

MinebeaMitsumi Group Green Procurement Standard

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MinebeaMitsumi Inc.

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MinebeaMitsumi Group Green Procurement Standard Attachment

- I Prohibited substances
- II Substances scheduled to be prohibited
- III Prohibited substances requested by customer
- IV Declarable Substances

Forms of Documents required for Submission

- Form 1. Certificate of Non-Use of prohibited Substance
- Form 2. Survey Report of Chemical Substance in Products
- Form 3. Component Sheet
- Form 4. Report of Analysis Results
- Form 5. SVHC survey form for REACH regulation

1. Objective

This Standard aims to specify “prohibited substances”, “information communication”, “request for survey to Supplier” and “operation” for chemical substances contained in raw materials, parts, components, packing/packaging materials and indirect materials that MinebeaMitsumi Group procures, and to comply with legal regulations, customer requirements and industrial standards.

2. Scope of Application

This Standard shall apply to parts, materials and others that MinebeaMitsumi Group procures.

- (1) Raw materials (e.g. steel, plastic pellet) and goods processed using such raw materials.
- (2) Parts, components (e.g. electric and electronic parts, mechanical parts, semiconductor devices, printed circuit boards)
- (3) Packing/packaging materials (refer to requirements in the 7th chapter regarding Packing/packaging materials used by Supplier to transport/protect parts and materials when they are delivered to MinebeaMitsumi Group.)
- (4) Accessories, service parts and instruction manuals
- (5) Indirect materials (e.g. adhesive tapes, soldering materials, adhesives, paints, varnishes, anti-rust oil, grease, impregnated oil)
- (6) Products specified by MinebeaMitsumi Group other than those above

3. Requirements for Chemical Substances Management

3-1.

MinebeaMitsumi Group’s green procurement activities shall control chemical substances contained in parts and materials according to this Standard.

With regard to implementation, in principle, Supplier and MinebeaMitsumi Group shall conclude Basic Transaction Agreement (and supplemental agreements if necessary) and exchange a purchase specification (or at least specification document equivalent to it).

MinebeaMitsumi Group’s suppliers shall comply with this Standard.

3-2.

This Standard is prepared based on domestic and international related laws and regulations, customer requirements and industry standards, but it is not exhaustive. Therefore, MinebeaMitsumi may ask Supplier to comply with chemical regulations not specified in this Standard, and regulation value that is stricter than what is specified in this Standard by domestic and international legal regulations, customer requirements and others.

3-3. The Management of Chemical Substances in Products

Basically, the parts and others delivered to MinebeaMitsumi Group shall be properly manufactured under management of chemical substances in products. MinebeaMitsumi Group asks Supplier to establish and operate management system for chemical substances in products. Following managements are recommended to establish and operate:

- 1) Management System for Chemical Substance in Products (JIS Z 7201: Management of chemical substances in products - Principles and guidelines)
- 2) Quality Management System (ISO 9001 etc.)
- 3) Environment Management System (ISO 14001)

MinebeaMitsumi Group shall audit its Supplier (paper audit or site audit) as necessary, to confirm Supplier’s implementation status of management of chemical substances in products. These are audited based on ‘Guidelines for the management of chemical substances in products’ and its check sheet which JAMP offered and which was prepared in reference to ‘JIS Z 7201: Management of chemical substances in products-Principles and guidelines’.

3-4. Avoiding Contamination

Take appropriate measures to prevent contamination by mixture, contact or others throughout the production processes of parts and materials (e.g. reactions, synthesis, joining, mixing, molding, and assembly). Likewise, take necessary measures to prevent the contamination from molds, tools, machinery and equipment as well as indirect materials.

In principle, Supplier must not manufacture products and/or materials which contain prohibited chemical substances and those which do not contain them in the same building. If Supplier has difficulty in this matter, MinebeaMitsumi Group will discuss the matter. Packing/Packaging material which contacts directly with Supplier’s product shall not contain phthalate (DEHP, DBP, BBP, and DIBP) greater than 1,000ppm in each homogenous material because it is concerned that phthalate migrates onto that product due to contact. MinebeaMitsumi Group may ask Supplier to submit analysis data and other necessary information.

3-5. Prohibit on the Use of Recycled Plastics

Supplier is prohibited from supplying MinebeaMitsumi Group with parts and materials that plastic materials sold as recycled materials are used partially or entirely. However, using regrind (see note) generated in Supplier's production processes is permitted to the extent that it does not exceed the limit specified by the UL standard or MinebeaMitsumi Group. If supplier uses regrind materials in accordance with the UL standard, inform MinebeaMitsumi Group to that effect before starting production. Supplier shall control granulating and grinding equipment, and materials appropriately not to being mixed and contaminated.

Note: Regrind materials are ground or granulated plastic waste materials such as runners, sprues and non-contaminated rejected parts that are produced in Supplier's production processes to be recycled.

3-6. Control of Changes

Changes shall be controlled by MinebeaMitsumi Group's operation rule of quality management, but the documents required for reporting changes vary depending on the types of change related to chemical substances in products. Therefore, Supplier shall contact MinebeaMitsumi Group's purchasing department and receive approval before changing something (e.g. 4M). Regarding management of chemical substances in products, it is mandatory that Supplier receives approval by MinebeaMitsumi, when Supplier changes its Supplier, materials (including indirect materials), manufacturing subcontractor, production factories, and country of production.

3-7. Occurrence of Abnormalities or Non-conformance

- (1) In the event that any abnormality or non-conformance occurs with regard to the control of chemical substances in products at Supplier or Supplier's supplier (including minor cases), immediately contact the MinebeaMitsumi department that has placed an order with Supplier.
- (2) In the event that any abnormality or non-conformance occurs with regard to the control of chemical substances in products during incoming inspection at MinebeaMitsumi Group or its customer (including minor cases), provide data and information to MinebeaMitsumi Group to investigate and verify and, if necessary, take all necessary corrective measures from investigation of the causes to prevention of reoccurrence.

4. Definition of Terms

4-1. Inclusion

Chemical substances remain on products, parts and others by addition, filling, mixture and adhesion. It does not matter whether chemical substances are included intentionally or unintentionally.

4-2. Impurities

Chemical substances that are contained in natural materials and cannot technically be removed by the refining process of the material for industrial use, or chemical substances that are generated in refining or synthesis processes and cannot technically be removed.

4-3. Intentionally added

A situation where chemical substances are added on products, parts and others in order to provide a specific characteristic, appearance, property and quality. However, only if the chemical substances remain in products, parts, and others, "intentionally added" makes sense. "Impurities" is not treated as "Intentionally added".

4-4. MinebeaMitsumi Group regulation value

Limit values which MinebeaMitsumi Group sets to meet requirements of domestic and international related laws and regulations, our customers, and industry standards.

4-5. 4M Changes

Change(s) made on Man, Machine, Material or Method in the condition of the manufacturing process.

4-6. Homogeneous material

A material that is made up of uniform composition and cannot be mechanically disassembled into different materials such as unscrewing, cutting, crushing, grinding and abrasive processes.

Examples of homogeneous materials: plastics, ceramics, glass, metals, alloys, paper, board, resins, plating, and coatings.

4-7. Certificate of Non-Use of prohibited Substance

A document that certifies that Supplier does not intentionally add prohibited substances and that the concentration levels of chemical substances do not exceed MinebeaMitsumi Group regulation value.

4-8. Report of Analysis Results

A document that clarifies the region on which analysis was performed in analysis data by relating with structure drawings and charts of material composition.

4-9. Analysis data

A report of analysis data issued by an analysis laboratory.

4-10. ISO/IEC 17025 certified body

An analysis laboratory that is certified to meet "ISO/IEC 17025 general requirements for the competence of testing and calibration laboratories" by a third party certification body.

4-11. IEC 62321

A standard for "Determination of certain substances in electrotechnical products" that IEC (International Electrotechnical Commission) sets.

4-12. REACH Regulation

Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorization and Restriction of Chemicals.

4-13. SVHC (Substances of Very High Concern)

Chemical substances identified through the procedure specified in Article 59 of the REACH Regulation as well as those that meet the criteria specified in Article 57 of the REACH Regulation.

4-14. JAMP

The Joint Article Management Promotion-consortium.

4-15. JAMP Guidelines for the management of chemical substances in products

Guidelines for the management of chemical substances in products (including their checklist) JAMP publishes. The Guidelines are drawn up according as Japan Industrial Standards "JIS Z 7201: Management of chemical substances in products - Principles and guidelines".

4-16. JAMP chemSHERPA AI

A Data sheet JAMP provides to communicate and disclose information on chemical substances in articles. Information such as "name of law/regulation", "whether declarable substances are included or not", "name of declarable substances", "CAS Number of declarable substances", "concentration of declarable substances" is put in it. It is used within supply chain.

4-17. JAMP chemSHERPA CI

A Data sheet JAMP provides to communicate and disclose information on chemical substances contained in chemical product and mixture. Information such as "name of law/regulation", "whether declarable substances are included or not", "name of declarable substances", "CAS Number of declarable substances", "concentration of declarable substances" is put in it. It may be used together with SDS.

4-18. JAMP AIS

A Data sheet that JAMP provides to communicate and disclose information on chemical substances contained in articles and that corresponds to chemSHERPA AI. JAMP will quit providing it in July, 2018.

4-19. JAMP MSDSplus

A Data sheet that JAMP provides to communicate and disclose information on chemical substances contained in chemical product and that corresponds to chemSHERPA CI. JAMP will quit providing it in July, 2018.

4-20. CAS Number

Unique numerical identifiers for chemical substances assigned by the Chemical Abstracts Service (CAS) for its chemical substance registry system.

4-21. SDS

Safety Data Sheet. It was called MSDS before.

4-22. Mill test report

A document certifying the properties of steel materials.

5. Materials Requested to be Submitted

MinebeaMitsumi Group asks Supplier to submit the materials listed below when selecting and inspecting parts, materials, indirect materials and packing materials to be newly purchased by the related Business Unit or Overseas Factory of the MinebeaMitsumi Group. MinebeaMitsumi Group shall confirm that the products comply with laws/regulations and fulfill customer requirements based on the various reports, certificates, and other data submitted by the supplier.

5-1. Certificate of Non-Use of prohibited Substance

Certificate of Non-Use of prohibited Substance (hereinafter called Non-Use Certificate) warrants that Supplier does not use 'prohibited substances' and 'prohibited substances required by customer' and that such substances do not exceed laws and regulations values or MinebeaMitsumi Group regulation value. Complete and submit Non-Use Certificate List, when reporting on multiple parts and materials.

5-2. Analysis data

Submit analysis data of each homogeneous material of all parts for the 6 prohibited substances by the EU RoHS Directive.

In addition, from July 22, 2019, 4 types of phthalate (DEHP, DBP, BBP and DIBP) are added to the prohibited substances of the EU RoHS Directive, so submit analysis data for 4 types of phthalate from January 2018.

In case that Supplier has difficulty in frequency of submission, specified analysis methods, and specified analysis laboratories described below, contact the MinebeaMitsumi Group department that has placed an order with Supplier. MinebeaMitsumi Group will discuss the matter.

Table 1: Applicable Regions and Analysis Items for Analysis Report for Each Homogeneous Material

(√: applicable, -: exempt)

Analysis Items Applicable regions of parts and materials	Cd	Pb	Cr ⁶⁺	Hg	PBB	PBDE	Phthalate
Plastic resin (including rubber), ink, pigments, dyes, paints, grease, oil, adhesives etc.	√	√	√	√	√	√	√
Metals, metal alloys, plating, ceramics, glass etc.	√	√	√	√	-	-	-

Notice:

- (1) The effective period of Analysis data is one year from the date of measurement. MinebeaMitsumi Group asks Supplier to provide annual updates.
- (2) Language of analysis data
Analysis Data shall be written in English or Japanese. However, when submitting analysis data in Japanese, Supplier may be asked to provide a separate English translation.
- (3) Items that must be entered in analysis data
Enter the following items in the analysis data:
 - 1) Sample name (to be defined so that it can be related with the submitted data for each homogeneous material)
 - 2) Pretreatment method: official method name, or name of the method if different from the official method
 - 3) Measurement method: measurement method name or official method name
 - 4) Name of analysis laboratory, corporate seal
 - 5) Names and signatures of a responsible person and a person who measured at the analysis laboratory
 - 6) Date of issue, date of measurement
 - 7) Measurement results (if N.D., or not detectable, enter lower limit of quantification)
 - 8) Analysis flowchart: a document that indicates the flow of analysis, such as sampling, pretreatment and measurement operations. Use Report of Analysis Result, Sample Analysis Flow Chart, as a reference when preparing an analysis flowchart.
 - 9) If providing pretreatment of dissolving, note that the sample was completely dissolved (this can be recorded on the analysis flowchart).
 - 10) Picture of sample (The picture must be clear enough to enable identification of the sample and the areas measured.)

(4) Designation of analysis laboratory and analysis method

Analysis method for substances specified in the EU RoHS Directive must be in compliance with the latest version of IEC 62321 and must be precision analysis method described below. Ask the ISO/IEC17025 certified laboratory to analyze substances by this method described below. An analysis laboratory or method may be designated in order to meet our customer's requirements. MinebeaMitsumi Group will request individually as needed.

Screening analysis by XRF is not permitted as analysis data for submission.

In case of adhesives, paints, ink and others, report the results of analysis under dry condition (condition that they are in MinebeaMitsumi Group's product).

<Precision analysis method>

- 1) Cadmium (Cd), Lead (Pb), and Mercury (Hg): ICP-AES, ICP-MS, or AAS
- 2) Hexavalent chrome: UV-Vis (Ultraviolet-visible spectroscopy)
- 3) PBB, and PBDE: GC/MS (Gas Chromatography Mass Spectrometry)
- 4) Phthalate: GC/MS (Gas Chromatography Mass Spectrometry)

(5) Requests for submitting analysis data other than RoHS Directive

If requested by MinebeaMitsumi's customers, Supplier may be asked to submit analysis reports for substances other than RoHS Directive. MinebeaMitsumi Group will request individually as needed.

Example: halogen, antimony, beryllium, etc.

5-3. Report of Analysis Results

Report of Analysis Results is the collating table which relates parts and regions to analysis data. In case that MinebeaMitsumi Group cannot accurately identify the regions of parts with only Report of Analysis Results because the structure is complicated, submit the form of structural drawing and chart of material composition, too. The form of structural drawing and chart of material composition is at Supplier's discretion. The effective period of Report of Analysis Results is one year from the date of measurement in common with analysis data.

5-4. Survey Report of Chemical Substance in Products

(1) chemSHERPA:

MinebeaMitsumi Group designates chemSHERPA as a standard survey sheet format for chemical substances in products.

<Format to be submitted>

Articles: chemSHERPA AI (extension: shai)

Chemicals or mixture: chemSHERPA CI (extension: shci)

Note: Confirm how to use the above formats, referring to instruction manuals JAMP publishes.

*JAMP chemSHERPA Official site: <https://chemsherpa.net/chemSHERPA/english/>

(2) Survey Report of Chemical Substance in Products:

This survey format is used when Supplier discloses all of chemical substances in products upon MinebeaMitsumi Group's request. In this case, chemical substances described in 'MinebeaMitsumi Group Green Procurement Standard Attachment ' are subject to information disclosure. If Supplier could not disclose all of chemical substances in Supplier's products, consult with MinebeaMitsumi Group.

(3) IMDS, JAMA/JAPIA Standard Material Datasheet:

Regarding automobile-related parts, Supplier may be asked to register chemical data in IMDS or to submit JAMA/JAPIA Standard Material Datasheet. MinebeaMitsumi Group will request individually as needed.

5-5. Other materials

Supplier may be asked to submit materials below, due to requirement from MinebeaMitsumi Group's customer or application of products.

(1) SDS

(2) Mill test report (Inspection Certificate)

(3) Component Sheet

If a component is multiple and composed of several kinds of part, prepare and submit a component sheet, relating the SDS, Mill test report, and other report data with the composing region names and data numbers using forms which are provided by Supplier or MinebeaMitsumi.

(4) Other materials required by MinebeaMitsumi Group

5-6. Important reminder for materials to be submitted

- (1) Use Excel or Word as the electronic file form for submitting Survey Report of Chemical Substance in Products and Report of Analysis Results.
- (2) When submitting copies of the Non-Use Certificate, Non-Use Certificate Lists, Analysis Reports, SDSs or Mill test report, use Adobe Acrobat PDF.
- (3) The information that Supplier provide may be disclosed, in whole or in part, in MinebeaMitsumi Group's responses to its customer requests. With regard to any Supplier's trade secret information, contact the MinebeaMitsumi department that has placed an order with Supplier for individual consultation.
- (4) Various MinebeaMitsumi Group's business units may request Supplier to survey the same parts and materials. Submit Supplier's data to each individual business unit.

6. Prohibited substances and Declarable substances

MinebeaMitsumi Group defines Prohibited substances and Declarable substances and describes them in the MinebeaMitsumi Group Green Procurement Standard - Attachment (hereinafter referred to as the Attachment). MinebeaMitsumi Group requires Supplier to prohibit the use of certain chemical substances (e.g. cleaning agent, mold release agent, anti-rust oil) in their manufacturing processes even when the products do not contain the chemical substances subject to prohibition. If regulation values for a chemical substance are specified in this Standard, the chemical substance must not be included in excess of the specified values, even if the chemical substances are unintentionally contained in products, such as impurities.

6-1. Prohibited substances

Prohibited substances are prohibited or restricted by relevant domestic and international laws and regulations or international treaties, and they are chemical substances that may be contained in our products.

6-2. Substances scheduled to be prohibited

Chemical substances that have an expiration date by relevant law, regulation and international treaties and agreements. They must not be contained in products greater than threshold after an expiration date and are treated as prohibited substances from the date. And Supplier may be prohibited from using these substances before an expiration date if MinebeaMitsumi Group's customer requires. MinebeaMitsumi Group's relevant business unit will request as needed.

6-3. Prohibited substances required by customer

Chemical substances that are prohibited from being used in certain products by certain customers' requirements or industry standards. Warrant that the regulation values are met, in case that Certificate of Non-Use of prohibited Chemical Substances and other request form describe that using these chemical substances is prohibited.

6-4. Declarable substances

Substances that are required to communicate information by laws and regulations and/or industry standards, and to collect and provide information by Supplier and through supply chain.

Notice: Provide MinebeaMitsumi Group with information about SVHC set forth in REACH Regulation in accordance with the following procedure.

- (1) New SVHCs are added to the candidate list by European Chemicals Agency (ECHA), as needed. Supplier shall obtain the latest candidate list of SVHC on the ECHA official website and control them.
- (2) When SVHCs are newly added to the candidate list from now on, the SVHCs are subject to Declarable Substances at the time. Therefore, Supplier shall establish a system to provide information about SVHC immediately, when SVHCs are newly added to the candidate list.

7. Packing/packaging material used for delivering Supplier's products to MinebeaMitsumi Group

Regarding packing and packaging material used for delivering Supplier's products to MinebeaMitsumi Group, Supplier need not submit Non-Use Certificate and others, but Supplier shall comply with the following items to smoothly recycle packing and packaging material and to smoothly dispose of waste within MinebeaMitsumi Group:

- (1) Heavy metals as cadmium, lead, hexavalent chromium and mercury shall be less than 100 ppm in total.
- (2) Using plastic tapes, staples, foam polystyrene, and PVC packaging/packing materials may be restricted.

8. Obtaining up-to-date information

Latest materials such as this Standard, documents and formats regarding MinebeaMitsumi Green Procurement are put on the MinebeaMitsumi website. Download the latest materials on the website.

URL: <http://www.minebeamitsumi.com/english/corp/company/procurements/green/index.html>

Revision history

Revision	Revised date	Revised contents
The 6th	February. 01, 2018	Completely revised Not changed: forms for Supplier to submit