

NAILLEGEND

Soap Flower

Compliance & Technical Dossier

Hand-Rolled Bouquet · Gift-Box Flower · Single-Stem / Corsage · Melt-&-Pour Moulded

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0. Dossier Overview & Legal Notice

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Soap Flower **Document:** Compliance & Technical Dossier — Overview | **Issue date:** 2026-06-22 | **Version:** 1.0

What this dossier is

This is the **Compliance & Technical Dossier** for the NailLegend **Soap Flower** category (hand-rolled bouquet, gift-box flower, single-stem / corsage, and melt-&-pour moulded forms). It brings together, in one document, the technical and regulatory information a brand-owner, gift retailer or distributor needs when sourcing this product on an OEM / Private-Label basis for the **US (FDA / CPSC)** and **EU (Regulation EC 1223/2009)** markets.

A soap flower is, at its core, a **decorative, scented soap** sold as a gift item. The data in this dossier are **representative of NailLegend's standard production** for this category. They are typical values issued by NailLegend's in-house quality function. For a specific order, the figures are reconfirmed against the **final agreed soap base, colour and fragrance** and against the production batch, and batch-specific certificates of analysis are issued with shipment.

Regulatory responsibility

Final market-placement responsibility — US classification and labelling (CPSC for a true cleansing soap; FDA cosmetic listing under MoCRA once cosmetic or non-soap claims/ingredients apply), EU CPNP notification, appointment of the EU Responsible Person, the Cosmetic Product Safety Report (CPSR), the Product Information File (PIF), and final labelling and claims — rests with the **brand owner / importer**. NailLegend, as the manufacturer, supplies the supporting technical documents in this dossier to enable that work.

Claims & classification guardrails

How a soap flower is **classified depends on what it claims and what it contains:**

- A product presented **only as a cleansing/decorative soap** (alkali-fatty-acid soap base, no skin-care or therapeutic claim) is regulated in the US by the **CPSC**, not as a cosmetic or drug.
- Adding a **skin-care claim** ("moisturizing," "softening") or non-soap functional ingredients moves it to **FDA cosmetic** regulation.
- Any **therapeutic claim** ("antibacterial," "treats," "heals") reclassifies it as a **drug**.

NailLegend supplies soap flowers as **decorative, scented soap**. Keep on-pack wording to "*decorative soap flower / scented*," not skin-care or therapeutic claims. Because the product looks like a real flower, the on-pack **non-edible / keep away from children** warning must be present (see Section 2).

How to read the data

- **Composition & specification** (INCI, TDS, formulation disclosure, fragrance allergen, IFRA and colourant statements) describe the product as manufactured.
- **Test sections** (stability) present the applicable **methods, acceptance criteria, and typical results** for this product, issued by NailLegend's in-house QC. They represent standard production

performance; batch-specific certificates accompany each shipment.

- **No preservative-efficacy or microbiological challenge data are included:** a soap flower is a **solid, low-water-activity soap** that does not support microbial growth and is not a water-containing emulsion (see Section 2).

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1. INCI Ingredient List

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Soap Flower **Document:** INCI Ingredient List (representative — soap-base flower) | **Issue date:** 2026-06-22 | **Version:** 1.0

The list below is the representative INCI composition for the Soap Flower. The definitive descending-order list and on-pack allergen call-outs are confirmed against the final agreed soap base, colour and fragrance for each order before use on artwork or for CPNP notification. Ingredients in *italics* are line-dependent (soap-base route, colour effect, fragrance type). Two soap-base routes are offered — **saponified soap noodles** (hand-rolled bouquet, main route) and **melt-&-pour glycerin base** (moulded form); the relevant base block applies per order.

INCI declaration (descending order)

#	INCI name	Function
1	Sodium Palmate	Soap base — saponified palm-oil fatty acid (noodle route)
2	Sodium Cocoate	Soap base — saponified coconut-oil fatty acid
3	<i>Sodium Palm Kernelate</i>	Soap base — co-surfactant (noodle route)
4	Aqua (Water)	Residual moisture / process water
5	Glycerin	Plasticiser / humectant (keeps petals pliable; high in M&P base)
6	<i>Sorbitol</i>	Plasticiser / transparency (melt-&-pour base)
7	<i>Sodium Stearate</i>	Soap base / hardness (melt-&-pour base)
8	<i>Propylene Glycol</i>	Solvent / transparency (melt-&-pour base)
9	<i>Sodium Laureth Sulfate</i>	Surfactant (melt-&-pour base)
10	Sodium Chloride	Process / hardness aid
11	Tetrasodium EDTA	Chelating agent
12	Tetrasodium Etidronate	Chelating / antioxidant aid
13	<i>Titanium Dioxide (CI 77891)</i>	Opacifier / white base
14	<i>Mica (CI 77019)</i>	Pearl / shimmer effect
15	<i>CI 1xxxx / CI 7xxxx colourants</i>	Petal colour (see Section 7)
16	<i>Parfum (Fragrance)</i>	Fragrance (floral type; main sensory selling point)
17	<i>Limonene, Linalool, Citronellol, Geraniol, Citral</i>	Fragrance allergens (declared at threshold — see Section 5)

Notes for labelling

- **Ordering** is representative of standard production; the exact descending-order list is issued for the locked soap base and recipe of each order.
- **Two base routes:** a saponified noodle flower lists *Sodium Palmate / Sodium Cocoate* etc.; a melt-&-pour moulded flower lists *Glycerin / Sorbitol / Sodium Stearate / SLES* etc. The artwork uses the route actually supplied.
- **EU fragrance allergens** present at or above the labelling threshold appear in the on-pack INCI list — see Section 5. Because fragrance dosage is high in this product, several allergens are typically declarable.
- **Colourants** are listed by Colour Index (CI) number and sit within the target-market permitted lists — see Section 7.
- **No added preservative is required** in this solid, low-water-activity soap; chelants (EDTA / etidronate) are present mainly to protect colour and limit rancidity, not as antimicrobial preservatives.

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2. Technical Data Sheet (TDS)

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Soap Flower **Document:** Technical Data Sheet (representative specification) | **Issue date:** 2026-06-22 | **Version:** 1.0

1. Product description

A **decorative, scented soap** shaped to resemble a flower. The petals are produced by one of two routes: **saponified soap noodles** thin-sliced and **hand-rolled** into petals and assembled into a bouquet (main route, highest realism), or **melt-&-pour glycerin base** cast in a flower mould (moulded form). The finished item is scented, coloured to brief, and presented in a gift box. It is a **solid soap**; cleansing is a secondary, incidental function — the product is sold as a gift / decorative item.

2. Physical & chemical specification (typical)

Property	Specification	Method
Physical form	Solid moulded / hand-rolled soap petals (flower / bouquet)	Visual
Appearance	Flower-shaped petals; opaque (noodle/TiO ₂) or translucent (M&P)	Visual
Odour	Characteristic of fragrance dosed (floral type)	Olfactory
Colour	To brief (single / two-tone / gradient / pearl)	Visual — see Section 7
pH (1% aqueous solution, 25 °C)	9.0 – 10.5 (alkali-fatty-acid soap)	pH meter, 1% solution
Moisture / volatile content	8 – 15% (noodle) / 10 – 20% (melt-&-pour, glycerin-rich)	Loss on drying
Water activity (a _w)	≤ 0.75 (typical 0.5 – 0.7) — does not support microbial growth	a _w meter
Total fatty matter (noodle route)	≥ 70%	Titration
Unit weight	To brief (per petal / per stem / per bouquet)	Gravimetric
Free caustic alkali	≤ 0.1%	Titration

Why no preservative / microbiological section: the product is a **solid, low-water-activity soap** (a_w ≤ 0.75) with a high pH. It is not a water-containing emulsion and does not support microbial growth, so a preservative-efficacy (challenge) test and routine microbiological challenge testing are **not applicable**. Stability is covered in Section 8.

3. Sensory & decorative specification

Item	Typical
Fragrance dosage	1.0 – 3.0% of soap mass (high — drives the gift "open-box" scent; see Sections 5 & 6)
Colour effect	Single / two-tone / gradient / pearl (mica) — see Section 7
Petal pliability (noodle route)	Pliable, foldable when fresh (glycerin-plasticised); becomes firmer on ageing

4. Packaging & primary material

- **Primary:** assembled flower / bouquet seated on a cushioned tray or insert inside a **gift box** (flip-top / drawer / window / acrylic) — the box and protective insert are functional, guarding against crush and moisture/"sweating" (standard, not optional).
- **Secondary:** carton / multi-pack / master export carton to brief.
- Desiccant / moisture-barrier wrap is used where transit humidity warrants (especially glycerin-rich melt-&-pour flowers, which can sweat).

5. Storage, shelf life & usage

Item	Value
Storage	Cool, dry place, away from direct sunlight and high humidity; 5 – 30 °C
Shelf life	24 months unopened in gift packaging (kept dry)
Directions	Decorative scented soap. Display as a flower; to use, peel a petal and wash hands, then rinse.
Warnings	Not edible — looks like a flower but is soap. Keep away from children and pets; choking / ingestion hazard. External use only. Avoid contact with eyes; rinse if contact occurs. Soap may stain fabrics.

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3. Safety Data Sheet (SDS)

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Soap Flower **Document:** Safety Data Sheet — GHS 16-section (representative) | **Issue date:** 2026-06-22 | **Version:** 1.0

Prepared in the UN GHS 16-section format (aligned with US OSHA HazCom 29 CFR 1910.1200 and EU REACH Annex II). The finished product is a solid, decorative scented soap; classification below reflects the representative formula. Batch- or formula-specific SDS is reissued where the agreed soap base, colour or fragrance differs.

- 1. Identification** — Product: Soap Flower (decorative scented soap). Use: decorative / cleansing soap, external use. Supplier: NailLegend (naillegend.com). Contact: Lareina. Emergency: contact supplier during business hours.
- 2. Hazard identification** — GHS classification: Eye Irrit. 2 — H319 (soap; may cause eye irritation). Solid, not flammable under normal conditions. Signal word: Warning. Precautionary statements: P264 (wash hands after handling), P280 (eye protection — bulk handling), P305+P351+P338 (if in eyes, rinse), P337+P313 (if eye irritation persists, get advice). **Non-edible decorative item resembling a flower** — keep away from children; choking/ingestion hazard.
- 3. Composition / information on ingredients** — Mixture (solid soap). Components of note: soap base — Sodium Palmate / Sodium Cocoate (saponified fatty acids) or melt-&-pour glycerin base (Glycerin, Sorbitol, Sodium Stearate, Sodium Laureth Sulfate CAS 9004-82-4); Glycerin (CAS 56-81-5); Titanium Dioxide (CAS 13463-67-7); fragrance and colourants within cosmetic use limits. Full composition: see Section 1 (INCI).
- 4. First-aid measures** — Eyes: rinse with water for several minutes; remove contact lenses; seek advice if irritation persists. Skin: rinse with water if soap residue causes irritation. Ingestion: do **not** induce vomiting; rinse mouth, drink water, seek medical advice — product resembles a flower but is soap. Inhalation: not a normal route of exposure.
- 5. Fire-fighting measures** — Solid; not readily flammable. Suitable extinguishing media: water spray, foam, CO₂, dry powder.
- 6. Accidental release** — Collect solid pieces; soap dissolved in water is slippery — avoid slip hazard. Avoid bulk release of soap solution to drains.
- 7. Handling & storage** — Handle per good hygiene practice; wash hands after handling. Store cool, dry, out of direct sunlight; keep packaging closed and protected from humidity to prevent sweating/softening.
- 8. Exposure controls / PPE** — Consumer use: no PPE required. Bulk handling (manufacturing): eye protection and gloves; no specific occupational exposure limit assigned to the finished mixture.
- 9. Physical & chemical properties** — Solid soap. Appearance, odour, pH (1% solution), moisture and water activity: see Section 2 (TDS). Flash point: not applicable (solid soap). Solubility: soluble / dispersible in water.
- 10. Stability & reactivity** — Stable under recommended storage. Incompatibilities: strong acids and strong oxidisers. High humidity causes softening / "sweating" (especially glycerin-rich melt-&-pour).

Hazardous decomposition products: none under normal use.

11. Toxicological information — Finished soap confirmed safe for normal use through the brand owner's safety assessment. May cause eye irritation. Not intended for ingestion; resembles food/flower — keep from children.

12. Ecological information — Soap is readily biodegradable; no significant adverse effects expected in normal consumer use. Avoid bulk discharge to the environment.

13. Disposal — Dispose of contents and packaging in accordance with local regulations.

14. Transport information — Not classified as dangerous goods for transport (finished solid soap). UN number: none.

15. Regulatory information — Finished soap / decorative scented soap. US: CPSC (true soap, cleansing/decorative) or FDA cosmetic (MoCRA) where cosmetic claims/ingredients apply. EU: Regulation (EC) 1223/2009 (soap regulated as a cosmetic). Ingredients comply with applicable cosmetic inventories for the declared markets.

16. Other information — Abbreviations: M&P melt-&-pour; a_w water activity; CI Colour Index. An SDS is not legally mandatory for a finished cosmetic/soap in all markets but is commonly requested by importers and logistics partners; this SDS is provided for that purpose.

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4. Formulation Disclosure Statement

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Soap Flower **Document:** Formulation Disclosure Statement | **Issue date:** 2026-06-22 | **Version:** 1.0

This statement gives the brand owner's safety assessor the functional composition and permitted-range information needed to build the CPSR / PIF, while protecting NailLegend's specific know-how. Exact weight percentages of the locked formula are disclosed **confidentially to the named safety assessor under NDA**; this statement provides the functional framework and confirms each restricted ingredient sits within its permitted limit.

1. Functional composition framework

Block	Function	Representative ingredients
Soap base — saponified (noodle route)	Solid body, cleansing, petal pliability	Sodium Palmate, Sodium Cocoate, Sodium Palm Kernelate
Soap base — melt-&-pour (moulded route)	Castable transparent/opaque body	Glycerin, Sorbitol, Sodium Stearate, Propylene Glycol, Sodium Laureth Sulfate
Plasticiser / humectant	Keep petals foldable, control brittleness	Glycerin, Sorbitol
Chelant / antioxidant aid	Protect colour, limit rancidity	Tetrasodium EDTA, Tetrasodium Etidronate
Colour	Petal colour & pearl effect	Titanium Dioxide, Mica, CI colourants (Section 7)
Sensory	Fragrance (high dosage — gift scent)	Parfum (floral type)

2. Restricted-ingredient confirmation

Ingredient (class)	Permitted basis	This product
Fragrance & allergens	IFRA-compliant; allergens declared at threshold	High dosage (1–3%) — see Sections 5 & 6
Colourants	EU Annex IV / US permitted colour additive	Within permitted list — see Section 7
Titanium Dioxide (CI 77891)	Permitted colourant (Annex IV) — used in solid, non-spray soap	Within permitted use
Tetrasodium EDTA / Etidronate (chelant)	Standard cosmetic use	≤ 0.5% combined
Preservative	Not required — solid, low-water-activity soap	None added (no antimicrobial preservative)
Free caustic alkali	Soap quality limit	≤ 0.1%

3. What is and is not disclosed

- **Disclosed openly:** the functional framework, soap-base route, restricted-ingredient identities, and confirmation each is within its permitted limit.
- **Disclosed under NDA to the safety assessor only:** exact weight percentages of the locked formula, the soap-noodle fatty-acid blend and ratio, supplier identities, and process parameters.
- **Not disclosed:** proprietary petal-forming and hand-rolling process know-how unrelated to safety assessment.

4. Manufacturer statement

For the locked formula supplied to a customer, NailLegend confirms that all ingredients are used within the limits and conditions permitted for cosmetic / soap use in the customer's declared target markets, and that supporting analytical data (stability; fragrance allergen, IFRA and colourant statements) is provided in this dossier. No antimicrobial preservative is added because the product is a solid, low-water-activity soap.

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NailLegend · naillegend.com — Functional disclosure for safety-assessment support; exact percentages under NDA. Confidential — for the intended recipient only.

5. Fragrance Allergen Declaration

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Soap Flower **Document:** EU Fragrance Allergen Declaration | **Issue date:** 2026-06-22 | **Version:** 1.0

Basis: EU Regulation (EC) 1223/2009. For a **leave-on** product, allergens present at $\geq 0.001\%$ (**10 ppm**) must be named in the on-pack INCI list; for a **rinse-off** product the threshold is $\geq 0.01\%$ (**100 ppm**). A soap flower is displayed (leave-on while on show) and used as a wash item, and brand owners generally apply the **stricter leave-on 10 ppm threshold** for safety. **This is the focus document for soap flower:** fragrance is dosed high ($\approx 1\text{--}3\%$ of soap mass) to drive the "open-box" scent, so multiple allergens are present **well above threshold and almost always require on-pack declaration**. Content is reconfirmed by the fragrance supplier for the specific fragrance of each order; an **unscented** variant declares "none present." (Note: Reg. (EU) 2023/1545 expands the declarable list to ~ 80 allergens — the supplementary sheet is added where the target market requires it.)

Allergen content (representative – rose-type floral fragrance @ 2.0% in soap)

#	Allergen (INCI)	CAS	Present	% in product	On-pack declaration (leave-on 10 ppm)
1	Citronellol	106-22-9	Yes	0.1600	Required
2	Geraniol	106-24-1	Yes	0.1400	Required
3	Linalool	78-70-6	Yes	0.0900	Required
4	Citral	5392-40-5	Yes	0.0260	Required
5	Limonene	5989-27-5	Yes	0.0220	Required
6	Hydroxycitronellal	107-75-3	Yes	0.0150	Required
7	Eugenol	97-53-0	Yes	0.0120	Required
8	Geranyl Acetate (as Geraniol)	105-87-3	Yes	0.0080	Required
9	Farnesol	4602-84-0	Yes	0.0040	Required
10	Benzyl Salicylate	118-58-1	Yes	0.0030	Required
11	Coumarin	91-64-5	Yes	0.0018	Required
12	Benzyl Alcohol	100-51-6	Yes	0.0014	Required
—	Isoeugenol, Cinnamal, Cinnamyl Alcohol, Amyl Cinnamal, Hexyl Cinnamal, Benzyl Benzoate, Anise Alcohol, others	various	No / trace	< 0.0010	Not required (below threshold)

On-pack declaration required for this fragrance: *Citronellol, Geraniol, Linalool, Citral, Limonene, Hydroxycitronellal, Eugenol, Farnesol, Benzyl Salicylate, Coumarin, Benzyl Alcohol.*

Because of the high fragrance load, a typical floral soap flower triggers **roughly 10–12 declarable allergens** — far more than a lightly-fragranced leave-on. The brand owner must include all "Required" allergens in the on-pack INCI list. Different floral types (jasmine, gardenia, lavender, osmanthus) change which allergens dominate; the supplier sheet is reissued per fragrance.

Declaration

For the fragrance dosed in this product, the allergens marked "Required" above are included in the on-pack INCI list. An **unscented** variant contains no added fragrance allergens. Values are reconfirmed by the fragrance supplier for the specific fragrance and dosage of each order.

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6. IFRA Conformity Statement

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Soap Flower **Document:** IFRA Conformity Statement | **Issue date:** 2026-06-22 | **Version:** 1.0

This statement is supported by the **IFRA Certificate of Conformity issued by the fragrance supplier** for the specific fragrance compound and its dosage. The fragrance supplier's certificate is held on file and provided to the brand owner's safety assessor on request. An **unscented** variant requires no IFRA statement.

1. Product use category

Item	Value
Product type	Soap Flower (decorative scented soap; hand contact, rinse-off in use)
IFRA product category	Category 9 (rinse-off products incl. bar/solid soap)
Fragrance dosage in finished product	2.0% (representative; range 1–3% to brief)
IFRA Standards edition	51st Amendment

2. Conformity statement

The fragrance compound used at **2.0%** in this Soap Flower conforms to the **IFRA Standards (51st Amendment)** for the applicable product category. All restricted, prohibited and specified materials are within the maximum levels set by the relevant IFRA Standards for this use, as confirmed by the fragrance supplier's IFRA Certificate of Conformity held on file. Because this product carries a high fragrance load, IFRA category limits are checked specifically against the dosed level for each fragrance.

3. Relationship to allergen labelling

IFRA conformity governs **safe use levels** and is separate from EU **allergen labelling** (declaring allergens at threshold). Given the high fragrance dosage, allergen labelling is the more demanding obligation for this product — allergen content for the dosed fragrance is reported in Section 5.

4. Authorisation

Confirmed on the basis of the fragrance supplier's IFRA certificate for the dosed fragrance.

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7. Colourant Compliance Statement

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Soap Flower **Document:** Colourant Compliance Statement | **Issue date:** 2026-06-22 | **Version:** 1.0

Colour is a primary selling feature of a soap flower (single, two-tone, gradient and pearl effects). Every colourant used sits within the **permitted colour additive lists of the declared target market: US FD&C / D&C colour additives (21 CFR Parts 73, 74, 82)** and **EU Regulation (EC) 1223/2009 Annex IV**. The specific colourants are confirmed against the final agreed colourway for each order before use on artwork.

1. Representative colourant palette

Colourant (INCI / common)	Colour Index	EU Annex IV	US permitted basis	Typical use
Titanium Dioxide	CI 77891	Listed	21 CFR 73.2575	White / opacifying base
Mica	CI 77019	Listed	21 CFR 73.2496	Pearl / shimmer
Iron Oxides (red/yellow/black)	CI 77491 / 77492 / 77499	Listed	21 CFR 73.2250	Earth tones, Morandi palette
FD&C Red 40 / Allura Red AC	CI 16035	Listed (E 129)	21 CFR 74.1340	Pink / red petals
FD&C Yellow 5 / Tartrazine	CI 19140	Listed (E 102)	21 CFR 74.1705	Yellow petals
FD&C Blue 1 / Brilliant Blue	CI 42090	Listed (E 133)	21 CFR 74.1101	Blue / blended tones
Ultramarines	CI 77007	Listed	21 CFR 73.2725	Blue / violet

Exact colourants are selected per colourway; the table above is representative. For each order, NailLegend confirms that the colourants used appear in the permitted list for **each declared market** and are used within any conditions/limits stated there (e.g. application restrictions, purity criteria).

2. Conditions of use

- Colourants are used only for **petal colour and pearl effect**; none is used to make a therapeutic or skin-care claim.
- **Soluble dyes** may transfer slightly to wet hands/cloth in use; this is a normal cosmetic colourant behaviour and the on-pack notes advise that soap may stain fabrics.
- Where a market restricts a colourant to "rinse-off" or excludes eye-area use, the brand owner is advised; a soap flower is a non-eye-area, rinse-in-use product.

3. Manufacturer statement

For the locked colourway supplied to a customer, NailLegend confirms that all colourants are listed and permitted for cosmetic / soap use in the customer's declared target markets (US FD&C/D&C; EU Annex IV) and are used within their stated conditions.

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8. Stability Test Report

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Soap Flower **Document:** Stability Test Report — representative result | **Issue date:** 2026-06-22 | **Version:** 1.0

Physical, chemical and packaging-compatibility stability supporting shelf life, tested in market packaging (gift box with cushioned insert; moisture-barrier wrap where used). For a solid soap the main risks are **colour fade, fragrance loss/oxidation, moisture pick-up ("sweating"/white bloom), and petal deformation** — not microbial growth. Results are **typical of NailLegend standard production**, issued by NailLegend in-house QC. Batch-specific stability is monitored under the ongoing programme.

Reference batch (example): **SF-2406-01**

1. Study design

Condition	Temperature / humidity	Pull points
Real-time	25 ± 2 °C / 60% RH	0, 3, 6, 12, 24 months
Accelerated	40 ± 2 °C / 75% RH	0, 1, 2, 3 months
High-humidity (sweat / bloom)	30 °C / 80% RH	0, 1, 2 months
Light exposure (colour fade)	Window-glass / D65 per protocol	per protocol

Packaging tested: gift box with cushioned insert (± moisture-barrier wrap).

2. Parameters & results (typical)

Parameter	Acceptance	T0	Accel. 3 mo	Real-time 12 mo	Pass/Fail
Appearance / petal shape (no deform/crack)	Conforms	Conforms	Conforms	Conforms	Pass
Colour (no significant fade / bleed)	Within range	Pass	Slight, within range	No significant change	Pass
Odour (no rancidity; fragrance retained)	No rancidity	Pass	Pass	Pass	Pass
pH (1% solution)	Target ± 0.5	9.8	9.7	9.7	Pass
Moisture / volatile content	Spec range	Within	Within	Within	Pass
Surface sweating / white bloom	None visible	None	None	None	Pass
Free caustic alkali	≤ 0.1%	Pass	Pass	Pass	Pass
Water activity (a _w)	≤ 0.75	0.62	0.63	0.62	Pass

High-humidity (30 °C / 80% RH) challenge: glycerin-rich melt-&-pour samples showed slight surface sweating without moisture-barrier wrap, controlled to "none visible" with the wrap — confirming the packaging requirement in Section 2 (TDS).

3. Conclusion

Based on accelerated and real-time data, the assigned shelf life is **24 months** unopened in the gift packaging, kept dry. Real-time study to 24 months is ongoing and confirms stability to date. No microbiological stability data are required — the product is a solid, low-water-activity soap ($a_w \leq 0.75$; see Section 2). Overall result: **PASS (real-time ongoing)**.

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