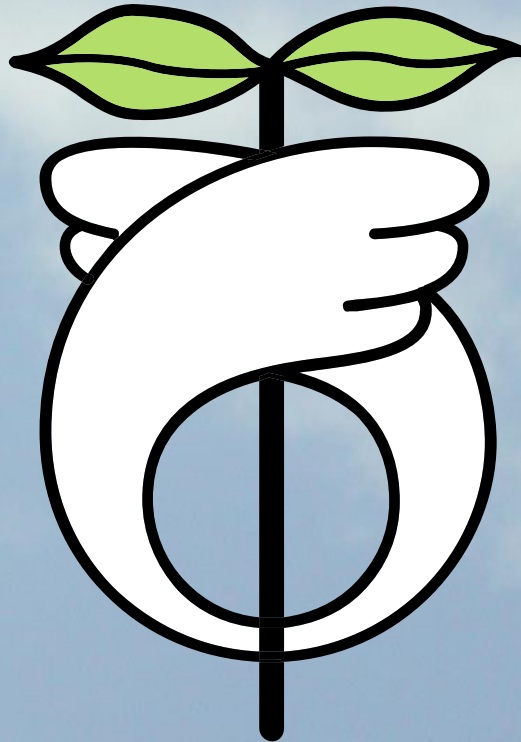


Green Procurement Guidelines

Edition 10



Date implemented: June 1, 2017

STANLEY ELECTRIC CO., LTD.

Stanley Group

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1. Introduction

Recently, global and environmental problems such as global warming, hazardous substances contained in products, and destruction of the ecosystem have been expanding, and thus the roles of companies have become more and more important.

Since Stanley Group (hereinafter referred to as “Stanley”) positions these problems as the most important subject of management, we will put individual and organizational powers together, enhance approaches to the environment, and drive forward to have the next generations take over the rich nature on the earth.

In addition, the reduction of environmental loads related to the life cycle of products as a whole through procurement, production, sales, application, disposal, and recycling in terms of raw materials is required for environmental conservation activities, and environmental approaches taken by individual companies are still insufficient.

For this reason, we, Stanley, will carry out a reduction of environmental loads and risks together with suppliers by promoting the eco-friendly procurement of materials as a link in the chain of procurement policies. Suppliers understanding of Stanley’s idea about environmental conservation activities and their cooperation in complying with these guidelines are greatly appreciated.

Stanley Electric Co., Ltd.
Yutaka Hiratsuka, Managing
Director In Charge of
Environmental Affairs and
Procurement

2. Stanley's Environmental Activities

With the aim of proactively engaging in environmental conservation activities, Stanley has established "Basic Environmental Principles" and "Environmental Policy" as well as announced an "Environmental Declaration."

1) Environmental Policy

We are committed to making environmental conservation efforts to achieve the goal of "not producing," "not using" and "not disposing" of substances that have an impact on the environment in order to become more environmentally friendly.

2) Basic Philosophy on the Environment

Stanley group will strive to "create new values in harmony with the environment" through all our corporate activities by reducing the environmental impact to a bare minimum, so that we can pass on the immeasurably rich blessings of our earth and its ecosystem to the next generation in a healthy state.

3) Environmental Policy

We recognize the role and responsibilities that each of us assumes, and act in accordance with the Basic Philosophy on the Environment throughout our business activities.

- (1) Throughout the life cycle of our business operations, products and services, we promote activities such as pollution prevention and the conservation of natural resources and energy, thereby reducing the environmental impact globally.
- (2) In addition to carefully observing the environmental laws and regulations of each country and region as well as other environmental agreements we conclude with other parties, when necessary, we apply voluntary environmental standards of our own on the basis of those regulations and agreements.
- (3) To implement our Environmental Policies, we specify environmental objectives, set up environmental targets, and regularly or extraordinarily re-examine the objectives and targets in view of current progress, thus ensuring continuous and proactive improvement.
- (4) We communicate our Basic Environmental Philosophy and Environmental Policies to all the persons working for Stanley Group, and we also gain the understanding and cooperation of our suppliers through informational efforts.
- (5) We make our Basic Environmental Philosophy and Environmental Policies accessible to the general public, and we report the progress of our environmental activities in order to increase communication with the local community, when requested.
- (6) We actively participate in the environmental conservation activities of the local communities in collaboration with governmental agencies or other local or affiliated organizations.

3. Applicable Scope

These guidelines shall apply to components of products such as parts, materials, sub-materials, and packaging materials that Stanley procures and to suppliers to whom Stanley delivers them. In addition, these apply to suppliers whom Stanley entrusts assembly of parts, materials and processes (forming, surface treatment, etc.).

【Applicable parts and materials】

- Parts, units, materials, and accessories such as product manuals
- Sub-materials used for products (such as adhesive tapes, soldering materials, adhesive agents, ink, etc.)
- Wrapping materials and packaging materials

4. Definition of Terminology

1) Containment

Whether the containment is intentional or not, it means that substances are contained in, adhere to or are mixed in with parts and/or materials that form Stanley products. In addition, those generated unintentionally during manufacturing processes are included as well.

2) Intentional containment

In order to improve performance or change a property, containment is conducted intentionally into parts and materials. In addition, it is regarded as intentional containment when use of relevant substances in manufacturing processes and containment in completed products is obvious.

3) Impurities

Substances that are contained in natural materials and cannot be excluded during refining processes or are generated in reaction processes and cannot be excluded technically.

4) Threshold value (allowable concentration)

Contained amount of a substance contained in parts or materials or a maximum allowable value of contained amount. When a compound part contains multiple materials in its parts, the containment concentration is not the value obtained by a denominator regarded as the whole of the parts but the one obtained in terms of the homogenous material that contains the object substance.

5) Homogenous material

Materials that are uniformly composed as a whole and cannot be mechanically separated into other materials.

(Examples: Metal alloys, polymer alloys, compounds, paint, adhesive agents, ink, paste, resin polymers, glass powder, ceramic powder, etc.)

Since parts that are painted, printed or coated can be separated mechanically into material parts and each of painted / printed / coated parts, can be a homogenous material. "Mechanical separation" means to separate materials by mechanical behavior like removing screws, cutting, smashing, grinding, abrading, etc.

6) Environmentally Hazardous Substance

Substances that have strong effect on human bodies and nature, and thus Stanley specifies and manages them according to the demands of legal regulations and customers.

7) Compound

A material in which two or more different substances are blended together without changing their natures and which can be separated out (by crystallization, evaporation, sublimation, filtration, etc.) without using other substances.

8) CMS (Chemical Substance Management System)

Management of substances contained in products shall be conducted properly through processes of raw material procurement, production and shipping. Stanley defines it according to "Guidelines for the management of chemical substances in products" (2nd version) issued by JAMP and JGPSSI.

9) JAMA/JAPI Standard Material Datasheet

A standard material datasheet agreed and standardized by JAMA (Japan Automobile Manufacturers Association) and JAPIA (Japan Auto Parts Industries Association) to investigate materials and substances contained in products

1 0) JAMP MSDSplus

A basic information communication sheet recommended by JAMP (Joint Article Management Promotion-consortium) to transmit information on chemical substances contained in products (substances/pharmaceuticals)

1 1) JAMP AIS

An Article Information Sheet recommended by JAMP as a basic information communication sheet to transmit information regarding chemical substances contained in articles

1 2) Green Procurement Survey Form (by former JGPSSI)

Substance investigation sheets specified by former JGPSSI (Japan Green Procurement Survey Standardization Initiative)

1 3) IMDS (International Material Data System)

Management system operated by major global automobile makers to collect and manage information regarding materials and chemical substances

1 4) GADSL

Global Automotive Declarable Substance List. Refer to <http://www.gadsl.org/>.

5. Request for Suppliers

1) Understanding and cooperation with Stanley' s environmental objectives, targets and requirements

Using its Basic Philosophy on the Environment and Environmental Policy as a basis, Stanley prepares documents that explain environmental objectives, targets and requirements and distributes them to its suppliers (specifically, management or those responsible). We appreciate suppliers' understanding these documents fully and cooperating in achieving the objectives and targets.

2) Request to construct Environmental Management System (EMS)

- (1) Suppliers are requested to have Eco Partner Certificates to construct, maintain and improve the Environmental Management System (hereinafter referred to as "EMS") by obtaining ISO14001 or equivalent certificates or by receiving a Stanley EMS audit. Procedures to acquire the Eco Partner Certificate are as follows.

《Procedures to acquire an Eco Partner Certificate》

When a supplier begins a new transaction, chose A, B, or C of "Environmental Conservation Activities Category" based upon the "Procedure for Selecting an Environmental Conservation Activities Category" shown in Fig. 1 and submit an "Application for an Environmental Conservation Activities Category" and "Questionnaire regarding Acquisition of Approval Certificate." The supplier is requested to acquire an Eco Partner Approval Certificate by following the procedure mentioned below. If he is not approved as an Eco Partner, transactions with Stanley shall be reconsidered.

[Refer to Fig. 2 for (Operation Flow of the Environmental Management System (Flow to Acquire Eco Partner Certification).)]

① "Category A"

- Suppliers that plan to obtain ISO 14001 certification within a year are requested to submit a timetable for the acquisition. When certification is acquired, submit a copy of the registration certificate and appendix or other documents verifying the acquisition of certification.

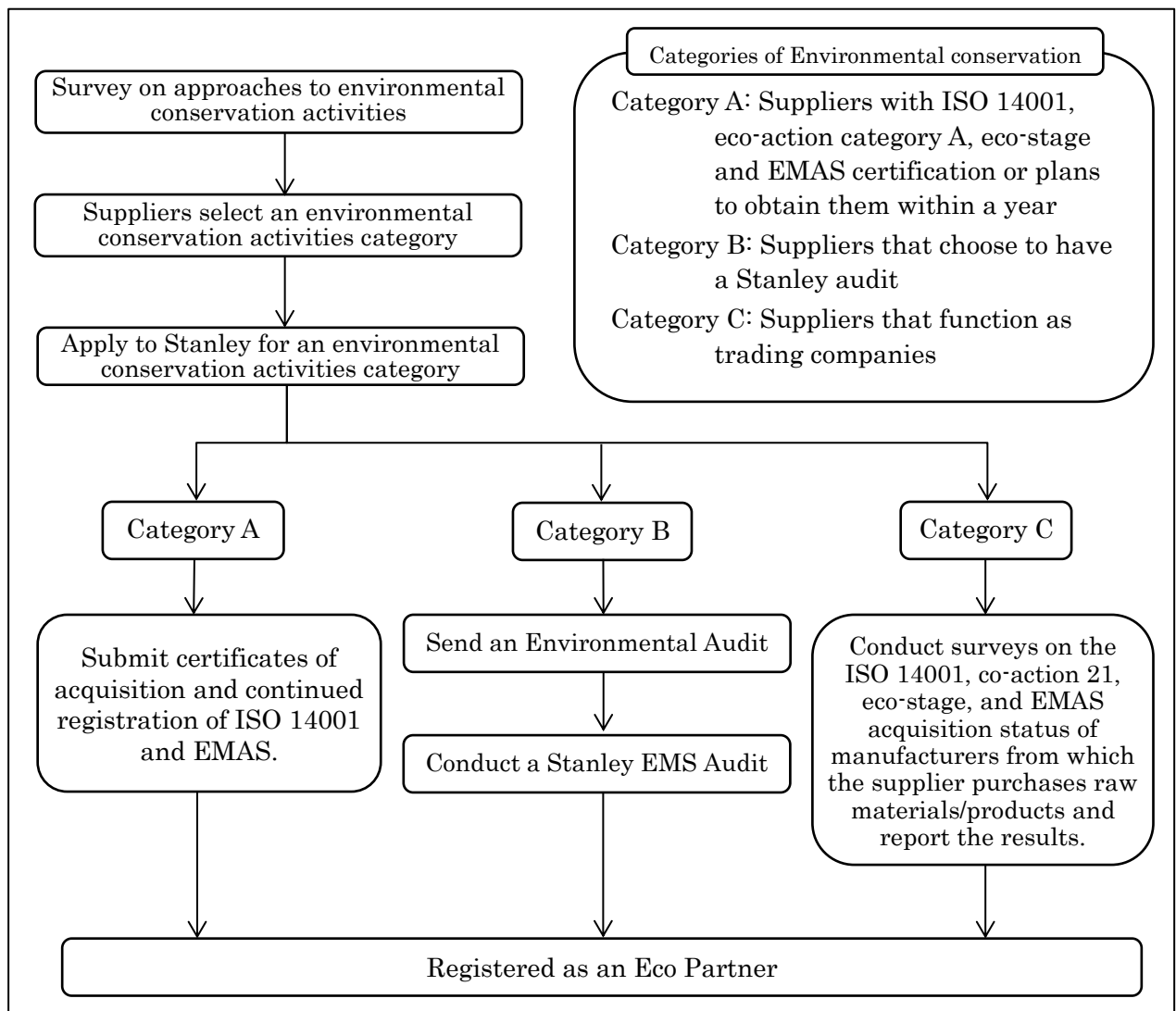
② “Category B”

- Suppliers are requested to undergo an Environmental Management System (EMS) Audit (hereinafter referred to as EMS Audit) conducted by Stanley. The audit date will be decided later based on consultation.
- After consultation, we will send an “Audit Plan.”
- Stanley auditors will visit a customer and conduct an onsite EMS Audit.
- If nonconformity is revealed by the EMS Audit, a Supplier’s Environmental Audit Report will be issued. We ask the supplier to take corrective action and submit a progress report.
- Based on a final judgment, the supplier will be registered as an Eco Partner.

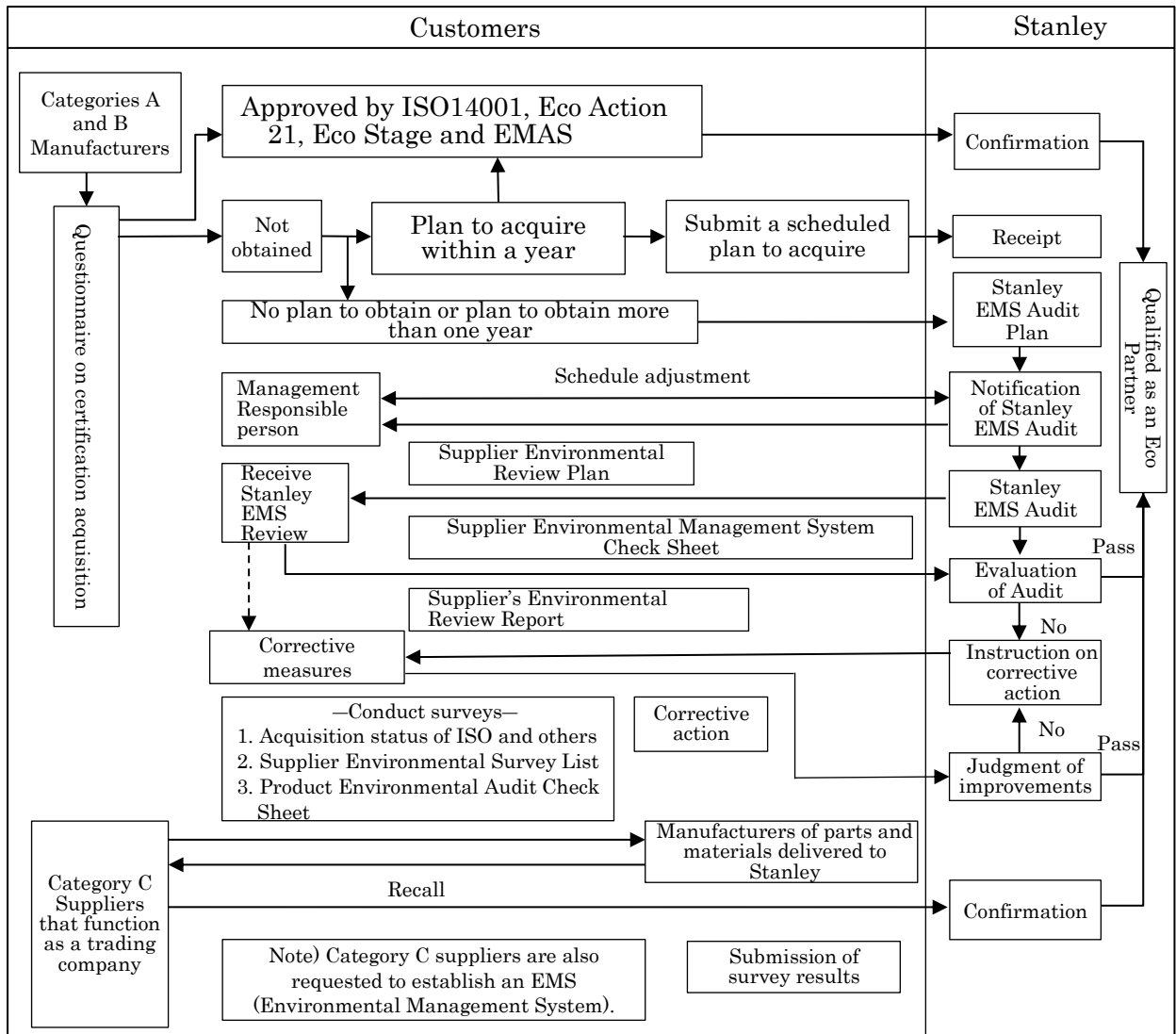
③ “Category C”

- If a supplier is a trading company, the company is requested to conduct a Supplier Environmental Survey and examine the status of Eco Action 21, Eco Stage, and EMAS as well as ISO 14001 certification acquisition of manufacturers from which they purchase deliver parts and materials to Stanley. These results should be submitted to Stanley. Another request is to submit a “Supplier Environmental Survey Sheet” and a “Questionnaire regarding Application Form for Environmental Conservation Activities Category” and an “Acquisition of Approval Certificate.”

《 Fig. 1 Procedure for Selecting an Environmental Conservation Activities Category 》



« Fig. 2 Environmental management system development flow (confirmation of Eco Partner) »



(2) Regarding submission of “Supplier’s Environmental Survey List” and “Questionnaire regarding Application Form for Environmental Conservation Activities Category and Acquisition of Approval Certificate”

Suppliers are requested to evaluate their own approaches in terms of present status of environmental conservation activities according to items of “Supplier’s Environmental Review List” and to submit results of “Questionnaire regarding Application Form for Environmental Conservation Activities Category and Acquisition of Approval Certificate” once a year. (Requests to targeted suppliers)

3) Request to conduct thoroughgoing management of environmentally hazardous substances

(1) Compliance with “Environmental Hazardous Substances Management Standards”

- The chemical substances contained in the raw materials, parts, products (including secondary materials), and packaging materials (hereafter referred to as “goods”) procured by Stanley, as well as the chemical substances used in the manufacturing stage, are managed by being classified as either “Prohibited (with exemptions)” or “Declarable” as indicated in Table 1. “Management classification definitions.” We ask that our suppliers please comply with the requirements listed in these Guidelines and with our Management Criteria for Substances of Environmental Concern (From Annex 1 to Annex5).

- Even if substances are not classified as “Banned,” but if overseas countries and regions to where products are delivered have laws and regulations governing them, those laws shall be observed. (Instruction will be given from each business division.)

《Table 1 Classification of Control Levels》

Control levels	Definition
Banned	Exceeding the threshold regarding containment is banned. If a deadline has been specified, then substances cannot be included in the delivered goods in excess of the threshold values on or after the deadline. Intentional containment shall be reported despite being under the threshold.
Exemptions	For limited application, containment in delivered goods is not banned. Report is required in the exceptional case of concentration exceeding allowable concentration despite intentional containment.
Report required	Report to Stanley is required regarding intentional containment in delivered items. Regarding non-intentional containment of impurities, the report is required if it exceeds allowable concentration.

(2) Construction of Chemical Substances Management System (hereinafter called CMS)

- According to domestic legal regulations and those of other countries as well, management of chemical substances contained in products is required. To support the requirement, each country has to carry out “appropriate and effective management” regarding those substances in products through supply chains. For this reason, suppliers are kindly requested to construct and improve CMS according to “Product Environmental Quality Audit Sheet” specified by Stanley.”
- Progress reports of CMS should be made and be submitted it once a year according to Form 2, “Product Environmental Product Quality Assurance Audit Check Sheet,” with self-evaluation. Suppliers that function as trading companies are requested to evaluate manufacturers of delivered goods according to “Product Environmental Product Quality Assurance Audit Check Sheet” and submit the evaluation results.
- Based upon evaluation results by Stanley and requests from our customers, on-site inspections and audits of manufacturing processes may be required. Suppliers’ cooperation is kindly requested at that time.

(3) Request for inspection and report regarding chemical substances contained in products

- Suppliers are requested to conduct a survey on chemical substances contained in products according to our “Environmentally Hazardous Substances Management Standards” in order to submit survey reports regarding products, parts, materials, packaging materials, etc., delivered to our company. The submission format is based upon “Table 2 Contained Chemical Substances Information Submission Format.” Another format may be used occasionally.
- Input procedures for each format are shown by URLs in Table 2.
- Suppliers are requested to make reports to us immediately when containment of “banned substances” is found in goods already delivered or goods to be delivered to us.

- In some cases, we may share information submitted to Stanley internally within the company and use it to manage substances of environmental concern at our company and to comply with investigations from our customers. In addition, we may also disclose it to third parties as information on Stanley products for the sake of legal compliance.

«Table 2 Contained Chemical Substances Information Submission Format»

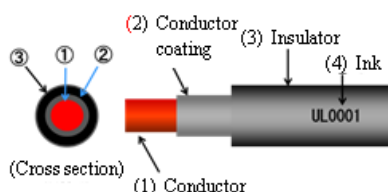
Submission format	Submission standards		Remark
	Substance and compound	Article	
Ⓐ JAMA/JAPI Standard Material Datasheet	○ (Automobile equipment)	○ (Automobile equipment)	http://www.japia.or.jp/
Ⓑ JAMP AIS	—	○ (Electronic equipment)	http://www.jamp-info.com/ais
Ⓒ JAMP MSDSplus	○ (Electronic equipment)	—	http://www.jamp-info.com/msds
Ⓓ Green Procurement Survey Answer Tool (by former JGPSI)	◆ (Electronic equipment)	◆ (Electronic equipment)	http://vt62474.jp/toolv431.html
Ⓔ IMDS	◆ (Automobile equipment)	◆ (Electronic equipment)	http://www.mdsystem.com/ Send IMDS data to Stanley ID (7255) and e-mail to the person in charge of request about the data submission.
Non-containment certificate regarding banned substances	◆	◆	Format 1
Analysis data	◆	◆	Notification of targeted articles and analysis methods will be sent separately.

- : Essential (to be answered by Ⓐ, Ⓑ or Ⓒ) ◆ : Request as needed
 — : No submission required

(4) Calculating included concentrations

- The included concentrations of prohibited chemical substances are to be calculated for each “homogeneous material.” The included concentrations must be at or below the threshold values for each homogenous substance in a product. A specific example of a homogeneous material is shown in Fig. 3.
- The denominator in the concentration calculation is defined as the “Mass of the homogeneous material,” while the numerator is defined as the “Mass of the substance subject to regulation contained in the homogeneous material.” But for metallic compounds, please calculate this by converting this to the weight of just the metallic components.

<Fig. 3. Specific example of a homogeneous material>



[Example for the % of DEHP contained in an insulator]

$$\% \text{ of DEHP contained} = \frac{\text{Amount of DEHP contained}}{\text{Gross mass of (3) Insulator}}$$

(5)

- ① New managed substances such as SVHC are added by amended regulations.
- ② Incorrect, transmitted information regarding contained amount of substances,

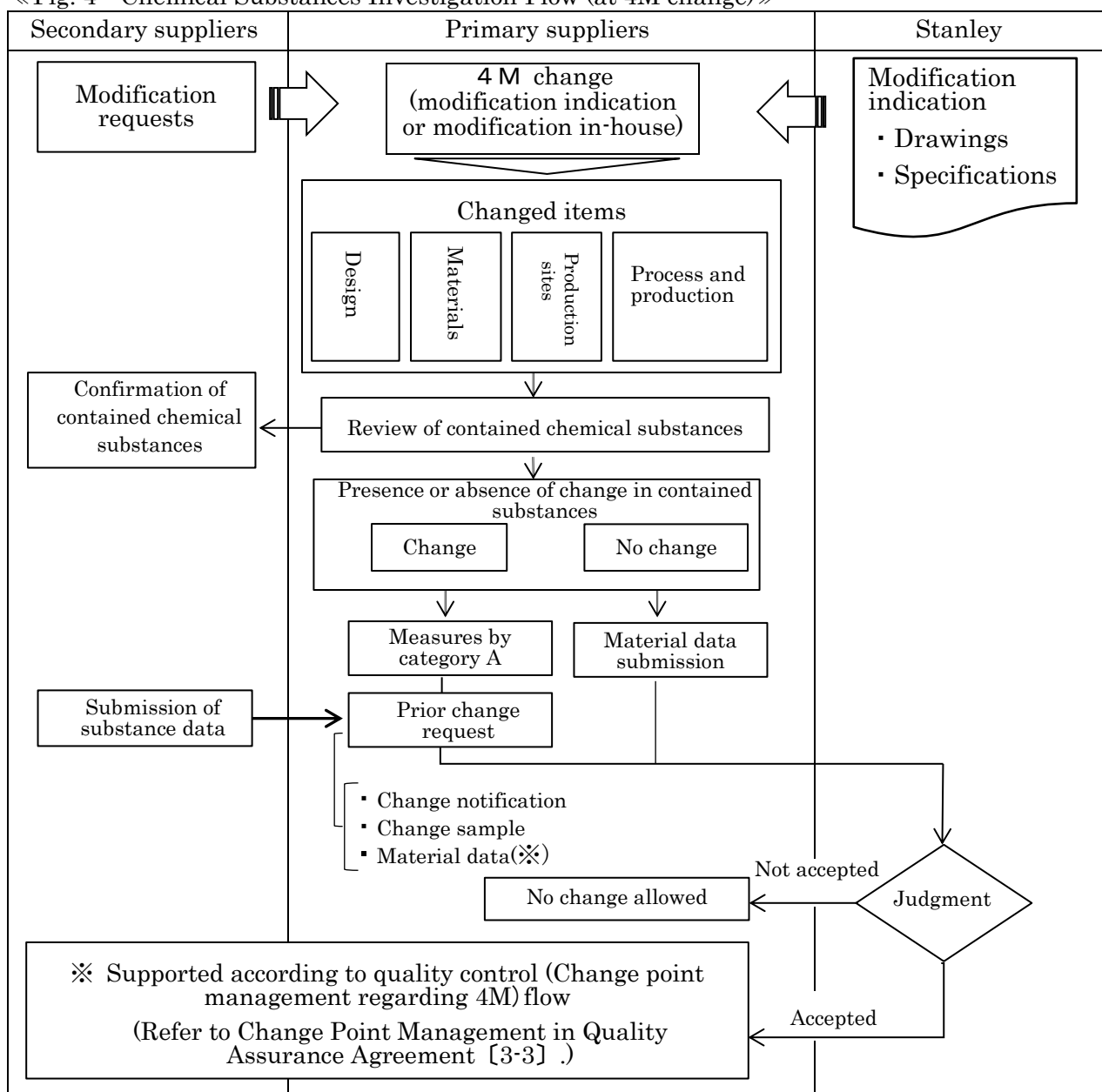
material data, etc. is found.

- ③ Information transmitted from your upstream companies (suppliers) is modified.
- ④ Changes in 4M have taken place. Regardless of management category, regarding changed items that are subject to ① design modification, ② material modification, ③ production site modification and ④ process/production modification, those shall be reviewed or inspected again and material data shall be submitted. If contained substances change, take measures for them according to management category A. [Refer to investigation flow of chemical substances contained in products (at 4M change). Refer to Fig. 3.]

(6) Regarding non-containment certificate of banned substances

- Regardless of control levels, to receive non-containment guarantee regarding “banned substance,” “Non-containment Certificate of Banned Substances” form 1 may have to be submitted.

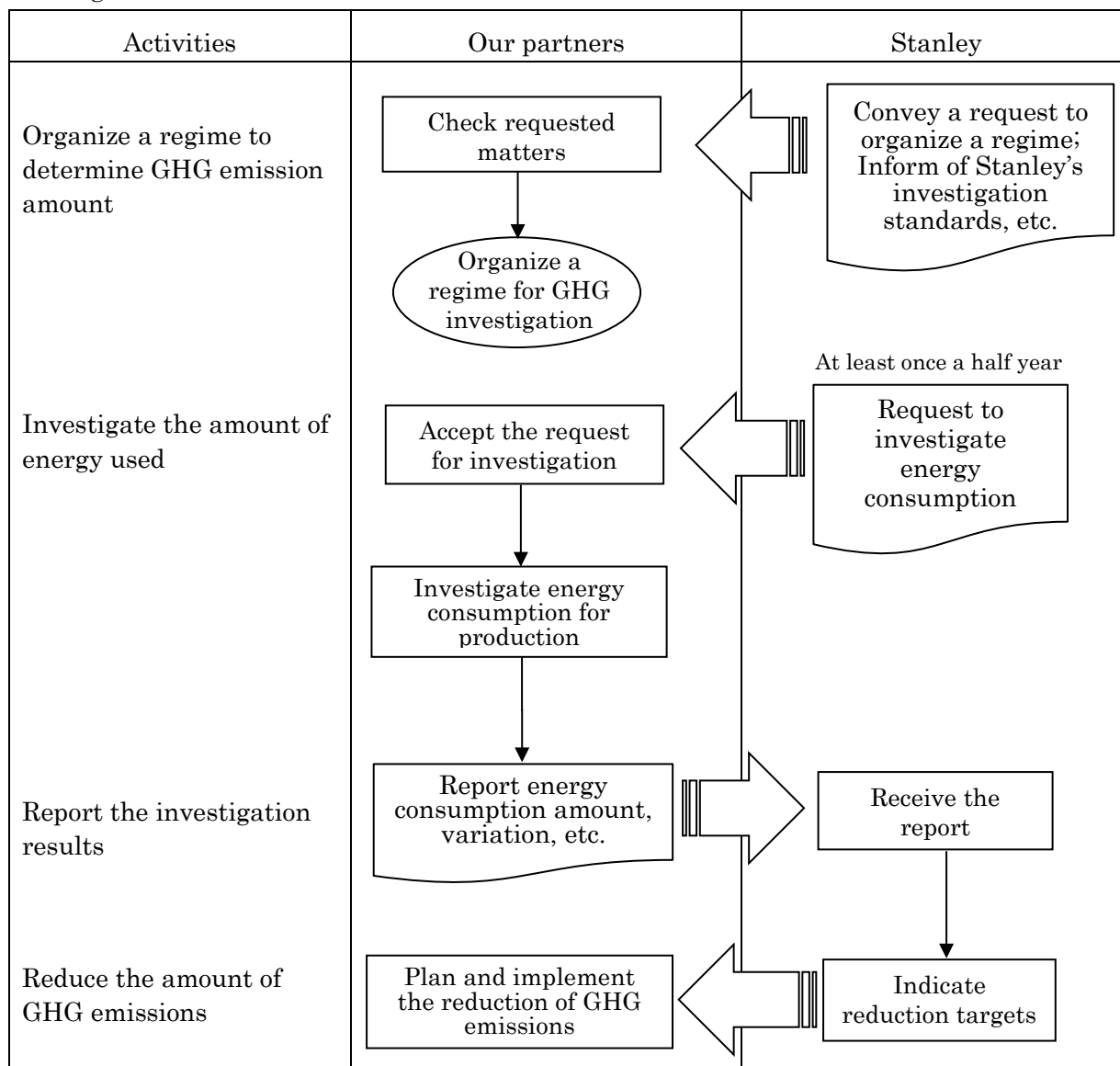
« Fig. 4 Chemical Substances Investigation Flow (at 4M change) »



4) Approach to understand and reduce greenhouse gas emissions (GHG)

Suppliers are requested to determine the amount of GHG emissions firstly and then to engage in activities to reduce GHG emissions. As Stanley will carry out these activities according to the following procedure given in Fig. 4, your cooperation will be greatly appreciated.

« Fig. 5 Flow of Determination and Reduction of GHG Emissions »



(1) Determination of GHG emissions and submission of achievement results
Suppliers are each asked to organize a regime capable of adopting the Stanley-designated method of determining GHG emissions amounts and supplying GHG emissions data to Stanley.

(2) Reduction of GHG emissions amount

Suppliers are each asked to undertake activities to reduce GHG emissions, such as more efficient use of energy. The reduction targets will be shared by suppliers and Stanley through briefing meetings and other opportunities. Suppliers are also asked to present plans and actual results on their GHG emissions reduction efforts. GHG (greenhouse gases) denotes the following six types of gases whose reduction is required in the Kyoto Protocol:

- (① CO₂ (carbon dioxide) ② CH₄ (methane) ③ N₂O (nitrogen monoxide)
④ HFCs (hydrofluorocarbons) ⑤ PFCs (perfluorocarbons) ⑥ SF₆ (sulfur hexafluoride))

5) Request to promote resources recycling

When deciding specifications of our products, our design and development departments may consult with suppliers. Suppliers are kindly requested to propose materials that may contribute to promotion of recycling-oriented production based upon Stanley's philosophy by making best use of resources and adopting such activities. Materials that will contribute to recycling-oriented production are as follows:

- Materials that will contribute to reduction of input materials
- Materials that will contribute to expanding use of recycled resources
- Materials that will contribute to reduction of packaging materials for product transportation

6) Other requests

- (1) Request for submission of data

Submission data in Table 3 is kindly requested to be submitted within a specified time limit. Further, notification of forms to be submitted, regarding ①, ③, ④, ⑥, ⑦, and ⑧ will be sent at the time of submission requests from Stanley.

- (2) Dealing with provided information

We will never disclose the information to outside but share it inside the company.

If it is necessary to disclose provided information, we will take special attention to it.

《Table 3 List of data to be submitted》

Approached items	Data to be submitted	Time to submit					Remarks	
		When managed substances are added	At change of 4M	Individual request	Periodic (once a year)	Periodic (once in three years)		When a new transaction starts
Construction of EMS	① Application Form for Environmental Conservation Activities Category and Acquisition of Approval Certificate				○		○	▪ To be distributed by Stanley when requested to submit
	② Copy of EMS certificate of registration by third party certifying body						○	▪ Suppliers with EMS certificates are targeted.
	③ Supplier EMS check sheet					○	○	▪ Supplies with EMS certificates are targeted. ▪ To be distributed by Stanley when requested to submit
	④ Supplier Environmental Investigation List				○		○	▪ To be distributed by Stanley when requested to submit
	⑤ SDS sheet (Safety Data Sheet)			○				▪ New version based on GHS regulations
Understanding and reduction of CO ₂	⑥ GHG Emissions Achievement Data							▪ To be distributed by Stanley when requested to submit
	⑦ GHG Emissions Reduction and Achievement Data			○				

Approached items	Data to be submitted	Time to submit					Remarks	
		When managed substances are added	At change of JM	Individual request	Periodic (once a year)	Periodic (once in three years)		When new a transaction starts
Thoroughgoing environmental hazardous substances management	⑧ Product Environmental Quality Assurance Audit Check Sheet (Form 2)				○		○	▪ To be distributed by Stanley when requested to submit
	⑨ Data regarding Chemical Substances Contained in Products							▪ Can be obtained from URLs of Table 2 on page 8.
	① JAMA/JAPIA Standard Material Datasheet							
	② JAMP AIS	○	○ (※)	○				
	③ JAMP MSDSplus							
④ JGPSSI								
⑩ Non-containment Certificate regarding Banned Substances (Form 1)				○				
⑪ Analysis data				○				

※ Regardless of management category, when changed items are subject to ① design modification, ② material modification, ③ production site modification and ④ process/production modification

If you have any question, please feel free to contact us.

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Edition 10, June 1, 2017

Edition 9, April 1, 2016

Edition 8, April 1, 2015

Edition 7, September 1, 2013

Edition 6, April 1, 2012

Edition 5, September 1, 2011

Edition 4, September 1, 2010

Edition 3, August 1, 2009

Edition 2, April 1, 2005

Edition 1, April 1, 2000

6. Publication History

① Green Procurement Guidelines

Edition	Date of publication	Revised contents
1	April 1, 2000	<ul style="list-style-type: none"> Newly established
2	April 1, 2005	
3	August 1, 2009	
4	September 1, 2010	<ul style="list-style-type: none"> Addition of forms Content modification of environmental conservation activities
5	September 1, 2011	
6	April 1, 2012	<ul style="list-style-type: none"> Addition of “Understanding and reduction of GHG emissions”
7	September 1, 2013	<ul style="list-style-type: none"> Review of “Basic environmental philosophy” and “Environmental policy”
8	April 1, 2015	<ul style="list-style-type: none"> Combined with former “Green Procurement Guidelines Appendices” Annex 1, Form 1 and Form 2 are added. Definition of terminology is added. ”Name of Rank Category and Definition of Category” is modified. Modification and addition regarding contents related to “Submission Form for Information regarding Chemical Substances Contained in Products” Addition of “3) Regarding information management at change point” Modification of “Non-containment regarding banned substances” Addition of “Fig. 3. Chemical Substances Investigation Flow (at 4M change)” Addition of “Request to promote resources recycling” Addition of “Table 3 List of data to be submitted” Updating of “Environmentally Hazardous Substances Standards” Deletion of SVHC list Addition of revision history, and other items
9	April 1, 2016	<ul style="list-style-type: none"> Revised the Management Criteria for Substances of Environmental Concern (Annexes 1 – 5) Reviewed the definitions for the management classifications in Table 1 Entry added on handling information on chemical substances contained in products Entry added on calculating included concentrations Revised “Form 1. Certificate of the Non-Inclusion of Prohibited Substances”
10	June 1, 2017	<ul style="list-style-type: none"> Revisions to our Management Criteria for Substances of Environmental Concern (Annexes 1, 2, 4, and 5-2) Revised “Form 1. Certificate of the Non-Inclusion of Prohibited Substances”