



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| Parameter | Unit | Result | | | | | Limit |
|--------------------------|-------|--------|------|------|------|------|-------|
| | | 6 | 7 | 8 | 9 | 10 | |
| Arsenic (As) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 25 |
| Barium (Ba) | mg/kg | 14 | 6 | 8 | 39 | 17 | 1000 |
| Cadmium (Cd) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 75 |
| Chromium (Cr) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Mercury (Hg) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Lead (Pb) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 90 |
| Antimony (Sb) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Selenium (Se) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 500 |
| Mass of trace amount (g) | | - | - | - | - | - | - |
| Conclusion | | PASS | PASS | PASS | PASS | PASS | - |

| Parameter | Unit | Result | | | | | Limit |
|--------------------------|-------|--------|------|------|------|------|-------|
| | | 11 | 12 | 13 | 14 | 15 | |
| Arsenic (As) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 25 |
| Barium (Ba) | mg/kg | 75 | 19 | 15 | 23 | 8 | 1000 |
| Cadmium (Cd) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 75 |
| Chromium (Cr) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Mercury (Hg) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Lead (Pb) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 90 |
| Antimony (Sb) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Selenium (Se) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 500 |
| Mass of trace amount (g) | | - | - | - | - | - | - |
| Conclusion | | PASS | PASS | PASS | PASS | PASS | - |

| Parameter | Unit | Result | Limit |
|--------------------------|-------|--------|-------|
| | | 16 | |
| Arsenic (As) | mg/kg | LT 2 | 25 |
| Barium (Ba) | mg/kg | LT 2 | 1000 |
| Cadmium (Cd) | mg/kg | LT 2 | 75 |
| Chromium (Cr) | mg/kg | LT 2 | 60 |
| Mercury (Hg) | mg/kg | LT 2 | 60 |
| Lead (Pb) | mg/kg | LT 2 | 90 |
| Antimony (Sb) | mg/kg | LT 2 | 60 |
| Selenium (Se) | mg/kg | LT 2 | 500 |
| Mass of trace amount (g) | | - | - |
| Conclusion | | PASS | - |

LT = Less Than

mg/kg = milligrams per kilogram (ppm=parts per million)

CR = adjusted analytical result

* = Average of duplicate analysis



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RESULTS:

SOLUBLE HEAVY METALS CONTENT IN SUBSTRATE (ASTM F963-23, Section 4.3.5.2(2)(b))

Test Method : ASTM International Standard ASTM F963-23, Section 8.3.5 (Excluding 8.3.5.5(3))

| Sample Identity | Color / Component | Location | Style |
|-----------------|----------------------|--------------|-------|
| 17 | Black plastic | Accessory | A |
| 18 | Yellow plastic | Accessory | A |
| 19 | White foam sticker | Back of logo | A |
| 20 | Grey plastic | Inner nut | A |
| 21 | Bright black plastic | Cap nut | A |

| Parameter | Unit | Result | | | | | Limit |
|---------------------------------|-------|--------|------|------|------|------|-------|
| | | 17 | 18 | 19 | 20 | 21 | |
| Arsenic (As) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 25 |
| Barium (Ba) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 1000 |
| Cadmium (Cd) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 75 |
| Chromium (Cr) | mg/kg | LT 2 | LT 2 | LT 2 | 7 | 7 | 60 |
| Mercury (Hg) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Lead (Pb) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 90 |
| Antimony (Sb) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 60 |
| Selenium (Se) | mg/kg | LT 2 | LT 2 | LT 2 | LT 2 | LT 2 | 500 |
| Mass of trace amount (g) | | - | - | - | - | - | - |
| Conclusion | | PASS | PASS | PASS | PASS | PASS | - |

mg/kg = milligrams per kilogram (ppm=parts per million) CR = adjusted analytical result
LT = Less Than ND = None Detected

Remark:

Textiles (natural or synthetic) are exempted for lead content requirement according to clarification of Toy Industry Association for ASTM F963-23. The lead content analysis result of corresponding material herein is for client's reference only.



RESULTS:

PHthalates Content in Children's Toys and Child Care Articles (Consumer Product Safety Improvement Act (CPSIA) of 2008, Section 108(a) and 108(c), 16 CFR 1307)

Test Method : With reference to U. S. CPSC-CH-C1001-09.3 (April 1, 2010) / CPSC-CH-C1001-09.4 (January 17, 2018).

| Sample Identity | Color / Component | Location | Style |
|-----------------|----------------------|--------------|-------|
| 1 | Deep grey coating | Metal sheet | A |
| 2 | Dull grey coating | Metal sheet | A |
| 3 | Black coating | Metal sheet | A |
| 4 | Bright black coating | Metal sheet | A |
| 5 | Grey coating | Metal sheet | A |
| 6 | Brown coating | Metal sheet | A |
| 7 | Orange red coating | Metal sheet | A |
| 8 | Red coating | Metal sheet | A |
| 9 | Deep red coating | Metal sheet | A |
| 10 | Deep blue coating | Metal sheet | A |
| 11 | Blue coating | Metal sheet | A |
| 12 | Dull blue coating | Metal sheet | A |
| 13 | Deep green coating | Metal sheet | A |
| 14 | Green coating | Metal sheet | A |
| 15 | Light green coating | Metal sheet | A |
| 16 | Soft black coating | Logo | A |
| 17 | Black plastic | Accessory | A |
| 18 | Yellow plastic | Accessory | A |
| 19 | White foam sticker | Back of logo | A |
| 20 | Grey plastic | Inner nut | A |
| 21 | Bright black plastic | Cap nut | A |

| | |
|-----------------------|------------------|
| Maximum Limit: | Each 0.1% |
|-----------------------|------------------|

| Test Item(s) | Result | | Unit | Conclusion |
|--------------|---------------------|-------|------|------------|
| | Detected Analyte(s) | Conc. | | |
| 1 + 2 + 3 | ND | ND | % | PASS |
| 4 + 5 + 6 | ND | ND | % | PASS |
| 7 + 8 + 9 | ND | ND | % | PASS |
| 10 + 11 + 12 | ND | ND | % | PASS |
| 13 + 14 | ND | ND | % | PASS |
| 15 + 16 | ND | ND | % | PASS |
| 17 + 18 + 19 | ND | ND | % | PASS |
| 20 + 21 | ND | ND | % | PASS |



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Results reported in percentage
Detection Limit: Each Phthalate (0.005%)

ND = None detected

| LIST OF RESTRICTED PHTHALATES | | |
|-------------------------------|---------------------------------------|-------------------------|
| Number | Chemical Name | CAS Number |
| 1. | Butyl benzyl phthalate (BBP) | 85-68-7 |
| 2. | Dibutyl phthalate (DBP) | 84-74-2 |
| 3. | Di(2-ethylhexyl) phthalate (DEHP) | 117-81-7 |
| 4. | Di-iso-nonyl phthalate (DINP) | 28553-12-0 & 68515-48-0 |
| 5. | Di-iso-butyl phthalate (DIBP) | 84-69-5 |
| 6. | Di-n-pentyl phthalate (DPENP or DnPP) | 131-18-0 |
| 7. | Di-n-hexyl phthalate (DHEXP or DnHP) | 84-75-3 |
| 8. | Dicyclohexyl phthalate (DCHP) | 84-61-7 |



RESULTS:

PHthalATES CONTENT IN CHILDREN'S TOYS (ASTM F963-23, Section 4.3.8)

Test Method : With reference to U. S. CPSC-CH-C1001-09.3 (April 1, 2010) / CPSC-CH-C1001-09.4 (January 17, 2018).

| Sample Identity | Color / Component | Location | Style |
|-----------------|----------------------|--------------|-------|
| 1 | Deep grey coating | Metal sheet | A |
| 2 | Dull grey coating | Metal sheet | A |
| 3 | Black coating | Metal sheet | A |
| 4 | Bright black coating | Metal sheet | A |
| 5 | Grey coating | Metal sheet | A |
| 6 | Brown coating | Metal sheet | A |
| 7 | Orange red coating | Metal sheet | A |
| 8 | Red coating | Metal sheet | A |
| 9 | Deep red coating | Metal sheet | A |
| 10 | Deep blue coating | Metal sheet | A |
| 11 | Blue coating | Metal sheet | A |
| 12 | Dull blue coating | Metal sheet | A |
| 13 | Deep green coating | Metal sheet | A |
| 14 | Green coating | Metal sheet | A |
| 15 | Light green coating | Metal sheet | A |
| 16 | Soft black coating | Logo | A |
| 17 | Black plastic | Accessory | A |
| 18 | Yellow plastic | Accessory | A |
| 19 | White foam sticker | Back of logo | A |
| 20 | Grey plastic | Inner nut | A |
| 21 | Bright black plastic | Cap nut | A |

| | |
|-----------------------|----------------------------|
| Maximum Limit: | Each Phthalate 0.1% |
|-----------------------|----------------------------|

| Test Item(s) | Result | | Unit | Conclusion |
|--------------|---------------------|-------|------|------------|
| | Detected Analyte(s) | Conc. | | |
| 1 + 2 + 3 | ND | ND | % | PASS |
| 4 + 5 + 6 | ND | ND | % | PASS |
| 7 + 8 + 9 | ND | ND | % | PASS |
| 10 + 11 + 12 | ND | ND | % | PASS |
| 13 + 14 | ND | ND | % | PASS |
| 15 + 16 | ND | ND | % | PASS |
| 17 + 18 + 19 | ND | ND | % | PASS |
| 20 + 21 | ND | ND | % | PASS |



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Results reported in percentage
Detection Limit: Each Phthalate (0.005%)

ND = None detected

| LIST OF RESTRICTED PHTHALATES | | |
|-------------------------------|---------------------------------------|-------------------------|
| Number | Chemical Name | CAS Number |
| 1. | Butyl benzyl phthalate (BBP) | 85-68-7 |
| 2. | Dibutyl phthalate (DBP) | 84-74-2 |
| 3. | Di(2-ethylhexyl) phthalate (DEHP) | 117-81-7 |
| 4. | Di-iso-nonyl phthalate (DINP) | 28553-12-0 & 68515-48-0 |
| 5. | Di-iso-butyl phthalate (DIBP) | 84-69-5 |
| 6. | Di-n-pentyl phthalate (DPENP or DnPP) | 131-18-0 |
| 7. | Di-n-hexyl phthalate (DHEXP or DnHP) | 84-75-3 |
| 8. | Dicyclohexyl phthalate (DCHP) | 84-61-7 |



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(*)RESULTS:



END OF REPORT