

RF EXPOSURE REPORT



Applicant: LEDGER SAS
106 Rue du Temple, 75003 Paris, France
Manufacturer: LEDGER SAS
106 Rue du Temple, 75003 Paris, France
Product Name: Ledger Nano Gen5
Brand Name: [L] or [LEDGER]
Model No.: 1403
FCC ID 2ASAL-1403
Date of EUT Received: Sep. 02, 2025
Issue Date: Oct. 13, 2025

Approved By

John Yeh

We hereby certify that:

The above equipment was evaluated by SGS Taiwan Ltd. The evaluation in this report is in compliance with FCC Rule Part §2.1093, KDB 447498 D01 v06.

The results of this report relate only to the sample identified in this report.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 90 days only.
除非另有說明，此報告結果僅對測試之樣品負責，同時此樣品僅保留90天。本報告未經本公司書面許可，不可部份複製。

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.tw/Terms-and-Conditions> and for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com.tw/Terms-and-Conditions>. 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.

SGS Taiwan Ltd.

No.134, Wu Kung Road, New Taipei Industrial Park, Wuku District, New Taipei City, Taiwan/新北市五股區新北產業園區五工路 134 號

台灣檢驗科技股份有限公司

t (886-2) 2299-3279

f (886-2) 2298-0488

www.sgs.com.tw

Member of SGS Group

Revision History

Report Number	Revision	Description	Issue Date	Revised By	Remark
TESA2509000643ES	00	Original	Oct. 13, 2025	Kimmy Chiou	

Note:

- 1、The remark "" indicates modification of the report upon requests from certification body.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 90 days only.

除非另有說明，此報告結果僅對測試之樣品負責，同時此樣品僅保留90天。本報告未經本公司書面許可，不可部份複製。

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.tw/Terms-and-Conditions> and for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com.tw/Terms-and-Conditions>. 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.

SGS Taiwan Ltd.

No.134,Wu Kung Road, New Taipei Industrial Park, Wuku District, New Taipei City, Taiwan/新北市五股區新北產業園區五工路 134 號

台灣檢驗科技股份有限公司

t (886-2) 2299-3279

f (886-2) 2298-0488

www.sgs.com.tw

Member of SGS Group

Table of Contents

1	DESCRIPTION OF EQUIPMENT UNDER TEST (EUT)	4
1.1	Product Description	4
1.2	Evaluation site	4
1.3	Antenna Information:	4
2	rf EXPOSURE EVALUATION FOR PORTABLE CONDITIONS	5
2.1	FCC Standard Applicable:	5
2.2	Measurement Result:	6
2.3	Estimated SAR for simultaneous transmission	8

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 90 days only.

除非另有說明，此報告結果僅對測試之樣品負責，同時此樣品僅保留90天。本報告未經本公司書面許可，不可部份複製。

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.tw/Terms-and-Conditions> and for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com.tw/Terms-and-Conditions>. 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.

SGS Taiwan Ltd.

No.134,Wu Kung Road, New Taipei Industrial Park, Wuku District, New Taipei City, Taiwan/新北市五股區新北產業園區五工路 134 號

台灣檢驗科技股份有限公司

t (886-2) 2299-3279

f (886-2) 2298-0488

www.sgs.com.tw

Member of SGS Group

1 DESCRIPTION OF EQUIPMENT UNDER TEST (EUT)

1.1 Product Description

Product Name:	Ledger Nano Gen5
Brand Name:	[L] or [LEDGER]
Model No.:	1403

1.2 Evaluation site

Laboratory	Site Address		FCC Designation number/ Registration Number	ISED Company Number	CAB Identifier
SGS Taiwan Ltd. Central RF Lab. (TAF code 3702)	☐	No. 134, Wu Kung Road, New Taipei Industrial Park, Wuku District, New Taipei City, 24803, Taiwan.	TW0027/ 891563	4620A	TW3702
	☒	No. 2, Keji 1st Rd., Guishan Township, Taoyuan County, 333 Taiwan.	TW0028/ 200037	4620E	
	☐	1F, No. 8, Alley 15, Lane 120, Sec. 1, Nei Hu Road, Nei Hu District, Taipei City, 222 Taiwan.	TW0029/ 150169	23862	

1.3 Antenna Information:

Antenna Type	Supplier	Freq. (MHz)	Peak Antenna Gain (dBi)
Internal	LEDGER SAS	2.4GHz	-4.28

Note: Antenna information is provided by the applicant.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 90 days only.

除非另有說明，此報告結果僅對測試之樣品負責，同時此樣品僅保留90天。本報告未經本公司書面許可，不可部份複製。

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.tw/Terms-and-Conditions> and for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com.tw/Terms-and-Conditions>. 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.

SGS Taiwan Ltd.

No.134,Wu Kung Road, New Taipei Industrial Park, Wuku District, New Taipei City, Taiwan/新北市五股區新北產業園區五工路 134 號

台灣檢驗科技股份有限公司

t (886-2) 2299-3279

f (886-2) 2298-0488

www.sgs.com.tw

Member of SGS Group

2 RF EXPOSURE EVALUATION FOR PORTABLE CONDITIONS

2.1 FCC Standard Applicable:

According to §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensure that the public is not exposed to radio frequency energy level in excess of the Commission's guideline.

2.1.1 As per KDB 447498 D01 4.3.1,

Step a: For 100 MHz to 6 GHz and test separation distances ≤ 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

$$\left[\frac{\text{max. power of channel, including tune-up tolerance, mW}}{\sqrt{f(\text{GHz})}} \right] \leq 3.0 \text{ for 1-g Head \& Body SAR and } \leq 7.5 \text{ for 10-g extremity Hand SAR, where}$$

- $f(\text{GHz})$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- The values 3.0 and 7.5 are referred to as numeric thresholds in **step b)** below

Step b: For 100 MHz to 6 GHz and test separation distances > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following (also illustrated in Appendix B):

- 1) $\{[\text{Power allowed at numeric threshold for 50 mm in step a)}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)]\}$ mW, for 100 MHz to 1500 MHz
- 2) $\{[\text{Power allowed at numeric threshold for 50 mm in step a)}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot 10]\}$ mW, for > 1500 MHz and ≤ 6 GHz

Step c: For frequencies below 100 MHz, the following may be considered for SAR test exclusion (also illustrated in Appendix C):

- 1) For test separation distances > 50 mm and < 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by $[1 + \log(100/f(\text{MHz}))]$
- 2) For test separation distances ≤ 50 mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$
- 3) SAR measurement procedures are not established below 100 MHz

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 90 days only.
除非另有說明，此報告結果僅對測試之樣品負責，同時此樣品僅保留90天。本報告未經本公司書面許可，不可部份複製。

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.tw/Terms-and-Conditions> and for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com.tw/Terms-and-Conditions>. 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.



2.2 Measurement Result:

Step a:

This is a portable device and the max. output power including tune-up tolerance is 1 (mW), lower than the threshold given and derived as formula given above, where

$$=1(\text{mW})/5(\text{mm})\cdot\sqrt{2.48(\text{GHz})} = 0.314960314960472 < 3.0$$

Frequency (MHz)	Max. output power including tune-up tolerance(dBm)	Max. output power including tune-up tolerance(mW)	Distance (mm)	Result	≤ 3.0 for 1-g SAR
2480	0	1	5	0.315	TRUE

As the result of calculation result indicates, the RF exposure generating from given transmitter (transmitter employed digital modulation) can be excluded from SAR measurement, and is deemed compliant with RF exposure as per FCC.

Conclusion: Source-base time average power is below Exemption Criteria and/or Routine Evaluation MPE thresholds, therefore the device is compliant FCC RF exposure requirement.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 90 days only.
除非另有說明，此報告結果僅對測試之樣品負責，同時此樣品僅保留90天。本報告未經本公司書面許可，不可部份複製。

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.tw/Terms-and-Conditions> and for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com.tw/Terms-and-Conditions>. 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.

SGS Taiwan Ltd.

No.134,Wu Kung Road, New Taipei Industrial Park, Wuku District, New Taipei City, Taiwan/新北市五股區新北產業園區五工路 134 號

台灣檢驗科技股份有限公司

t (886-2) 2299-3279

f (886-2) 2298-0488

www.sgs.com.tw

Member of SGS Group



2.2.1 As per KDB447498D01v06 4.3.1 c)

Based on KDB447498D01v06 4.3.1 c), SAR test exclusion threshold for NFC (13.56MHz) shall be evaluated as below,

- a) For test separation distances ≤ 50 mm, the power threshold determined by the equation in 4.3.1 c)
 - 1) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$
- b) The power threshold at 50mm/100 MHz in 4.3.1 b) is multiplied by $[1 + \log(100/f(\text{MHz}))]$ where f is 13.56MHz
- c) The power threshold in 4.3.1 b) is $[\text{Power allowed at numeric threshold for 50 mm in 4.3.1 a)} + [(\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)] \text{ mW}$, for 100 MHz to 1500 MHz where test separation distance is 50mm, frequency is 100MHz.
- d) Power allowed at numeric threshold for 50 mm in 4.3.1 a) is $[3/\sqrt{f(\text{GHz})}] \cdot (\text{test separation distance})$

Hence, SAR test exclusion threshold is calculated in reverse sequence:

$$\text{d) : } [3/\sqrt{0.1}] \cdot 50 = 474.3416\text{mW}$$

$$\text{c) : } 474.3416 + (50-50) \cdot (100/150) = 474.3416\text{mW}$$

$$\text{b) : } 474.3416 \cdot [1 + \log(100/13.56)] = 885.9469\text{mW}$$

$$\text{a) : } 885.9469 \cdot 0.5 = 442.973\text{mW}$$

Step c:

Frequency (MHz)	E-FIELD dBuV/m	Test Distance (m)	EIRP (dBm)	EIRP (mW)	Threshold (mW)
13.56	25.09	3	-70.06757	0.00000010	442.973

Note:

$$\text{EIRP (dBm)} = (\text{E-FIELD(dBuV/m)} + 20\log(d(\text{m})) - 104.7$$

$$\text{EIRP(mW)} = (10^{(\text{EIRP(dBm)}/10)})$$

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 90 days only.
除非另有說明，此報告結果僅對測試之樣品負責，同時此樣品僅保留90天。本報告未經本公司書面許可，不可部份複製。

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.tw/Terms-and-Conditions> and for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com.tw/Terms-and-Conditions>. 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.

SGS Taiwan Ltd.

No.134,Wu Kung Road, New Taipei Industrial Park, Wuku District, New Taipei City, Taiwan/新北市五股區新北產業園區五工路 134 號

台灣檢驗科技股份有限公司

t (886-2) 2299-3279

f (886-2) 2298-0488

www.sgs.com.tw

Member of SGS Group

2.3 Estimated SAR for simultaneous transmission

Based on KDB447498D01v06 4.3.2 b), when an antenna qualifies for the standalone SAR test exclusion of 4.3.1 and also transmits simultaneously with other antennas, the standalone SAR value must be estimated according to the following to determine the simultaneous transmission SAR test exclusion criteria:

1) $[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}/x] \text{ W/kg}$, for test separation distances $\leq 50 \text{ mm}$, where $x = 7.5$ for 1-g SAR and $x = 18.75$ for 10-g SAR.

Using the most conservative test separation distance 5mm, so the estimated 1g-SAR for NFC would be 0.00000000672 W/Kg.

Using the most conservative test separation distance 5mm, so the estimated 1g-SAR for BT would be 0.042 W/Kg.

Estimated SAR

Power (dBm)	dis. (mm)	freq. (MHz)	result
0	5	2480	0.042
-70.06757491	5	13.56	0.000

Collocated Calculation

Operation Mode	Result	Sum	Threshold
BLE	0.042	0.042	1.6
NFC	0.000		

~ End of Report ~

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 90 days only.
除非另有說明，此報告結果僅對測試之樣品負責，同時此樣品僅保留90天。本報告未經本公司書面許可，不可部份複製。

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.tw/Terms-and-Conditions> and for electronic format documents, subject to Terms and Conditions for Electronic Documents at <http://www.sgs.com.tw/Terms-and-Conditions>. 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.