

SAXA Group

Green Procurement Guidelines

Introduction

In May 2022, we, the SAXA Group, established "SAXA Group Sustainability Policy" and declared that we would promote, based on the policy, our activities aimed at realizing a sustainable society and contribute to the development of a vibrant and comfortable society. We also established "SAXA Group Sustainable Procurement Guidelines" in order to fulfill, together with our suppliers, our corporate social responsibilities.

Meanwhile, turning to the management of chemical substances in products, which is recognized as one of corporate social responsibilities regarding sustainability, laws and regulations related to chemical substances in products, typified by EU RoHS Directive, are increasing year after year and those similar to RoHS Directive are now expanding to various countries.

Additionally, the number of chemical substances, the use of which in electrical and electronic products requires to be managed, has been increasing, as can be seen in the addition and the publication of new Substances of Very High Concern (SVHC) in EU: REACH Regulation SVHC candidate list, the expansion of regulations on Per- and Polyfluoroalkyl Substances (PFASs) in the Stockholm Convention on Persistent Organic Pollutants (POPs), and so forth. As a result, there are customers, even in the domestic market, who need the provision of information about chemical substances in products, the information being obtained by tracking back the supply chain, as well as that of products containing no substances subject to regulation.

Along with the establishment of "SAXA Group Sustainable Procurement Guidelines", we, the SAXA Group, reviewed the positioning of "SAXA Group Green Procurement Guidelines" that we have been operating, and corrected the same guidelines in order to use them as those complementing the content, regarding the management of chemical substances in products, of "SAXA Group Sustainable Procurement Guidelines".

We ask you, our suppliers, to have the understanding of our approaches to the management of chemical substances in products. Also, we look forward to your cooperation with us about requirements regarding such products as members and parts we procure, the requirements being defined by "SAXA Group Green Procurement Guidelines" stated above.

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SAXA Group Green Procurement Guidelines

1. Objective

The purpose of the Guidelines is to indicate, with the intention of manufacturing products with consideration to the environment in accordance with "SAXA Group Sustainability Policy", information received from our business partners who have been performing appropriate management of chemical substances in products, the information being about concepts and operations concerning goods procurement with consideration to regulations on chemical substances in products.

2. Scope of Application

The Guidelines are applied to our business partners who deliver finished products, semi-finished products, parts, materials, packaging materials (*2), and secondary materials (referred to as "procured items") that constitute products sold by the SAXA Group (*1), and to the procured items.

Please note that when presenting standards and requests different from those defined by the Guidelines in individual specifications, etc. due to requests from the customers of the SAXA Group or other circumstances, you are requested to give priority to individual standards and requests.

*1: Excluding other companies' products that are sold without being processed at all.

*2: Cardboard, plastic bag, PP tape, packing label, and cushioning material that are provided, integrally with products, to the SAXA Group's ship-to. However, packaging materials used for the convenience of transportation (e.g., stretch film, band) and those collected by the SAXA Group (e.g., returnable container, palette) are excluded.

3. Requests to Our Business Partners

We, the SAXA Group, ask you, our business partners, to cooperate with us with regard to the following matters, in order to manufacture products with consideration to the environment.

3.1 Matters Concerning Our Business Partners

1) Establishment and Operation of Environmental Management System

We ask you to acquire certification for environmental management systems, such as the ISO 14001 international standard and the Eco-Action 21 system, or establish and operate other mechanisms for reducing environmental impact.

The environmental impact reduction indicates activities for promoting environmentally conscious design of products including procured items (the energy saving, the resource saving, the simplified recycling, and the waste reduction of products), the energy saving, the resource saving, the waste reduction, and the green procurement during business activities, and the prohibition and reduction of the use of hazardous substances in the manufacturing process*, etc.

If you have not acquired certification for environmental management systems, please identify your goals and issues concerning the environment, including the aforementioned matters, and perform environmental impact reduction activities.

* Substances whose use is prohibited in the manufacturing process.

Attachment: "Management Standards of Chemical Substances in Products" a. Contained Prohibited Substances No. 13 Ozone depleting substances (ODS). –Please note that the use of such substances, for any purpose other than in the manufacturing process of delivered products, such as analysis/measurement and product development, or in refrigerator and air-conditioner, is excluded.

2) Establishment and Operation of Management System of Chemical Substances in Products

- We recommend that you formulate the action items of the management system of chemical substances in products in accordance with JIS Z 7201: "Management of chemicals in products -- Principles and guidelines" and "Guidelines for the Management of Chemical Substances in Products" by JAMP.
- The guidelines require that RoHS restricted substances be included in chemical substances to be managed by the management system of chemical substances in products.
- Your systems are not required to be independent, i.e., you are able to incorporate, for operation, your implementation matters concerning the management of chemical substances in products into ISO9001 (Quality management systems) and ISO14001/Environmental Management System. In such cases, you are requested to refer to JIS Z 7201: "Management of chemicals in products -- Principles and guidelines" and align your implementation matters with those defined therein.

3) Cooperation in Investigation of Chemical Substances in Products (Management Status Investigation and Content Investigation)

We ask you to cooperate with us in performing the investigations defined in "4. Operation Procedures" of the Guidelines.

In particular, the investigation of chemical substances in products is important, because it helps us confirm that our products comply with various regulations and requests from our customers. –We plan to ask you to perform the investigation of chemical substances in products, as needed, for individual products, customer support, etc., so we appreciate your prompt response every time.

3.2 Matters Concerning Procured Items

- 1) Nonuse of Contained Prohibited Substances Defined by the SAXA Group
 - For contained prohibited substances and threshold level, etc., please refer to Attachment: "Management Standards of Chemical Substances in Products".
- 2) Submission of Nonuse Certificate Concerning Contained Prohibited Substances
 - We may ask you to submit a nonuse certificate in accordance with our customers' requests.
- 3) Management and Submission of Use Data Concerning Contained Prohibited Substances and Managed Substances Defined by the SAXA Group

* For contained prohibited/managed substances, please refer to Attachment: "Management Standards of Chemical Substances in Products".

4. Operation Procedures

With regard to the requests in "3. Requests to Our Business Partners" of the preceding paragraph, we will investigate the statuses of you, our business partners, concerning the environmental consideration and chemical substances contained in procured items, and determine procurement destinations and items that we procure on the basis of your replies.

4.1 Investigation of Our Business Partners

We will investigate the status of your approaches to (1) and (2) of "3.1 Matters Concerning Our Business Partners" and consider your replies as the materials for selecting procurement destinations.

The investigation will be conducted at the start of business transactions and during the business partner investigation that is periodically conducted. We ask you to fill in the questionnaire sent by the SAXA Group and submit it to the specified destination for replies. Please note that we may ask you to submit the materials related to your replies.

4.2 Investigation, Etc. Concerning Procured Items

- 1) Investigation of the content status of chemical substances in products

With regard to the content status of managed chemical substances of the SAXA Group, we will conduct investigations using chemSHERPA-AI/chemSHERPA-CI that are operated by Joint Article Management Promotion-consortium (JAMP). We ask you to fill in "chemSHERPA-AI/chemSHERPA-CI" and submit it to the specified destination for replies.

4.3 Changes Made to Responses

In cases there is any change to part of the replies to you have already submitted, regarding 4.1 and 4.2 stated above, the part relating to elements that may affect

the management of chemical substances in products (e.g., 4M), the questionnaire needs to be resubmitted promptly.

5. Others

5.1 Revision, Etc. of Green Procurement Guidelines

The Guidelines are subject to revision due to changes in national and international regulations, social conditions, new findings, etc. –In cases where any revision occurs/occurred, we will promptly contact you.

5.2 Handling of Submitted Materials, Data, Etc.

Submitted materials, data, etc. shall be managed at the SAXA Group's own risk.

5.3 Request for Improvement of Matters Concerning Environmental Consideration

We may ask you to improve your operations due to your replies, delivery status, and so forth.

We ask you, our business partners, to have the understanding of the green procurement, cooperate with us, and promote aggressive activities aimed at improving consideration to the environment.

5.4 Reference Documents

For interpretation of the content of the Guidelines, please refer to the following materials.

1) JIS Z 7201: "Management of chemicals in products - Principles and guidelines"

2) JAMP: "Guidelines for the Management of Chemicals in Products"

<https://chemsherpa.net/english/docs/guidelines#guideline2>

3) If you provide your replies using chemSHERPA-AI/chemSHERPA-CI, please refer to the following URL for the data preparation assistance tool and the user Guide.

<https://chemsherpa.net/english/tool/>

5.5 Version History

Months and Years	Version No.	Revisions
2009.4	Ver.1	Establishment *Japanese only
2014.1	Ver.2	Changes associated with the dissolution of JGPSSI and the change of managed substances in respect with IEC Standards. *Japanese only
2016.10	Ver.2.1	The modification of the application range of the SAXA Group and the contact information. *Japanese only
2018.11	Ver.3	- The change of substances prohibited/managed by the SAXA Group. - The change of the investigation tool from JGPSSI and AIS to chemSHERRA. - The change of the applicable range of Group Companies. *Japanese only
2025.7	Ver.4	- Revision associated with the establishment of "SAXA Group Sustainable Procurement Guidelines". - Addition of new substances to those prohibited by the SAXA Group.
2026.10	Ver.4.1	Revision due to changes in "Destination/Contact Information"

5.6 Destination/Contact Information

SAXA, Inc.

Human Resources & General Affairs Dept.

e-mail : sustainability@saxa.co.jp

Attachment: "Management Standards of Chemical Substances in Products"

In the SAXA Group, chemical substances to be investigated are ranked as follows for management.

- a. Contained Prohibited Substances: Substances whose use in procured items is prohibited, while reference to "Threshold Level" is required.
- b. Contained Managed Substances: Substances whose use in procured items needs to be reported.

a. Contained Prohibited Substances

No.	Substance/Substance Group	Major Applicable Laws and Regulations	Threshold Level, etc.	Examples of Use
1	Cadmium/Cadmium compounds	- EU RoHS Directive - EU REACH (Annex XVII)	- Content of more than 100 ppm in homogeneous material, except for exemptions under RoHS.	Pigment, anti-corrosion surface treatment, electrical and electronic material, optical material, stabilizer, plating, pigment for resin, fluorescent lamp, electrode, soldering, electrical contact, contact, zinc plating, PVC stabilizer
		- EU PPWR	- Refer to *1 for details.	Pigment, painting, PVC stabilizer
		- EU Battery Regulation	- Refer to *2 for details.	NiCd battery
2	Chromium (VI) compounds	- EU RoHS Directive	- Content of more than 1,000 ppm in homogeneous material, except for exemptions under RoHS.	Pigment, paint, ink, catalyst, plating, anti-corrosion surface treatment, dye
		- EU PPWR	- Refer to *1 for details.	Pigment, paint, PVC stabilizer
3	Lead/Lead compounds	- EU RoHS Directive - EU REACH (Annex XVII)	- Content of more than 1,000 ppm in homogeneous material, except for exemptions under RoHS.	Rubber curing agent, pigment, painting, lubricant, plastic stabilizer, battery material, free-cutting alloy material, optical material, X-ray shielding, electric solder material, mechanical solder material, rubber vulcanization material, ferroelectric material, resin stabilizer, plating material, alloy composition, resin additive
		- CA Prop 65	- Content of more than 300 ppm in the surface coating of cable/cord (thermoset/thermoplastic coating).	Pigment, paint, plastic stabilizer, coloring agent
		- EU PPWR	- Refer to *1 for details	Pigment, painting, PVC stabilizer
		- EU Battery Regulation	- Refer to *2 for details	Manganese battery, alkaline button battery

4	Mercury/Mercury compounds	- EU RoHS Directive - EU REACH (Annex XVII)	- Not intentionally added, and content of more than 1,000 ppm in homogeneous material, except for exemptions under RoHS.	Fluorescent lamp, electrical contact material, pigment, anti-corrosion agent, switches, high-efficiency emitter, antibacterial treatment
		- EU PPWR	- Refer to *1 for details	Pigment, painting, PVC stabilizer
		- EU Battery Regulation	- Refer to *2 for details	Silver oxide button battery, Alkaline battery, manganese battery
5	Polybrominated biphenyls (PBBs)	- EU RoHS Directive - CSCL	- Content of more than 1,000 ppm in homogeneous material.	Flame retardant
6	Polybrominated diphenyl ethers (PBDEs)	- EU RoHS Directive - CSCL	- Not intentionally added, and content of more than 1,000 ppm in homogeneous material.	Flame retardant
7	Bis (2-ethylhexyl) phthalate (DEHP) CASNo.117-81-7	- EU RoHS Directive	- Content of more than 1,000 ppm in homogeneous material.	Plasticizer, dye, pigment, paint, ink, adhesive
8	Butyl benzyl phthalate (BBP) CAS No.85-68-7	- EU RoHS Directive	- Content of more than 1,000 ppm in homogeneous material.	Plasticizer, dye, pigment, paint, ink, adhesive
9	Dibutyl phthalate (DBP) CAS No.84-74-2	- EU RoHS Directive	- Content of more than 1,000 ppm in homogeneous material.	Plasticizer, dye, pigment, paint, ink, adhesive
10	Diisobutyl phthalate (DIBP) CASNo.84-69-5	- EU RoHS Directive	- Content of more than 1,000 ppm in homogeneous material.	Plasticizer, dye, pigment, paint, ink, adhesive
11	Asbestos	- EU REACH (Annex XVII) - TSCA	- Not intentionally added	Electrical insulator, filler, heat insulating material, friction material
12	Azocolourants and azodyes which form certain aromatic amines	- EU REACH (Annex XVII)	- Not intentionally added	Pigment, dye, coloring agent
13	Ozone depleting substances (ODS)	- Montreal Protocol	- Not intentionally added	Refrigerant, foaming agent, extinguishing agent, cleaning agent
14	Polychlorinated biphenyls (PCBs)	- CSCL - EU POPs Regulation - TSCA	- Not intentionally added	Insulation oil, lubricant oil, electrical insulator, solvent, electrolyte, fire retardant, flame retardant, dielectric sealant
15	Polychlorinated terphenyls (PCTs)	- EU REACH (Annex XVII)	- Not intentionally added, and content of more than 50 ppm in homogeneous material.	Insulation oil, lubricant oil, electrical insulator, solvent, electrolyte, plasticizer, coating agent for electric wire and cable, dielectric sealant
16	Polychlorinated Naphthalenes	- CSCL - EU POPs Regulation	- Not intentionally added	Lubricant oil, paint, plastic stabilizer (electrical characteristics, fire resistance, water resistance), electrical insulator, flame retardant

17	Short-chain chlorinated paraffins (10-13 carbon atoms)	- CSCL - EU POPs Regulation - EU REACH	- Not intentionally added, and content of more than 1,000 ppm in molded product.	PVC plasticizer, flame retardant
18	Tri-substituted organotin compounds(*3)	- CSCL - EU REACH (Annex XVII)	- Not intentionally added, and tin-element content (*3) of more than 1,000 ppm in part.	Stabilizer, antioxidant, antibacterial agent, antifungal agent, antifouling agent, paint, pigment
19	Bis (tributyltin) oxide (TBTO)	- CSCL - EU REACH	- Not intentionally added	Preservative, anti-fungal agent, paint, pigment, stain-resistant agent, refrigerant, foaming agent, extinguishing agent, cleaning agent
20	Dibutyltin (DBT) compounds (*3)	- EU REACH (Annex XVII)	- Tin-element content of more than 1,000 ppm in part.	PVC agent, curing catalyst for silicone resin and urethane resin
21	Dioctyltin (DOT) compounds (*3)	- EU REACH (Annex XVII)	- Tin-element content of more than 1,000 ppm in part. (a) Fabric/leather product intended to be in contact with skin. (b) Childcare product (c) Two-part room temperature curing molding kit	PVC agent, curing catalyst for silicone resin and urethane resin
22	Dimethyl fumarate (Fumaric Acid Dimethyl Ester) (DMF)	- EU REACH (Annex XVII)	- Content of more than 0.1 ppm in part	Insecticide, anti-fungal treatment of electronic leather seat including reclining/massage chair
23	Perfluorooctane sulfonates (PFOS)	- CSCL - EU POPs Regulation	- Intentionally added, or content of more than 1,000 ppm in part	Charging treatment for film and plastic
24	2-(2H-1,2,3-benzotriazol-2-yl)-4,6-di-tert-butylphenol	- CSCL - EU POPs Regulation	- Not intentionally added	Adhesive, paint, printing ink, plastic, ink ribbon, putty, filler for calking or sealing
25	Hexabromocyclododecane (HBCDD) and all major diastereoisomers	- CSCL - EU POPs Regulation	- Not intentionally added, and content of more than 100 ppm in molded product.	Flame retardant (mainly foamed polyethylene)
26	Perfluorooctanoic acid (PFOA), its salts and PFOA-related substances	- CSCL - EU POPs Regulation	- Not intentionally added	Fabric, picture coating for film/paper/printing original, parts and materials for other products
27	Perfluorocarboxylic acids (PFCAs) C9-C14, its salts and PFCAs-related substances	- EU REACH (Annex XVII)	Density of more than the following thresholds in molded product. - Total content of 25 ppb for PFCA and its salt of C9-C14 - Total content of 260 ppb for PFCA-related substances	Fluoropolymer processing aid, surfactant
28	Perfluorohexanesulphonic acid (PFHxS), its salts and PFHxS-related substances	- CSCL - EU POPs Regulation	- Not intentionally added	Plating, coating, foam extinguishing agent, abrasive and cleaning agent, fabric

29	Decabromodiphenyl ether (DecaBDE)	- CSCL - EU POPs Regulation - TSCA	- Not intentionally added	Flame retardant
30	Tris (isopropylphenyl) phosphate (PIP (3:1))	- TSCA	- Not intentionally added	Adhesive, plasticizer, flame retardant, coating
31	Pentachlorothiophenol (PCTP)	- TSCA	- Content of more than 1wt% in molded product	Rubber processing aid
32	UV-328	- CSCL - EU POPs Regulation	- Not intentionally added	UV absorber
33	Dechlorane Plus (DP)	- CSCL - EU POPs Regulation	- Not intentionally added	Flame retardant, adhesive

- *1. The total content of 4 heavy metal substances: lead, mercury, hexavalent chromium, and cadmium is less than 100 ppm for each of materials constituting packaging (ink, resin, paint, etc.).
- *2. With regard to battery, the threshold of cadmium is 20 ppm (portable battery), the threshold of mercury is 5 ppm, and the threshold of lead is 100 ppm (portable battery). The denominator of the density calculation is the gross weight of battery.
- *3. The elemental equivalent value is used for densities within the target range.

b. Contained Managed Substance

No.	Targeted Laws and Regulations and Industrial Standards	Note
1	Japan CSCL Class I Specified Chemical Substances	Excluding prohibited materials defined by this provision
2	US Toxic Substances Control Act: TSCA Prohibited/Restricted Substances (TSCA Section 6(H))	Excluding prohibited materials defined by this provision
3	EU POPs Regulation (EC) No 850/2004 ANNEX	Excluding prohibited materials defined by this provision
4	EU REACH (EC) No 1907/2006 Candidate List of (Substances of Very High Concern) SVHC for Authorisation and ANNEX XIV (Substances Subject to Authorization)	Excluding prohibited materials defined by this provision
5	EU REACH (EC) No 1907/2006 ANNEX XVII (Substances restricted under REACH)	Excluding prohibited materials defined by this provision
6	Global Automotive Declarable Substance List (GADSL)	Excluding prohibited materials defined by this provision
7	IEC 62474 DB Declarable substance groups and declarable substances	Excluding prohibited materials defined by this provision