



Test Report

No.T32520321676SC

Date: Aug 04, 2025

Page 1 of 11

NEW LEADER GLOBAL DEVELOPMENT CO. LTD.

FLAT A. 4F, BLOCK 1, CAMELPAINT BUILDING, 62 HOI YUEN ROAD, KWUN TONG,
KOWLOON, HONG KONG

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

NL BRAND 1.5V CYLINDRICAL ALKALINE BATTERY

Case No. : CA325203223559
Style/Item No. : LR6, LR03
Manufacturer : NEW LEADER
Country of Origin : CHINA
Sample Receiving Date : JUL 24, 2025
Testing Period : JUL 24, 2025 – AUG 04, 2025

Selected test(s) as requested by the client, please refer to test result page(s) for details:

Test Requested		Conclusion
1.	Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 – Lead, Cadmium and Mercury Content	PASS
2.	US Public Law No 104-142 (1996) Title II –Mercury-Containing Battery Management Act – Mercury Content	PASS
3.	Mercury requirement in compliance with various USA States requirement	PASS

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

Signed for and on behalf of
SGS Hong Kong Ltd.

Lam Chi Ho, Jacko
Senior Chemist



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. Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 – Lead, Cadmium and Mercury Content

Method: With reference to IEC 62321-4:2013+AMD1:2017, IEC 62321-5:2013

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES) / Atomic Absorption Spectrometer (AAS) / Direct Mercury Analyzer (DMA)

For portable batteries:

Test Item(s)	Lead (Pb)	Cadmium (Cd)	Mercury (Hg)
MDL (%)	0.001	0.001	0.0001
Labeling Requirement (%)	> 0.004	--	--
Permissible Limit (%)	0.01	0.002 [#]	0.0005
Specimen Description	Result(s) (%)		
Cylinder battery (AA)	ND	ND	ND

- Note:
- % = percentage by weight
 - ND = Not Detected (lower than MDL)
 - 1% = 10000 mg/kg = 10000 ppm
 - > = greater than

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- [#] = Not applicable to portable batteries and accumulators intended to use in emergency and alarm systems and medical equipments
- ^{##} = According to (EU) 2023/1542, the corresponding chemical symbol beneath the cross-out wheeled bin logo is required if the heavy metal content in batteries and accumulators exceeded the values specified under labeling requirements.



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.

2. US Public Law No 104-142 (1996) Title II – Mercury-Containing Battery Management Act –Mercury Content

Method: IEC 62321-4:2013+AMD1:2017

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES) / Direct Mercury Analyzer (DMA)

For Battery except Alkaline Manganese Button Cell

Test Item(s)	Mercury (Hg)
MDL (mg/kg)	1
Requirement (mg/kg)	Prohibited
Specimen Description	Result(s) (mg/kg)
1. Cylinder battery (AA)	ND

- Note:
- mg/kg = milligram per kilogram
 - ND = Not Detected (lower than MDL)
 - 1% = 10000 mg/kg = 10000 ppm

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- * Do not meet requirement



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.

3. Mercury requirement in compliance with various USA States requirement

Method: With reference to IEC 62321-4:2013+AMD1:2017

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES) / Direct Mercury Analyzer (DMA)

Test Item(s)	Mercury (Hg)
MDL (mg/kg)	1
Requirement (mg/kg)	Prohibited
Specimen Description	Result(s) (mg/kg)
1. Cylinder battery (AA)	ND

- Note:
- mg/kg = milligram per kilogram
 - ND = Not Detected (lower than MDL)
 - 1% = 10000 mg/kg = 10000 ppm



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.

Region	Act/Regulation	Scope	Effective Date
Connecticut State	Public Act 06-181 (HB 5446, 2006)	Button cell batteries containing mercury	July 1, 2011
		Button cell batteries used in Medical device for delivering insulin	January 1, 2015
		Silver oxide button cell batteries	July 1, 2012
Maine State	Public Law, Chapter 86 (LD 1026, 124th Maine State Legislature)	Mercury-added button cell batteries: 1. Zinc- air button cell battery 2. Alkaline manganese button cell battery 3. Silver oxide button cell stamped with the designation SR357, SR 364, SR371, SR377, SR395, SR44W, SR621SW, SR626SW, SR920SW or SR927SW	January 1, 2012
		Mercury-added silver oxide button cell batteries	January 2, 2015
Rhode Island State	H 6396, Chapter 387 (2007)	Mercury-added button cell batteries	July 1, 2011
		Silver oxide button cell batteries	January 1, 2012
Ohio State	Chapter 3734: Solid and Hazardous Wastes RC § 3734. 64 "Sale of mercury- added novelty for promotional purposes"	Mercury-added novelty products intended mainly for personal or household enjoyment or adornment including but not limited to products intended for use as practical jokes, figurines, adornments, toys, games, cards, ornaments, yards statues and figures, candles, jewelry, holiday decorations, footwear, other items of apparel, or similar products	December 4, 2007
		Mercury-added novelty products containing removable button cell batteries	January 1, 2011



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.

Remark:

When statement of conformity is made, unless inherent in the requested specification, 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%.”



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.

Sample Photo:

Pic.1



Pic.2



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.

Pic.3



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.

Pic.4



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.

Pic.5



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.

Pic.6



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-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.