According to KDB 447498 and KDB 616217

2) Transmitters and modules for use in portable exposure conditions that do not require SAR evaluation for simultaneous transmission

a) Unlicensed intentional radiators and licensed devices can be approved as either a transmitter or a module for use in stand-alone portable exposure conditions that do not allow simultaneous transmission. Based on the SAR or output power level, the following three conditions may be applied; otherwise, the provisions of item 2) c) should be considered. When SAR is evaluated using the procedures in item 2) b), additional stand-alone SAR evaluation is not required to incorporate the transmitter into final products based on procedures contained herein, or in KDB 616217 and its supplement or KDB 648474, when simultaneous transmission SAR evaluation is not required for the transmitter.

Table 2 – Summary of SAR Evaluation Requirements

<table>
<tr><th>Antenna Output Power (mW)</th><th>$\leq 60/f_{(GHz)}$</th><th>$> 60/f_{(GHz)}$</th></tr>
<tr><td>Individual Transmitter or Antenna</td><td>SAR not required</td><td>Antenna-to-user distance –
$\geq (5 + \frac{1}{2}\cdot n)$ cm: test SAR on highest output channel only
$< (5 + \frac{1}{2}\cdot n)$ cm: test SAR according to normal procedures</td></tr>
<tr><td rowspan="3">Simultaneous Transmitting Antennas</td><td>SAR not required: antenna-to-antenna or antenna-to-person distance ≥ 5 cm</td><td>SAR not required: antenna-to-antenna $\geq (5 + \frac{1}{2}\cdot n_x + \frac{1}{2}\cdot n_y)$ and antenna-to-person $\geq (5 + \frac{1}{2}\cdot n_x)$ cm</td></tr>
<tr><td colspan="2">SAR not required: when $\sum (SAR_{1g}) <$ SAR limit, antenna-to-antenna distances > 5 cm and antenna-to-user distance > 5 cm if output $> 60/f$</td></tr>
<tr><td colspan="2">otherwise, test antenna(s) using highest SAR configuration for the individual transmitter/antenna</td></tr>
</table>

The EUT is a stand-alone transmitter, its maximum output power = 13.75 dBm = 23.71 mW, 60/f (GHz) = 24.5 mW, the maximum output power of EUT < 60/f (GHz).

So the SAR evaluation is exempt.