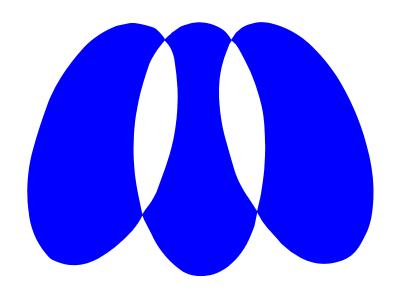
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Nippon Mektron, Ltd. Green Procurement Guideline Ver.3



Nov. 13, 2017 Nippon Mektron, Ltd.

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1. Introduction

With diversification of global environmental issues year by year, the global warming by energy consumption, waste issues rooted in mass production, mass consumption and mass disposal, and environmental load substances such as VOC (volatile organic compound) are all directly or indirectly related to business activities.

We produce mainly electric and electronic parts using plastic films and metal materials and has been promoting reduction of environmental load substances, saving of resources and energy, reduction of waste and development of environmental low load products. We recognize that we fulfill social responsibility by contribution to the creation of a recycling society through these activities.

On the other hand, global electrical and electronic customers request us management of environmental load substances such as revised RoHS Directive(Directive2011/65/EU; Hereinafter referred to as RoHS2),

European REACH regulation, Halogen regulation, etc. and global automotive customers request us the same management related to ELV Directive, too. Since we develop, produce and sell our products as quality first, we recognize such management of environmental load substances as important quality issue and have been making our efforts for reinforcement of production and management, reduction of lead compounds use and compliance to halogen regulation, etc.

Since our products consist of raw materials, parts and secondary materials supplied from vendors, we recognize it important for vendors to cooperate with management of environmental load substances.

At the point of the significant environmental aspects that vendors have been making their efforts for the solution in the 21st century, all business activities and stakeholders have to make their efforts for the solution of environmental issues such as climate change, energy issues, environmental load substances, global environmental issues and biodiversity conservation. Therefore we request vendors to promote their efforts for the solution of significant environmental aspects related to business activities.

As part of management of environmental load substances under a background above, we hereby revised "Green Procurement Guideline as Ver.3" and request vendors to understand our policy and make their daily efforts based on this guideline.

鹏力清也

Seiya Kamoi,

General Manager of Procurement Division (Executive Director)

Nippon Mektron,Ltd.

2. Mektec group's Basic Philosophy, Management Principle, Management Policy, Nippon Mektron and Mektec group's Environmental Basic Policy

Basic Philosophy

As a member of NOK Group, Mektec Group make efforts to be a contributive company in society by pursuing our profits through fair competition, sharing prides with all stakeholders and promoting management for our dreams under management principle based on NOK spirit. For this purpose, we globally respect human rights and obey the related laws and regulations, international rules and their spirit and act autonomously with a social conscience, regardless of domestically or abroad.

Management Principle

- 1. Management that respects human beings based on regard and trust
- 2. Management that is open with true solidarity and no factions
- 3. Management that makes efforts over common sense and is strong under adversity
- 4. Management plans that constantly pursue dreams

Management Policy

- 1. To be an even stronger and more original electronic and electric parts company by concentrating management resources on the priority fields.
- 2. To have a higher profit company structure by thorough cost down from management's up-stream to down-stream of production process.
- To produce and supply worldwide useful and original products based on high engineering by constant efforts for quality improvement

Our aim: To be a company which all stakeholders take prides in.



Nippon Mektron and Mektec group's Environmental Basic Policy

Basic Philosophy

Mektec Group. promote positive activities for global environmental conservation and contribute to construction of our sustainable society with total cooperation, placing our efforts for environmental conservation as one of the most important issues of management.

Action guideline

All managers and employees share the action guideline below with them.

- 1. Effective use of resources and reduction of emission of both industrial waste and carbon dioxide We use resources such as raw materials and water and have industrial wastes and drain polluting environment during production process. We promote resources saving and wastes reduction and produce products with energy saving for reduction of carbon dioxide.
- 2. No use of hazardous substances
 - We don't use the materials containing hazardous substances that cause environmental destruction and human health damage as much as possible for resources needed in business activities. In case of our unintentional use of the materials containing hazardous substances, we use ones that have environmental low load for global environment, local residents and our employees.
- 3. Improvement of environmental quality of products Our products are used for various purposes, finish their functions and are abolished finally. We positively use raw materials and secondary materials that have environmental low load after they are incinerated or buried in the ground and make our continuous efforts for maintenance and improvement of environmental quality of products.
- 4. Protection of biodiversity
 - When we use resources that make effects on biodiversity, we make our efforts for the method of maintenance for biodiversity conservation and consider the environmental effects on natural environmental conservation in business activities.
- 5. Compliance of laws and regulations
 - We comply with environmental laws and regulations, local government regulations and local Agreement, etc. and promote our environmental conservation activities.
- 6. Listening to stakeholder's requests with an open mind.
 - We listen to environmental requests from stakeholders and make our positive efforts for the solutions
- 7. Disclosure of information
 - We communicate with society widely and have our positive disclose of information.

Action guideline above are quantitatively evaluated by the indexes below.

- (1) Total amount of procured materials and amount of procured materials containing environmental load substances
- (2) Amount of use of materials effecting on biodiversity and amount of emissions of environmental load substances
- (3) Total amount of emissions of wastes per year
- (4) Amount of consumption of electric power and various fuels per year
- (5) Amount of emissions of carbon dioxide per a product
- (6) Amount of water supply and drain
- (7) Amount of emissions of PRTR
- (8) Number of products containing environment load substances

3. Nippon Mektron, Ltd.'s Stance on Green Procurement

(1) Purpose

We systematically implement our environmental conservation activities and make our efforts for continuous improvement. As one of our efforts, we promote procurement of products, parts, primary materials, secondary materials, jigs and tools, etc. with environmental low load (Hereinafter referred to as "Green Procurement").

- a. Priority procurement from vendors who promote their environmental conservation activities.
- b. Green procurement in life cycle of each process of procurement of materials, production, distribution, consumption and abolishment, etc. based on our designated "Green procurement guideline".

(2) Mektec group's Efforts

a. Priority procurement from vendors who promote their environmental conservation activities Vendors basically promote their spontaneous activities for environmental conservation and we support their improvement activities, if necessary.

As green procurement, we promote our priority procurement from vendors who make their efforts for activities considering environment such as ISO 14001 external certification.

Concretely, we evaluate and judge vendors' efforts for ISO 14001 external certification, green procurement and environmental conservation activities.

b. Green procurement

We classify procured materials into three items below and manage their use.

- (a) Product components such as primary materials, parts, etc., packaging materials and labels attached to products delivered to customers. The primary materials, parts, etc. above include customers' supplies and designated materials
- (b) Secondary materials, jigs and tools touching products directly or indirectly through workers, production facilities having the parts that possibly make environmental effects on products
- (c) Stationery and office supplies used in production process Writing materials, stationery, files, notebooks, etc.

(3) Scope of Guideline Application

This Guideline applies to all materials that make possibly effects of environmental load substances on products in all procured items that are components of our products and used in production activities which make possibly effects of environmental load on products.

(4) Standard of Evaluation and Judgment

a. Evaluation and Selection of Vendors

As selection of vendors, we evaluate the environment that is vendors' efforts for environmental conservation activities in addition to quality, cost, delivery and service. We evaluate vendors by the items below with priority to the acquisition of ISO 14001 external certification, classify them into four ranks(A-D) by total evaluation points based on "Vendor's Environmental Assurance System Survey Form" (TC12-A01/01) and give priority to the vendors with high rank of evaluation.

(a) Evaluation items

- Vendors who acquired ISO 14001 external certification or have plans to do it.
- Vendors who implement green procurement or have plans to do it
- Vendors who make their positive efforts for the 11 items below to environmental conservation
 - Items of to environmental policy, environmental object, environmental system and environmental aspects
 - · Items of laws and regulations, and Mektec group's customers
 - · Items of education and training
 - · Items of information
 - · Items of document management
 - Items of process management(receiving inspection, production process, shipping inspection, storage)
 - · Items of vendor management
 - Items of trouble shooting and emergency action
 - · Items of change management
 - · Items of corrective and preventive measures
 - · Items of internal audit

Note: we request separate surveys for vendors by additional items, if necessary.

(b) Selection Standard

We have first priority to vendors of rank A but have no procurement from them of rank C whose corrective measures we can't approve and them of rank D as table below.

Rank	Evaluation score(point)	Evaluation		
Α	90-100	OK. Keep present level		
В	80-89	OK. Need to make continuous efforts for level-up		
С	60-79	Draft an improvement plan and submit the corrective measures to us. If it is not approved, NG is judged.		
D	< 60	We have no procurement because of NG judged.		

Table1. Evaluation for rank

b. Adoption Standard of Procured Items

Procured items should satisfy the items below for adoption for the purpose of compliance of laws and regulations, reduction of environmental load and recycling, etc.

(a) Environmental Assurance System Form for Vendors(TC12-A02/01)

We request vendors submission of this form by filling out "No. of points" and "comments on specifics to confirm" in self-diagnosis items(No.1-150), as our selection of vendors,.

(b) Cooperative Agreement on Green Procurement of NIPPON MEKTRON, LTD.(TC12-A02/02) We request vendors submission of this form related to "Green Procurement Guideline Ver.3" by filling out "Date", "Company name", "Representative name", "Contact" and "Company's seal".

(c) Non-use Warranty(TC12-A02/03)

We request vendors submission of this form by filling out the items below and company seal.

-We request vendors to fill out "Vendor's code number", "Mektec group code number", "Target analysis substances", "Analysis finished date" for Specific banned substances.

"Specific banned substances" are RoHS2 regulated 10 substances below.

Cadmium and its compound, Lead and its compound, Mercury and its compound, Hexavalent chromium and its compound, PBB(Polybrominated biphenyl), PBDE(Polybrominated diphenyl)

- ester), DEHP(Phthalate acid bis2-ethylhexyl), DBP(Phthalate acid dibutyl), BBP(Phthalate acid butyl benzyl) and DINP(Phthalate acid diisononyl).
- -We request vendors to fill out "Published date of Target Regulated Substance List", "Vendor's code number", "Component name", "No", "Target regulated substance name", "Content rate" and "Purpose of contain/Substitute plan" for target regulated substances, referred to "Target Regulated Substances List" (TC12-A02/06).
- -We request vendors to fill out "Vendor's code number", "Mektec group code number", "Component name", "Internal contain/no-contain", "Unintentional contain/no-contain", "Content rate", "Purpose of contain" for halogen regulated substances(Chlorine, Bromine), Antimony and its compounds.
- -We request vendors to mark use or no-use for red phosphorus.
- (d) Survey Sheet of Chemical Substances in Product (TC12-A02/05)
 We request vendors submission of this form by filling out "Component name", "CAS No.", "Content rate" and "Purpose of contain".
- (e) Survey Sheet of Cleanliness Substances (TC12-A02/06)
 - We request vendors submission of this form attached with analysis report by filling out "Analysis data" of target cleanliness substances(organic silicone, anion and cation), "Detection limit" of analysis device and "Analysis method (in case of different from our designated one)" for our designated materials (primary materials used for HDD items and secondary materials used in related production process, etc.).
- (f) Analysis Report (based on analysis standard of third party analysis laboratories)
 - We request vendors submission of this form for RoHS2 regulated 10 substances and other substances by customer's request, if necessary.
 - Analysis report is applicable to one published only by third party laboratories that acquired ISO 14001 external certification.
- (g) SDS(Safety Data Sheet)
 - -We request vendors submission of SDS based on JIS Z 7253:2012 since we make use of SDS for management of industrial safety and health, waste water treatment, and waste, etc.
 - -We request vendors to indicate "PRTR law" in item15 (Regulatory information) in SDS if product is applicable to target substances(Class I designated chemical substances) of the law.
 - PRTR law (Pollutant Release and Transfer Register law) is Japanese law and the latest target substances are referred to address below.
 - (http://www.meti.go.jp/policy/chemical_management/law/prtr/pdf/engsindai.pdf)
 - -We request vendors submission of SDS by customer's request if necessary for other procured items except for primary materials and secondary materials.

4. Handling of Guideline

Handling of guideline to vendors is below.

- (1) We submit this guideline to new vendors every time the trade starts.
- (2) We submit the updated guideline every time it is revised.
- (3) We publish the updated guideline on our home page every time it is revised.

5. Handling of Personal Information

Vendor' personal information is used only for the purpose of NIPPON MEKTRON's check of contents related to green procurement survey. Mektec group companies and their outsourcing companies use it only for the purpose above, if necessary.

6. Request for Vendors

We request vendors their systematic promotion and continuous improvement for environmental conservation activities and survey replies for items below related to their improvement activities and procured items.

We have regular and irregular survey request for vendors.

(1) Reports to be Submitted

Reports to be submitted and period of submission is below. We request vendors submission of reports by electronic files or printed papers according to the type of reports.

a. Environmental Assurance System Form for Vendors (TC12-A02/01)

As selection of vendors, after we audit them based on the self-diagnosis points in self-diagnosis items(No.1-150), we request them to fill out diagnosis points after our audit and to submit us this form.

b. Green Procurement Cooperation Agreement (TC12-A02/02)

We request all vendors submission of this form with the revision of "Green Procurement Guideline" this time and every time we revise this guideline from now on. .

c. Non-use Warranty (TC12-A02/03)

We request vendors submission of this form at new procurement and every year after issue for primary materials as components of products and packaging materials. We request vendors submission of this form at new procurement and unspecified date if necessary for secondary materials as no components of products.

d. Analysis Report (base on analysis standard of third party laboratories)

Analysis report is applicable to one published only by third party laboratories that acquired ISO 14001 external certification.

We request vendors submission of this form at new procurement and every year after analysis finished date for primary materials as components of products and packaging materials. We request vendors submission of this form at new procurement and unspecified date if necessary for secondary materials as no components of products.

e. Survey Sheet of Chemicals in Products (TC12-A02/05)

We request vendors submission of this form at new procurement only.

f. Survey Sheet of Cleanliness Substances (TC12-A02/06)

We request vendors submission of this form at new procurement and unspecified date if necessary for our designated materials (primary materials used for HDD items and secondary materials used in related production process, etc.).

g. Safety Data Sheet (SDS)

We request vendors submission of this form at new procurement, every time it is revised by revision of laws and regulations, etc. and unspecified date such as customer's request. In principle, we request vendors publication of SDS in main language of their own countries or in our designated language by type of procured items and customer's request.

- h. We request vendors submission of MSDSplus or AIS regulated by JAMP, IMDS(International Material Data System) and other survey forms such as domestic 62474(former name : JGPSSI), if necessary. MSDSplus or AIS are applicable till the end of July, 2018 and ChemSHERPA is applicable from that time with the shift of MSDS plus and AIS to ChemSHERPA. We request vendors submission by ChemSHERPA till that time by customer's request, if necessary.
- i. We request vendors submission of other reports except for above by customer's request, if necessary.

Table2. List of Reports to be Submitted

			Environmenta System Form (Cooperative, Green Procur		Analysis Rep (based on an of third party	Survey Sheet of Chemical Substances in Product (TC12-A02/05)	Survey Sheet of Cleanliness Substances (TC12-A02/06)	SDS(Safety Data Sheet)	- MSDS or AIS(applicable till July,2018) - ChemSHERPA(applicable since Aug,2018)
-	periodical survey (once a year)			0	0	0	0	(O)	0	(0)
New procured items	Procured histo	ry (within a past year)	_	_	0	0	0	(O)	0	(O)
	Facilities and machinery	New establishment, extension, renovation modification	_	_	0	_	_	_	_	_
	шасппету	Relocation	_	_	_	_	_	_	_	
	Molds, jigs	New procurement, extension, renovation, modification	_	_	0	_	_	_	_	_
	and tools	Relocation	_	_	0	_	_	_	_	_
	Process	Change of condition and method	_	_	0	0	_	_	_	_
	condition and method	Addition and deletion of process, change of process sequence	_	_	0	0	_	_	_	_
ass production items		Shift and extension of production(factory A → factory B in vendor)	_	_	0	0	_	_	_	_
product	Process	Shift and extension of production(Dept. A → Dept. B in vendor)	_	_	0	0	_	_	_	_
Mass	division	Shift of production(from internal/outsourcing to outsourcing/internal in vendor)	_	0	0	0			_	_
		Change of vendor's outsourcing(Company A → Company B)	_	0	0	0	_	_	_	_
	Inspection condition and method	Change of inspection method and standard	_	_	_	_	_	_	_	_
	Material	Change of supplier, grade and specification	_	_	0	0	0	(0)	0	(0)
	Product and parts	Change of specification	_	_	0	0	0	(0)	0	(0)
		Change of packaging form, material and grade	_	_	0	0	_	_	0	(0)
Others Changes of others except for above					heck the ntact dep					

Notes1 : O : Reports to be submitted, (O) : Reports to be submitted only when we request vendors if necessary

- : Not required

Notes2: Reports to be submitted differ by the type of procured items.

(2) How to Fill Out Forms

a. Environmental Assurance System Form for Vendors (TC12-A02/01)

We request vendors indication of the necessary items, self-mark and their comments for each item

based on mark standard.

b. Green Procurement Cooperation Agreement (TC12-A02/02)

We request vendors indication of date, company name, representative's name and company seal of both agency and vendor and department name, person in charge, phone and E-mail as contact.

c. Non-Use Warranty (TC12-A02/03)

We request vendors indication of date, company name, responsible person and company seal.

We request vendors indication of analysis finished date of RoHS2 regulated 10 substances for "1.Specific banned substances" and submission of analysis report for halogen regulated substances, etc. except for RoHS2 regulated 10 substances, if necessary.

d. Analysis report (based on analysis standard of third party analysis laboratories)

(a) Target analysis materials

We request vendors analysis of every homogeneous material of procured items by the calculation that content rate (ppm) is contain amount \times 1000000 \div homogeneous material amount. Homogeneous material that is component of product and is not decomposed physically and chemically.

(b) Analysis method

We show detection limit, pretreatment and analysis method of RoHS2 regulated 10 substances designated as "Specific banned substances" and halogen regulated substances(Chlorine, Bromine) that we request vendors analysis if necessary in Table 1 below. We request vendors to inform us of the reason before submission of report in case the analysis device doesn't satisfy detection limit.

Fluorescenct X ray analysis is not applicable because of low precision. We request vendors submission of analysis report of other substances except for above when customers request us that.

Table 3. Detection limit and analysis method of regulated substances

Regulated substances	Target analysis substances	Detection Limit <notes2></notes2>	Pretreatment and analysis method			
RoHS2 regulated 10 substances	Cd(Cadmium and its compound)	< 2ppm				
	Pb(Lead and its compound)	< 2ppm				
	Hg(Mercury and its compound)	< 2ppm				
	Cr(VI)(Hexavalent chromium and its compound)	< 8ppm				
	PBB(Polybrominated biphenyl) <notes1></notes1>	< 5ppm	We request vendors to fill out pretreatment and analysis method based on IEC62321			
	PBDE(Polybrominated diphenyl ester <notes1></notes1>	< 5ppm	in analysis report			
	DEHP(Phthalate acid bis 2-ethylhexyl)	< 50ppm				
	DBP(Phthalate acid dibutyl)	< 50ppm				
	BBP(Phthalate acid butyl benzyl)	< 50ppm				
	DINP(Phthalate acid diisononyl)	< 50ppm				
	CI(Chlorine)	< 50ppm		Ion chromatography or		
Halogen	Br(Bromine)	<50ppm	EN14582:2007	other analysis with detection limit less than 50		
Antimony and Its compound	Sb(Antimony)	< 2ppm	We request vendors to fill out pretreatment and analysis method based on IEC6232 in analysis report			

Notes1: Analysis of PBB and PBDE are not required for metals, glass and ceramics as homogeneous materials.

Notes2: If detection limit of analysis device is more than the figure of each target analysis substance, we request vendors consult with us before analysis.

(c) Items to be indicated

We request vendors indication of 7 items below in analysis report in English only or in both Japanese and English. If vendors don't indicate all items in analysis report, we request them re-submission of analysis report. The period of validity is one year after analysis finished date for primary materials and parts of product components and packaging materials.

- Analysis finished date
- Analyst, A responsible person, third party laboratory
- Pretreatment(flow), Indication of complete dissolution in flow
- Analysis method
- Detection limit
- Analysis result
- Color photo of sample (appearance and characters of sample required to be clear)

(d) Analysis laboratory

Analysis report is applicable to one published only by third party laboratories that acquired ISO 14001 external certification.

- e. Survey Sheet of Chemical Substances in Product (TC12-A02/05)
 - -We request vendors indication of "Component name", "CAS No.", "Content rate(with significant figure two digits by total 100%)" and "Purpose of contain".
 - -We request vendors disclosure of CAS No. in principle.
 - -We request vendors disclosure of CAS No. by our global customer's request if necessary even if vendors don't disclose it.
- f. Survey Sheet of Cleanliness Substances (TC12-A02/06)

We request vendors indication of mass deposit of cleanliness substances (organic silicone, anion and cation) on the surface of product based on analysis method for our designated materials (primary materials used for HDD items and secondary materials used in related production process, etc.).

g. MSDS plus and AIS of JAMP

Information of SVHC(substance of very high concern) contained in articles as products and parts that are exported to European market is obliged to be submitted by European REACH regulations enforced on June. 1, 2007. REACH regulation made public the first target substances as ones which information is obliged to be disclosed on Oct. 28, 2008 and has been adding new target substances by turns. We will get contain/no-contain information of chemical substances including JAMP 's target management substances that cover the additional target substances of REACH regulations in future not to avoid repeated gathering of information. And we request vendors survey reply for IMDS, domestic VT62474 (former name: JGPSSI) by their designated format.

PS1003-C

(3) Method of reply

We request vendors to submit printed paper to us for "Cooperative Agreement on Green Procurement", our designated electronic format to us for "Environmental Assurance System Form for Vendors", "Survey Sheet of Chemical Substances in Product" and "Non-use Warranty", XML files to us for "MSDS plus or AIS" and PDF files to us for "SDS" and "Analysis report". We request vendors to submit replies by other tools except for electronic files, if necessary.

(4) Handling

We might use analysis reports and SDS as non-use evidence related to environmental load substances such as RoHS2 regulated 10 substances to our customers and don't disclose other information at all.

7. Contact

If you have any inquiries on "Green Procurement Guideline Ver.3", please contact below.

Nippon Mektron, Itd.

- Procurement Planning Center, Procurement div.

TEL: 029-896-8631, FAX: 029-830-9286

- Environment and Safety dept., Corporate Administration div.

TEL: 029-830-9268, FAX: 029-830-9158

Revised: Nov. 13, 2017

Procurement Planning Center, Procurement div.

8. Revision history

1. Publication history: Aug.21, 2007

Management standard is established for publication of "Green Procurement Guideline"

2. Revision of history

Revision No.	1					
Revision date	Apr. 18, 2	Apr. 18, 2008				
Revision reason	Revision	Revision of Annex				
Revision page	Item Contents of revision					
3	Annex 2	2 Revision of "Survey Sheet of Cleanliness Substances(TC12-A02/06)"				

Revision No.	2						
Revision date	Mar. 23, 2012						
Revision reason	By revision of "Standard of Chemical substances management"						
	2. By customer's request						
Revision page	Item Contents of revision						
3	Annex1	Revision of "Green Procurement Guideline" -Change of Ver.1 to Ver.2 -Change of Environmental policy to environmental basic policy -Addition of reports to be submitted from vendors and explanation -Change of name of "Survey Sheet of Chemical Substances in Product", "Survey Sheet of Cleanliness Substances" and "Target Regulated Substances List"					
	Annex2	Change of format of "No-use of Warranty", "Analysis Data List", "Survey Sheet of Chemical Substances in Product", "Survey Sheet of Cleanliness Substances" and "Target Regulated Substances List"					

Revision No.	3					
Revision date	**. **, 2017					
Revision reason	1.By revision of "Standard of Chemical substances management" 2.By revision of "Environmental policy" 3.By trend of environmental laws and regulations, customer's request, etc.					
Revision page	Item					
_	Cover	Change of Ver.2 to Ver.3 and published date				
_	Contents	Change of words, items, item's number, page,etc.)				
1	Introduction	Change of RoHS to RoHS2, Halogen free to halogen regulation, general manager's name of procurement division				
2	Basic philosophy	Change of "Nippon Mektron,Ltd." to "Mektec group"				
3	Basic philosophy Action guideline	Change of "Nippon Mektron,Ltd." to "Mektec group" Change of "Nippon Mektron,Ltd." to "Mektec group", addition of guideline(Protection of biodiversity), change of reference (Amount of use of materials effecting on biodiversity and amount of emissions of environmental load substances)				
4-6	Nippon Mektron,Ltd.'s Stance on Green Procurement					
	Handling of Guideline	Change of words				
7	Handling of Personal Information	Change of "Group companies" to "Mektec group companies"				
	Request for Vendors	Change of words				
7-9	(1) Reports to be Submitted•	Change of text and words in table				
9-11	(2) How to Fill Out Forms	Change of the text, Change of RoHS to RoHS2				
	(3) Method of reply	Change of the text				
12	(4) Handling	Change of MSDS to SDS, Change of RoHS to RoHS2				
	Contact	Change of words				