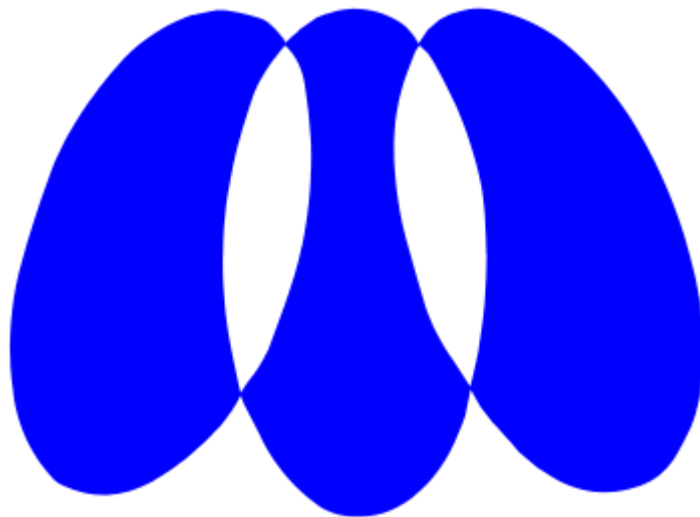


Ver.1 Aug. 20, 2007
Ver.2 Mar. 23, 2012
Ver.3 Nov. 13, 2017
Ver.3.1 Aug. 1, 2021

NIPPON MEKTRON, LTD. Green Procurement Guidelines **Ver. 3.1**



Aug. 1, 2021
NIPPON MEKTRON, LTD.

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Form relation

- Customer Product Environmental Guarantee System Survey Form (TC12-A02 / 01)
- Non-use warranty (TC12-A02 / 03)
- Product-containing substance survey form (TC12-A02 / 05)
- Cleanliness substance questionnaire (TC12-A02 / 06)
- List of regulated substances (TC46-A01 / 03)

1. Introduction

Global environmental problems are diversifying year by year, and global warming problems due to energy consumption, mass production, waste problems brought about by mass consumption / mass disposal type society, and environmental load such as VOC (volatile organic compounds) Material problems are directly or indirectly related to corporate activities. Our company mainly produces electrical and electronic parts using plastic films and metal materials, but we reduce environmentally hazardous substances used in products and manufacturing processes, save resources, save energy and waste. We are promoting the development of products with less environmental impact. Contributing to the construction of a sound material-cycle society through these activities is a corporate social responsibility, and we would like to carry it out steadily.

On the other hand, we are strongly strengthening the management of environmentally hazardous substances from global customers related to electronics and electrical machinery, such as compliance with the revised RoHS Directive (Directive 2011 / 65 / EU; hereinafter referred to as the RoHS2 Directive), compliance with European REACH regulations, and compliance with halogen regulations. It is also required, and global automobile-related customers are strongly demanding similar management in relation to the ELV Directive. We develop, produce and sell with quality first, but we also position such environmentally hazardous substance management as an important quality problem, thoroughly implement production and control system, reduce the amount of lead compounds used, and regulate halogen. We are working to promote the response.

However, since our products cannot be realized without the raw materials, parts, auxiliary materials, etc. delivered by our business partners, we believe that it is important for our business partners to cooperate with us regarding the management of environmentally hazardous substances. increase.

In addition, regarding the remarkable environmental aspects that our business partners have been tackling in the 21st century, we have addressed environmental issues such as climate change, energy issues, environmentally hazardous substances issues, global environmental issues, and biodiversity conservation. Therefore, it is a problem that cannot be solved unless all business activities and people cooperate to deal with it.

Therefore, we request that you also promote significant environmental initiatives related to the business activities of our business partners.

Based on the above, we have issued a revised version of "NIPPON MEKTRON, LTD. Green Procurement Guideline Ver.3.1" as part of the management of environmentally hazardous substances. We ask that you understand the purpose of our company and make daily efforts based on these guidelines.

Atsushi Nomoto
Managing Director
Corporate Procurement Management office
NIPPON MEKTRON, LTD.

2. MEKTEC Group's Basic Philosophy, Management Principle, Management Policy, Basic Environmental Policy

Basic Philosophy

As a member of the NOK Group, the MEKTEC Group is proud of all stakeholders, so-called stakeholders, rather than simply pursuing profits through fair competition under the management philosophy based on the NOK spirit. We will promote management that allows us to have it and continue to pursue our dreams with the following management policy, and aim to be a widely useful existence for society. To achieve this, we will respect human rights both inside and outside the country, comply with relevant laws and regulations, international rules and their spirits, and act voluntarily with social decency.

Management Principle

1. The Management has to run the Company based on feelings of love and trust in its employees.
2. The Management has to run the Company while uniting to ensure full ventilation without forming any cliques.
3. The Management has to run the Company while making absolutely incredible efforts against all odds and risks.
4. The Management has to run the Company while pursuing dreams with management plan.

Management Policy

1. We are committed to be a strong and unique parts supplier while focusing its managerial resources on core business areas.
2. We are committed to be a profitable and robust company while fulfilling company-wide cost reduction programs ranging from front-line sales to manufacturing floor.
3. We are committed to continuously improving our quality while producing and selling our products that are proven to be technologically unique and socially useful on a global scale.

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



The MEKTEC Group is a general term for NIPPON MEKTRON, LTD. and its overseas group companies.

MEKTEC Group's Basic Environmental Policy

[Basic policy]

We, the MEKTEC Group, have made environmental conservation efforts one of the most important management issues, and with the collective strength of the group, we will actively work on global environmental conservation and contribute to the construction of a society capable of sustainable development. increase.

[Code of Conduct] All management and employees share the following code of conduct.

1: Effective use of resources, reduction of waste and carbon dioxide emissions

When manufacturing products, resources such as raw materials and water are used, and waste and wastewater that pollute the environment are generated. We, the MEKTEC Group, are committed to lean resource use 1) 5) and waste reduction 3), and can produce products with less energy consumption to reduce carbon dioxide emissions 4). I will work on it. 5)

2: Do not use harmful substances

As for the resources necessary for business activities, we do not use as much as possible 6) 7) that contain harmful substances that may adversely affect the environment or health. If it is unavoidable, use one that has little impact on the global environment, local residents and people working at the company.

3: Improving product environmental quality

Our products are used for a variety of purposes, but in the end the day will come when they will end their role and be discarded. At this time, we will actively adopt raw materials and auxiliary materials that do not have an impact on the environment even if they are incinerated or landfilled. We will also continue to work to maintain and improve product environmental quality. 8)

4. Protecting biodiversity

When using resources that affect biodiversity in our business activities, we strive to adopt methods that maintain biodiversity conservation. In our business activities, we will consider the impact on the conservation of the natural environment in the region. 2)

5: Observe laws and regulations

We will promote environmental conservation activities by observing environmental laws and regulations, local government ordinances, regional agreements, etc.

6: Listen

We listen to the environmental demands of all people (stakeholders) involved in our corporate activities and actively work on them.

7: Disclosure of information

We will communicate widely with society and actively disclose necessary environmental information.

<< Reference >> The above notes are evaluated quantitatively by the following indicators.

- 1) Total purchase of materials, purchase of materials containing environmentally hazardous substances
- 2) Biodiversity Impact Resource Usage and Environmental Impact Substance Emissions
- 3) Total annual waste emissions
- 4) Annual consumption of electricity and various fuels
- 5) Carbon dioxide emissions per product
- 6) Water supply and drainage
- 7) PRTR emissions
- 8) Number of products containing environmentally hazardous substances

3. NIPPON MEKTRON, LTD.'s concept of green procurement

(1) Purpose

We systematically carry out environmental conservation activities and work on continuous improvement. As part of this, we will promote the procurement of products, raw materials, parts, auxiliary materials, jigs and tools, etc. that have a low environmental impact (hereinafter referred to as green procurement).

- a. Procurement from business partners who are promoting environmental conservation activities.
- b. Procurement of products, raw materials, parts, auxiliary materials, jigs and tools, etc. that have a low environmental impact in the life cycle (procurement of materials, manufacturing, distribution, consumption, disposal, etc.) in accordance with the "Green Procurement Guidelines" specified by the Company. To do.

(2) Efforts of NIPPON MEKTRON, LTD.

- a. Procurement from business partners promoting environmental conservation activities

Our activities for environmental conservation are basically voluntary activities of our business partners, but we will support the improvement activities of our business partners as necessary.

In green procurement, we will promote procurement from business partners who are engaged in environmentally friendly activities such as the acquisition of ISO14001 external certification.

Specifically, we will evaluate and judge our business partners' efforts to acquire ISO14001 external certification, green procurement, and environmental conservation activities.

- b. Procurement of products, raw materials, parts, auxiliary materials, jigs and tools with low environmental impact

We classify procured items into the following two types, and manage and operate them.

- (a) Parts (raw materials, parts, etc.) that make up the product, packaging materials, labels, and other auxiliary materials that are delivered to the customer along with the product.
- (b) Secondary materials, jigs and tools, production equipment, office supplies that come into direct or indirect contact with the product, which are necessary for manufacturing the product.

(3) Scope of application of this guideline

This guideline applies to all the procured products that make up all the products we produce and the procured products used in our production activities that may affect the products with environmentally hazardous substances.

(4) Evaluation criteria and materials to be submitted

- a. Evaluation criteria of business partners

In selecting our business partners, in addition to quality, price, delivery, and service, we also manage the chemicals in products (CiP) of our business partners. We will evaluate the status of our efforts in the "Business Partner Product Environmental Guarantee System Survey Form". When selecting a business partner at our company, we ask that the business partner perform a self-diagnosis using the "Business Partner Product Environmental Guarantee System Survey Form" based on the request from the Company and report it.

- (a) Evaluation items

A product-containing chemical substance management system has been constructed based on the contents of the JAMP check sheet. Specifically, the following items will be evaluated.

- 5.1.3 Determining the scope of application of control of chemical substances contained in products
- 5.2.2 Policy
- 5.2.3 Organizational Roles, Responsibilities and Authority

- 5.3.2 Goals and planning to achieve them
- 5.4.2 Competence
- 5.4.5 Documented information
- 5.5.2.1 Communication with customers
- 5.5.2.2 Clarification of control standards for chemical substances contained in products
- 5.5.3 Management of chemical substances contained in products in design and development
- 5.5.4.1 Obtaining and confirming information on chemical substances contained in products
- 5.5.4.2 Confirmation of management status of chemical substances contained in products by suppliers
- 5.5.4.3 Management of chemical substances contained in products at the time of acceptance
- 5.5.4.4 Confirmation of management status of chemical substances contained in products at outsourced companies
- 5.5.5.1 Management in manufacturing process (management of conversion process)
- 5.5.5.2 Prevention of misuse and pollution (control of misuse and pollution of parallel production and prohibited substances)

(b) Evaluation criteria

Based on the self-evaluation result of the "Business Partner Product Environmental Guarantee System Survey Form" submitted by the business partner, we will confirm the description and describe the evaluation result of our company.

If necessary, we will request an explanation of the mound for the self-evaluation result and confirm it by an on-site audit at our company, and we will describe the evaluation result as our company.

If there are any deficiencies due to this, we may ask you to correct them.

As shown in the table below, the evaluation ranks are ranked. If the serious nonconformity cannot be improved, the evaluation rank D: rejected (transaction not possible). Table 1. Evaluation for evaluation rank

Evaluation Rank	Evaluation contents	Evaluation results
A	No nonconformity / Partial conformity	Pass. It is at a good level, so please maintain the current level.
B	No nonconformity	Pass. Although it is generally a good level, please continue to improve it so that it will be fully compatible.
C	There was a nonconformity, Improved	Pass. Please follow up on the non-conforming items and continue to improve the level so that they are all non-conforming.
D	There is a nonconformity, Not improved	Fail. We can't trade.

(c) Reassessment

We will re-evaluate our business partners who have a high risk of product environmental quality according to the above evaluation, so we ask for your cooperation.

b. Recruitment criteria for procured items

Regarding procured products, it is a condition of adoption that the following items are satisfied for the purpose of legal compliance, reduction of environmental load, and compliance with customer requirements based on the basic environmental policy.

- (a) Submission of "Business Partner Product Environmental Guarantee System Survey Form" (TC12-A02 / 01)

Please submit when you start a new transaction and when you re-evaluate.

We will carry out re-evaluation for business partners who have a high risk of product environmental quality.

(b) Submission of "Non-use Guarantee" (TC12-A02 / 03)

At the time of purchasing new procured products, and the raw materials and packaging materials that make up our products with continuously purchased materials, please submit them every year at the request of our company.

(c) Submission of analysis report

At the time of purchasing new procured products, and the raw materials and packaging materials that make up our products with continuously purchased materials, please submit them every year at the request of our company.

The chemical substances to be analyzed are 10 RoHS2 directive substances (cadmium (Cd), lead (Pb), hexavalent chromium (Cr (VI)), mercury (Hg), polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE).) - Phthalate (DEHP, BBP, DBP, DIBP)). In addition, we may ask you to submit an analysis report on halogen-regulated substances, etc. as necessary.

(d) Submission of "Product-containing substance survey form" (TC12-A02 / 05)

At the time of purchasing a new procured item, please submit it at the request of our company.

(e) Submission of SDS

Please submit at the request of our company at the time of purchasing a new procured item and at the time when it is necessary.

If the SDS is revised by the manufacturer for continuous delivery, please submit it to us immediately.

(f) Submission of "Cleanliness Substance Survey Form" (TC12-A02 / 06)

When purchasing a new procured item, please submit it at the request of our company as necessary.

(g) Submission of other survey documents such as chemSHERPA

We will make a request from our company as necessary according to the request from customers.

Table 2. List of submitted reports

Customer evaluation	Customer Product Environmental Guarantee System Survey Form (TC12-A02 / 01-1)
At the start of a new transaction	○
reassessment	(○)

Procurement product evaluation	Non-use warranty (TC12-A02 / 03)	Analysis report (based on the analysis standards of third-party analysis organizations)	Product-containing substance survey Form (TC12-A02 / 05)	Cleanliness Substance Survey Form (TC12-A02 / 06)	Safety Data Sheet (SDS)	ChemSHERPA
New deliveries						
Process change	Facilities and Machinery	New establishment, extension, renovation, modification, relocation	Required documents will change depending on the process changes. After submitting the process change application, we will request the submission of necessary documents.			
	Jigs and tools	New procurement, extension, renovation, modification, relocation				
	Processing conditions -Method	Change of condition/Method, Addition/deletion of process, change of process order				
	Processing zone	Transfer/expansion of production between factories within the business partner and between departments within the factory				
		Outsourcing rather than in-house production within a business partner, or vice versa, change between non-business partners				
	Inspection condition and method	Change of inspection method and standard				
	Material	Change of supplier, grade and specification				
	Products and parts	Change of specification, packaging form, material and grade				
others	(Changes that do not apply to the above)					

○: Submission required, (○): Submission required when requested by the Company,-: Submission not required

Note) The report that needs to be submitted depends on the type of procured item.

4. Explanation of each material to be submitted

(1) Customer Product Environmental Guarantee System

Survey Form (TC12-A02 / 01)

- a. Please perform a self-diagnosis using the "Business Partner Product Environmental Guarantee System Survey Form" and fill in the basic information, self-evaluation results (conformity / partial-conformity / nonconformity) for each question, and the answer column (optional).
- b. This "Business Partner Product Environmental Guarantee System Survey Form" is created based on the "Guidelines for the Management of Chemicals in Products(CiP)-Annex Check Sheet" issued by the Joint Article Management Promotion-consortium (JAMP).
- c. Regarding the submission method, please submit as an Excel file.

(2) Non-use warranty (TC12-A02 / 03)

- a. Please enter the company name, responsible person name, company seal, and issue date for each part number.
- b. For the items related to "Specific prohibited substances", please enter the product name, product number, and the analysis end date of the 10 substances in the RoHS2 Directive.
- c. For items related to "regulated substances", check the "List of regulated substances" (TC12-A02 / 06), and whether or not the regulated substances are contained (if they are contained, the content rate, purpose of inclusion, alternative plan). Please report.
- d. For halogen-free and antimony-free products, please report the intentional / unintentional content, content rate, and purpose of content.
- e. Regarding red phosphorus, please report whether it is used or not.
- f. Regarding the parts (raw materials, parts, etc.) that make up our products and the auxiliary materials that accompany the products such as packaging materials and labels, which are delivered to customers at the time of new delivery and thereafter (from the analysis end date) every year. Please submit it. For other procured items, we may ask you to submit them as necessary.

(3) Analysis report

- a. Chemical substances to be investigated
Please submit an analysis report of 10 RoHS2 regulated substances designated as "specific prohibited substances" and chemical substances such as halogen regulated substances (chlorine, bromine) that we request analysis as necessary. ..
- b. Analysis target
Please analyze each homogeneous material of the procured product and calculate the content rate (ppm) by $(\text{content} \times 1000000 \div \text{homogeneous material mass})$. Homogeneous material here refers to a substance that cannot be further decomposed physically and chemically.
- c. Analytical method
The table below shows the detection limits, pretreatment and analysis methods of the chemical substances to be investigated.
However, if the analyzer used does not meet the detection limit, please inform us in advance of the reason before submitting the analysis report.
Regarding the analysis method, please note that fluorescent X-ray analysis with insufficient accuracy cannot be applied to the analysis method.
In addition, if our customers request analysis reports for substances other than the above, we may ask our business partners to submit analysis reports for the substances.

Table 3. Detection limit and analysis method of regulated substances

Controlled substances	Substance to be analyzed	Detection limit (Note 2)	Pretreatment and analysis method	
RoHS2 Controlled substances	Cd	Less than 2ppm	IEC62321 compliant pretreatment and analysis methods Please describe.	
	Pb	Less than 2ppm		
	Hg	Less than 2ppm		
	Cr (VI)	Less than 8ppm		
	PBB (Note 1)	Less than 5ppm		
	PBDE (Note 1)	Less than 5ppm		
	DEHP (di-2-ethylhexyl phthalate)	Less than 50ppm		
	BBP (butyl benzyl phthalate)	Less than 50ppm		
	DBP (di-n-butyl phthalate)	Less than 50ppm		
	DIBP (diisobutyl phthalate)	Less than 50ppm		
halogen	Cl	Less than 50ppm	EN14582: 2007	Ion chromatography or Analytical methods with equal or better analysis accuracy
	Br	Less than 50ppm		
Antimony as well as That compound	Sb	Less than 2ppm	Please describe the pretreatment method and analysis method in accordance with IEC62321.	

(Note 1) For PBB and PBDE, analysis of metals, glass, and ceramics as homogeneous materials is not required.

(Note 2) If the detection capability of the analyzer exceeds the detection limit, we will consult with you individually.

d. Items to be described

The analysis report should be written in English or in both Japanese and English, and please attach all the following 7 items.

- Analysis end date
- Analyst name, analysis manager name, third-party analysis institution name
- Please specify in the flow the pretreatment method (flow) and complete dissolution.
- Analysis method
- Detection limit
- result of analysis
- Color photograph of the sample (the photograph should show the appearance and properties of the sample to be analyzed)

If the above 7 items are not filled in in the report, we will ask you to resubmit.

Regarding the raw materials, parts and packaging materials that make up our products, please refer to the analysis report.

The expiration date is one year from the end date of the analysis.

e. Analytical institution

The above analysis report is limited to those issued by a third-party analytical institution that has acquired ISO 17025 accreditation for the substance to be analyzed.

(4) Product-containing substance survey form (TC12-A02 / 05)

- a. Please fill in and seal the content information (component name, CAS No., content rate, content purpose) of the constituents of the product and report it.
- b. "Constituent information" refers to the component name (chemical substance name), CAS. Please enter No, content rate (wt%; 2 significant figures), and purpose of content.
- c. CAS. Regarding No., please disclose the substances that correspond to our regulated substances. In addition, regarding non-applicable substances, the total content rate up to 10% can be undisclosed. However, even if it is not disclosed, we will request disclosure if we deem it necessary or if there is a request from our customer.
- d. Regarding the content of constituents, please describe so that the total content of each component is 100%.

(5) Safety Data Sheet SDS

- a. We will utilize SDS for occupational safety and health management, wastewater treatment management, waste management, etc., so please submit an SDS that complies with JIS Z 7253: 2012.
- b. Please submit it at the time of new purchase and each time it is revised due to law revision or other changes. However, due to our customer's request, we may ask you to submit it irregularly even if there is no revision.
- c. As a general rule, please describe in the main language of the country of procurement. However, depending on the type of procured item and customer requirements, we may ask you to write in the language specified by us.
- d. Regarding the description of SDS, in Section 15 (Applicable Laws), substances subject to the PRTR Law (Class 1 Designated Chemical Substances) (http://www.meti.go.jp/policy/chemical_management/law/prtr/pdf) Please describe the non-existence of /engsindai1.pdf).

(6) Cleanliness Substance Survey Form (TC12-A02 / 06)

- a. Regarding the materials designated by us (raw materials / parts and auxiliary materials used for HDD items, etc.), the analytical values of substances subject to cleanliness (organic silicone, anions, cations), the lower limit of detection of the analyzer, and the analytical method are performed according to the analysis procedure. Please fill in and attach the analysis report (or analysis data) to the questionnaire and report it.

(7) Other survey documents such as chemSHERPA

Certain customers may request the submission of other survey documents such as chemSHERPA. We will contact you individually regarding the scope, survey method, response method, etc., so please cooperate.

(8) Answer method

Regarding the response method, please submit the "Business Partner Product Environmental Guarantee System Survey Form" as an Excel file and other materials as a PDF file in principle.

(9) Handling

Of the reports submitted, the analysis report and SDS may be used as non-containing evidence for environmentally hazardous substances such as 10 RoHS2 regulated substances for our customers. Other documents will not be published.

5. Handling of guidelines

The handling of this guideline for business partners is as follows.

- (1) The latest version of this guideline will be published on our website each time it is revised.
If you are a business partner, please always check the latest version and use it as a download.
- (2) Every time this guideline is revised, we will notify the business partners who are doing

business with the revision.

6. About the handling of personal information

The personal information of our business partners will be used only for the purpose of confirming the contents of matters related to the Green Procurement Survey. In addition, if necessary, our MEKTEC Group companies and contractors may use it, but we will use it only for the above purposes.

7. Contact information

For inquiries regarding this matter, please contact the following.

NIPPON MEKTRON, LTD.

Management Dept. Purchasing Sec.

Phone: 029-830-9161 FAX: 029-830-9158

Environmental & Safety Dept.

Phone: 029-830-9268 FAX: 029-830-9158

8. Revision history

Ver number System / revision date	Details of revision
Ver.1 2007/08/20	Newly established.
Ver.2 2012/03/23	<p>Complete review of green procurement guidelines.</p> <ul style="list-style-type: none"> ▪ Environmental policy → Basic environmental policy, and the contents have been completely changed. <p>-Addition of materials submitted by business partners and addition of explanations.</p> <ul style="list-style-type: none"> ▪ Change the style name. <p>"Survey form on environment-related substances contained in products" → "Survey form on substances contained in products"</p> <p>"Survey Form on FPC-Regulated Substance Amount" → "Cleanliness Material Survey Form"</p> <p>"List of prohibited / completely abolished / controlled chemical substances" → "List of regulated substances"</p> <p>Change of style.</p> <ul style="list-style-type: none"> ▪ Non-use warranty, analysis data list, product-containing substance survey form, Cleanliness substance questionnaire, list of regulated substances
Ver.3 2017/11/13	<p>-Change of wording (RoHS Directive-> RoHS2 Directive, Halogen Free-> Halogen Regulation, etc.).</p> <ul style="list-style-type: none"> ▪ Change of wording (NIPPON MEKTRON, LTD. → MEKTEC Group). <p>-Addition of guidelines ("Protecting biodiversity").</p> <ul style="list-style-type: none"> ▪ Review of other wording.
Ver.3.1 2021/08/01	<ul style="list-style-type: none"> ▪ Changes in the format of the "Customer Product Environmental Guarantee System Survey Form" and the accompanying changes in evaluation criteria. <p>-Deleted MSDSplus / AIS and added chemSHELPA.</p> <p>-Review (simplification) of material explanations.</p> <ul style="list-style-type: none"> ▪ Review of other wording. ▪ Deletion of cooperation agreement