

Green Procurement Guideline

8th Edition

July 2020

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[Exhibit]

- Form 1. Questionnaire on environmental conservation initiatives
- Form 2. Certificate of non-use of prohibited substances

Green Procurement Guideline (MBA014 36) 8th Edition

1. Introduction

Our lives have become rich and convenient due to advances in technology and economic development, but they are having a serious impact on the global environment, such as the loss of biodiversity caused by climate change and the

exhaustion of resources due to mass consumption of resources.

Recognizing these global environmental issues and promoting environmental

initiatives towards a sustainable society is an urgent issue for our company as well.

The Tamagawa Seiki Group has established Green Procurement Guideline in 2004 to provide products with less environmental impact to customers, and has been promoting green procurement activities on procurement items with the cooperation

of suppliers.

In recent years, the importance of environmental initiatives as a whole supply chain has increased, the tightening of laws and regulations such as the European RoHS Directive and REACH Regulation has progressed, and the environment surrounding

enterprises has undergone significant changes.

In order to respond to such changes, the Tamagawa Seiki Group decided that

review of this document is necessary and decided to issue the 8th edition.

We sincerely hope to further develop our efforts toward "Harmony with the global

environment" with you, so we ask for your cooperation from our suppliers.

Tamagawa Seiki Co., Ltd.

Person responsible for environmental

management system execution

2. Purposes

These guidelines show the Green Procurement Standards for procurement items purchased by the Tamagawa Seiki Group (hereinafter referred to as "Tamagawa Seiki"). Tamagawa Seiki promotes efforts towards harmony with the global environment and aims to build a sustainable society by developing environmentally conscious manufacturing throughout the supply chain including our business partners.

3. Scope of application

Applicable to all procurement items purchased by Tamagawa Seiki below, all our suppliers who will deliver them shall be covered.

- (1) Raw materials, parts, and unit goods used for Tamagawa Seiki's products
- (2) Outsourced items that Tamagawa Seiki outsources to vendors for manufacturing and processing
- (3) Supplementary materials jigs and tools used in the production process of Tamagawa Seiki
- (4) Packing materials used for Tamagawa Seiki products
- (5) Products that Tamagawa Seiki outsources to vendors for designing and manufacturing and sells as Tamagawa Seiki brand

4. Tamagawa Seiki's environmental conservation activities

4.1 Basic policies

Tamagawa Seiki has established environmental protection as one of its basic policies, recognizing that "environmental conservation is a mission imposed on a company, recognizing this as one of the important pillars of business activities, and we take responsibility for ourselves and work on environmental conservation activities throughout the company under the environment policy".

We will promote environmental conservation activities with the "business activities in harmony with nature and the environment - environment improvement activities coordinated with local communities - business activities that stakeholders can feel secure" as the action guidelines.

4.2 Environment policy

Environment Policy

Based on corporate philosophy of "Striving to build an industry ready for the 21st century through creative business activities, contributing to the economic revitalization of communities", as Tamagawa Seiki we make improving the environment a part of every step we take.

- As a company blessed by the beautiful greens of nature that surround us, we fulfill
 compliance obligation to environmental laws and regulations by striving to prevent
 pollution, make a use of sustainable resource, extenuate the climate change and adapt to
 climate change, and protect biodiversity and eco-systems.
- 2. We establish environmental objectives for the below business activity, products, and services, and work for continual improvement in order to advance environmental performance.
 - Approach to low carbon society
 Eco-friendly product lifecycle, energy saving
 - Preservation of resources Waste reduction, resource saving
 - 3. Coexisting with nature
 - Zero-environmental pollution, reduction of environmental load substance
 - 4. Responsible business activity

 Compliance to environmental laws and regulations, regional contribution
- 3. We demonstrate our responsibility to the community in collaborating with other companies and organizations to continuously engage in groundbreaking initiatives and contribute to the sustainable development of communities.

November 21, 2016 Shigeo Seki President and Chief Operating Officer, Tamagawa Seiki Co., Ltd.

Shigeo Seki

5. Tamagawa Seiki's Green Procurement Standards (Requirements)

5.1 Approach to Tamagawa Seiki's Green Procurement

In addition to the procurement standards such as the "quality", "delivery date", "price" and so forth, Tamagawa Seiki's basic idea is to purchase procurement items preferentially from suppliers who consider the environment.

Tamagawa Seiki's Green Procurement

Procurement items to be incorporated into Tamagawa Seiki's products/procurement items shipped with Tamagawa Seiki's products (Example: finished products, parts, members, packaging materials)

Other procurement items (Example: services, production/test equipment)

◆ Suppliers

- 5.2 Establishment of environmental management system
- 5.3 Establishment of management system of environmentally hazardous substances
 - >> Submission of
 Form 1 "Questionnaire on
 environmental conservation
 initiatives"

◆ Procurement item

- 5.4 Provide information on environmentally hazardous substances
 - >> Survey response (individual request)
- 5.5 Guarantee non-use of prohibited substances
 - >> Submission of Form 2 "Certificate of non-use of prohibited substances" (individual request)

◆ Suppliers

- 5.2 Establishment of environmental management system
- 5.3 Establishment of management system of environmentally hazardous substances
 - >> Submission of
 Form 1 "Questionnaire on
 environmental conservation
 initiatives"

5.2 Establishment of environmental management system (All our suppliers)

We kindly ask our suppliers to promote environmental protection measures, and establish an environmental management system that can be continuously improved. Suppliers' environmental management system will be evaluated with submitted Form 1 "Questionnaire on environmental conservation initiatives", based on whether the system satisfies either one of requirement (1)~(3).

- (1) You have acquired ISO 14001 external certification.
- (2) You have acquired certification of the following environmental management system promoted by the country, local government, and others.

Management system name	Supervising organization	
Eco-Action 21	Ministry of Environment	
Eco-Stage	Eco Stage Institute	
KES (Kyoto Environmental Management System Standards)	KES Environment Organization	
Minami Shinshu EMS 21	Minami Shinshu Wide Area Union	

- (3) If the above (1) and (2) are not satisfied, in Form 1 "Questionnaire on environmental conservation initiatives", the following essential items have to be addressed and there are 70 or more evaluation points.
 - You participate in environmental volunteer activities and community contribution activities.
 - You grasp the environmental laws that your should comply with and keep them up to date.
 - You have formulated policies including the contents of environmental management.
 - We set goals and implementation plans that lead to energy conservation and resource saving.
 - · We monitor, measure, analyze and evaluate targets and compliance efforts.
 - We reviewed the initiatives and the representative gives directions to the results.

5.3 Establishment of management system of environmentally hazardous substances (Suppliers related to products)

We ask our suppliers that deliver procurement items to be incorporated into Tamagawa Seiki's products to establish the management system of environmentally hazardous substances based on the latest version of "Guidelines for Management of Chemicals in Products*".

* Guidelines for Management of Chemicals in Products:

https://chemsherpa.net/english/docs/guidelines

Supplier's environmental management system will be evaluated with submitted Form 1 "Questionnaire on environmental conservation initiatives"

In providing Tamagawa Seiki's products to customers, we may check the management system of environmentally hazardous substances of our suppliers.

5.4 Provide information on environmentally hazardous substances (Procurement items related to products)

We request our suppliers who deliver procurement items to be used in Tamagawa Seiki's products to grasp the contents of environmentally hazardous substances contained in procurement items.

In case we will request from Tamagawa Seiki, we will request suppliers to provide information on environmentally hazardous substances in the following submission format for procurement items.

Submission format	Format providing organizations			
chemSHERPA (components)	Ministry of Economy, Trade and Industry			
IMDS	Japan IMDS Service Center			
JAMA/JAPIA unified data sheet (JAMA sheet)	JAMA (Japan Automobile Manufacturers Association) JAMA (Japan Auto Parts Industries Association)			
Other (Information on environmentally hazardous substances required by customers of Tamagawa Seiki)				

- · Please use the latest version as requested from Tamagawa Seiki for the submission format.
- Please confirm the submission format from the website of the providing organizations below.

chemSHERPA (https://chemsherpa.net/english)

IMDS (https://public.mdsystem.com/en/web/imds-public-pages)

JAMA/JAPIA (https://www.japia.or.jp/en/top/)

- · Suppliers are responsible for the contents and concentrations of environmentally hazardous substances reported in the submission format.
- When there are changes in the information you provided, please provide the latest information.

5.5 Guarantee non-use of prohibited substances (Procurement items related to products)

Procurement items used in Tamagawa Seiki's products shall not include Appendix 1 "Prohibited substances^{*1}".

Regarding procurement items requested by Tamagawa Seiki, you will be required to submit one of the following, and ensure that the prohibited substances are not included or below the threshold.

- (1) chemSHERPA (compliance)
- (2) Green Procurement Guideline Form 2 "Certificate of non-use of prohibited substances"
- (3) Supplier written certification in its own style*2
- *1 : Prohibited substances are not applicable to some product categories, such as defense products and space products.
- *2 : Tamagawa Seiki guarantees that it does not contain the prohibited substances of the RoHS directive and REACH regulation.

6. Other

- (1) Please report to Tamagawa Seiki about environmental pollution accidents, violations of environmental laws and administrative guidance at business partners.
- (2) The contents of these guidelines may be changed without prior notice due to new regulations and social conditions and others.
- (3) Documents submitted will not be disclosed to the outside without your permission. However, component information on environmentally hazardous substances and the results of non-content determination may be provided to Tamagawa Seiki's customers.

7. Revision history

Version	Issued			
number	date	Contents		
1st edition	November 2004	1st edition issued		
2nd	December	· Clarified the target scope of business partners		
edition	2006	· Revised the environment policy		
		· Prescribed to abolish component report of delivered materials and		
		to use JGPSSI tool		
		· Transferred of PBB and PBDE from prohibited substances to		
		regulated substances		
3rd	March	· Clarified regulatory targets of prohibited substances		
edition	2007	· Clerical corrections		
4th	January	· Addition of an item of Management system of environmentally		
edition	2012	hazardous substances to the Green Procurement Standards		
		· Review of submission method of environmentally hazardous		
		substance data		
		· Review of Appendix 1 (Prohibited substances) and Appendix 2		
		(Prohibited substances with conditions)		
		· Clarification of the score of Form 1 (Questionnaire on		
		environmental conservation activity initiatives)		
5th	March	· Update of environment policy		
edition	2013	 Review of Form 1 (Questionnaire on environmental conservation initiatives) 		
		· Review of Appendix 2-1 (Exempted items)		
6th edition	February 2014	· Update of environment policy		
7th	May 2018	· Update of environment policy		
edition		· Changed the survey format of environmentally hazardous		
		substances (JAMP → chemSHERPA)		
		Review of Form 1 (Questionnaire on environmental conservation initiatives)		
		· Review of Form 2 (Certificate of non-use of prohibited substances)		
		· Review of target substances in Appendix 1 and Appendix 2		
8th edition	July 2020	Review of Form 1 (Questionnaire on environmental conservation initiatives)		
		· Review of Form 2 (Certificate of non-use of prohibited substances)		
		· Review of target substances in Appendix 1 (Prohibited substances)		

Appendix 1. Prohibited Substances

Appe	ndix 1. Prohibited Substances				
1	Lead	-	1,000ppm in homogeneous material		
2	Mercury	<u> </u>	1,000ppm in homogeneous material	EU RoHS 2011/65/EU	
3	Cadmium	<u> </u>	100ppm in homogeneous material		
4	Hexavalent chromium	<u> </u>	1,000ppm in homogeneous material		
5	Polybrominated biphenyls	<u> </u>	1,000ppm in homogeneous material		
6	Polybrominated diphenyl ethers	<u> </u>	1,000ppm in homogeneous material		
7	Bis(2-ethylhexyl) phthalate(DEHP)	117-81-7	1,000ppm in homogeneous material		
8	Benzyl butyl phthalate(BBP)	85-68-7	1,000ppm in homogeneous material		
\rightarrow	Dibutyl phthalate(DBP)	84-74-2	1,000ppm in homogeneous material		
\rightarrow	Diisobutyl phthalate(DIBP)	84-69-5	1,000ppm in homogeneous material		
	5-tert-butyl-2,4,6-trinitro-m-xylene(Muskxylene)	81-15-2	1,000ppm		
12	4,4'- Diaminodiphenylmethane(MDA)	101-77-9	1,000ppm		
	Hexabromocyclododecane(HBCDD)	134237-52-8 134237-51-7 25637-99-4 3194-55-6 134237-50-6	1,000ррт		
14	Diarsenic pentaoxide	1327-53-3	1,000ppm		
15	Diarsenic trioxide	84-69-5	1,000ppm		
16	Tris(2-chloroethyl)phosphate	115-96-8	1,000ppm		
\rightarrow	2,4-dinitrotoluene(2,4-DNT)	121-14-2	1,000ppm		
_	Trichloroethylene	79-01-6	1,000ppm		
\dashv	Formaldehyde, oligomeric reaction products with aniline	25214-70-4	1,000ppm		
20	Arsenic acid	7778-39-4	1,000ppm		
21	Bis(2-methoxyethyl) ether	111-96-6	1,000ppm		
_	1,2-dichloroethane(EDC)	107-06-2	1,000ppm	EU REACH	
\rightarrow	2,2'-dichloro-4,4'-methylenedianiline(MOCA)	101-14-4	1,000ppm	1907/2006/EC	
_		-		Annex XIV	
-	1-bromopropane(n-propyl bromide)	106-94-5	1,000ppm		
25	Diisopentyl phthalate	605-50-5	1,000ppm		
26	1,2-Benzenedicarboxylic acid, di-C6-8-branchedalkyl esters,C7-rich	71888-89-6	1,000ppm		
27	1,2-Benzenedicarboxylic acid, di-C7-11-branchedand linear alkylesters	68515-42-4	1,000ppm		
28	1,2-Benzenedicarboxylic acid, dipentyl ester,branched and linear	84777-06-0	1,000ppm		
29	Bis(2-methoxyethyl) phthalate	117-82-8	1,000ppm		
30	Dipentyl phthalate(DPP)	131-18-0	1,000ppm		
31	N-pentyl-isopentylphthalate	776297-69-9	1,000ppm		
\rightarrow	Anthracene oil	90640-80-5	1,000ppm		
\rightarrow	Pitch, coal tar, high-temp.	65996-93-2	1,000ppm		
34	+ (1,1,3,3-tetramethylbutyl)phenol,ethoxylated covering well-defined substances and UVCB substances, polymers and homologues		1,000ppm		
35	4-Nonylphenol, branched and linearsubstances with a linear and/or branched alkyl chain with a carbon number of 9 covalently bound in position 4 to phenol, covering also UVCB- and well-defined substances which include any of the individual isomers or a combination thereof	_	1,000ppm		
36	Polychlorinated terphenyls (PCTs)	<u> </u>	50ppm		
37	Asbestos fibres	-	Intentionally added		
38	Tri-substituted organostannic compounds	<u> -</u>	1,000ppm(concentration of tin mass)		
39	Dibutyltin(DBT)compounds	[_	1,000ppm(concentration of tin mass)		
40	Dioctyltin(DOT)compounds	_	1,000ppm(Two-component room temperature vulcanization molding kits (RTV-2 molding kits), concentration of tin mass)	EU REACH 1907/2006/EC	
41	Monomethyl-tetrachlorodiphenyl methane Trade name: Ugilec 141	76253-60-6	Intentionally added		
42	Monomethyl-dichloro-diphenyl methane Trade name: Ugilec 121, Ugilec 21	81161-70-8	Intentionally added	Annex XVII	
12	Monomethyl-dibromo-diphenyl methane bromobenzyl bromotoluene, mixture of isomers Trade name: DBBT	99688-47-8	Intentionally added		
44	Diphenylether, octabromo derivative C12H2Br8O	<u> </u>	Intentionally added		
\rightarrow	Dimethylfumarate (DMF)	624-49-7	0.1ppm		
-	Bis(pentabromophenyl) ether	1163-19-5	1,000ppm		
\rightarrow	Perfluorooctanoic acid and its salts	1.05 17 5			
4/	i ciriuorooctanoic aciu anu ns sans	<u> </u>	0.025ppm		

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