

NTN Group
Green Procurement Standards
5th Edition

Revised on April 1st, 2018

NTN Corporation

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<Attachment>

- 1 Request for building environmentally hazardous substance control system
- 2 Reporting of no ELV/RoHS 10 substances contained in products to be supplied
- 3 Conducting analysis of ELV/RoHS 10 substances and preparing evidences
- 4 NTN environmentally hazardous substances list

<Form>

- 1 Confirmation sheet for environmental management system
- 2 Check sheet for environmentally hazardous substance control system
- 3 Non-inclusion certification of NTN-prohibited substances
- 4 List of ELV/RoHS 6 substance evidences
- 5 Declaration of containing of NTN-prohibited substances/observation-requisite substances
- 6 Green Procurement Standards Agreement and Company Information Registration Statement

1 Introduction

Pursuing harmony with the global environment as a mission of greatest importance, we, at the NTN Group, persevere in our efforts aiming at earth-friendly business activities.

Although NTN products including bearings and constant-velocity joints have been originally positioned as “environmentally-friendly (eco-friendly)” goods, which may reduce energy loss due to friction, we, not satisfied with status quo, still earnestly work on the research and development for further enhancement of our products to make a more enormous contribution to a worldwide growing tendency toward energy saving.

Furthermore, we continuously improve the environmental management system in accordance with ISO 14001 to reduce environmental loading, and also ask our suppliers to promote business management taking environmental preservation into consideration, as well as to obtain a certificate of compliance with ISO 14001, Eco Stage, or the like from an accredited third party. We help our suppliers obtain the certification of Eco Stage through NTN Technical Service, one of our subsidiary companies, if they desire to do so.

Against this background, as management of environmentally hazardous substances has become increasingly important, as part of global environmental loading reduction, we are proactively advancing with firm steps toward the accomplishment of the first-and-foremost subjects for our green procurement activities: 1) reduction of environmentally hazardous substances contained in NTN products; 2) reduction of environmentally hazardous substances used in the manufacturing process; 3) introduction of the production facilities or technologies capable of reducing environmentally hazardous substances. In recent years, regulations on environmentally hazardous substances, which began in EU, have become global standards, and an increasing number of countries has enforced similar laws and regulations, while requests from customers have also become more complicated, and thus not only we at NTN but also our suppliers are required to strictly manage environmentally hazardous substances throughout a supply chain.

We hope that you, our suppliers, sufficiently understand the importance of these activities and recognize the observance of the provisions of the Standards is a prerequisite for doing business with you and that you aggressively cooperate with our green procurement program.

2 NTN Environmental Policy

We have established our Environmental Policy as described below and work on environmental preservation across all the business areas including procurement accordingly.

■ NTN Environmental Policy ■

Maintaining harmony with the global environment is our most important challenge. The NTN Group has identified pollution control and preservation of our natural capital as priorities of our business operations. Furthermore, we remain committed to developing technologies that contribute to the emergence of a sustainable society in harmony with nature.

1. Developing technology that contributes to prevention of global warming
By developing technologies and innovative products that contribute to energy efficiency and alternative energy generation worldwide, the NTN Group will contribute to the prevention of global warming.
2. Observance of laws and regulations
The NTN Group will observe all relevant environmental laws, regulations, and ordinances. Moreover, we will proactively take steps to comply with requests from our customers, local communities, and other stakeholders.
3. Reducing the environmental impacts of our business operations
The NTN Group remains dedicated to minimizing the environmental impacts of our emissions of CO₂ and restricted substances across all our business operations. We will endeavor to identify and reduce our environmental impacts in both the upstream and downstream (from supplier to customer) branches of our supply chain.
4. Utilizing resources sustainably
The NTN Group will strive to reduce waste as well as our inputs of water, raw materials, and other resources by remaining focused on reducing, reusing, and recycling.
5. Stringently controlling environmentally hazardous substances
The NTN Group will practice green procurement and conduct stringent management of any environmentally hazardous substances used in our products and processes. We remain focused on adopting benign substitutes for any highly hazardous chemical substances we use in our operations.
6. Conserving biodiversity
In cooperation with local communities, the NTN Group will proactively implement forest preservation, biodiversity conservation, and other environmental protection initiatives.
7. Maintaining open communication
In implementing this Environmental Policy, the NTN Group will seek to improve the environmental awareness of all our employees. In addition, we will widely disseminate information on our environmental initiatives and actively promote open communication with the general public.
8. Continuously improving our Environmental Management System
The NTN Group will implement and continuously improve our Environmental Management System in order to enhance our environmental performance.

3 Objectives

NTN accelerates green procurement through our supply chain under partnership with our suppliers to reduce environmental loading associated with NTN products and business activities and provide our customers with the environmentally-friendly goods in order to fulfill social responsibility imposed on us, a business entity.

4 Concept of Green Procurement

We preferentially deal with suppliers having both good “compliance with environmental laws and regulations, environmental protection efforts (obtaining environmental certificates including ISO 14001, etc. and implementation of environmental management)” and good “environmental qualities of delivery products (not containing hazardous substances, etc.)”.

5 Scope

5.1 Intended suppliers

- The suppliers, who supply materials (parts, materials, sub-materials, process materials, packing/packaging materials and production facility) to be incorporated into NTN products, as well as used in the manufacturing process.
- The contractors, who provide NTN with services such as assembly of parts and other various kinds of operations (forging, cutting, grinding, heat treatment, surface treatment, and so on).

5.2 Target items to be supplied to NTN

All the items to be supplied to NTN for incorporation into NTN products, as well as use in the manufacturing process.

Table 1 Concrete example of the items to be supplied to NTN

Category	Description	Concrete example
Parts/materials	Parts/materials, semi-finished items, finished items, grease, etc. incorporated into NTN products.	Steel materials, workpieces, resin materials/parts, rubber materials/parts, adhesive materials, grease, solder, surface treatment (plating, etc.), sensors, printed circuit boards, motors, etc.
Sub-materials*	Rust-preventive oil, paint, ink, permanent markers, etc. to be possibly coated/used on the NTN products before shipping.	Rust-preventive oil, paint, tape, labels, ink, permanent markers, materials to be used for production, etc. to be possibly coated/used on NTN products.
Materials for production	Oil solutions, grinding stones, etc. used in your production (among which are not coated/used on NTN products at the time of shipment)	Heat treatment oil, machining oil (for cutting or grinding), washing agents, solvents, intermediate rust-preventive oils, grinding stones, etc.
Packing/packaging materials	Materials used for packaging parts and materials, etc., at the time of arrival, and materials packaging NTN product at the time of shipment	Corrugated fiberboards, plastic boxes, trays, plastic bags, buffer materials, pallets, wooden frames, tape, binding materials, labels, printing ink, etc.

* The sub-materials to be used by the suppliers shall be managed assuming that they are classified into parts.

5.3 Compliance obligation of procured items

Confirm the table below for the details to be complied with as they vary depending on the category of the procured items.

Table 2 Compliance obligation of procured items

Procured item Category	Compliance items	7.1 Promotion of business management taking environmental preservation into account					7.2 Control of environmentally hazardous substances and information provision										7.3 Other documents to be submitted
		7.1.1 Compliance with environmental laws and regulations	7.1.2 Building up of Environmental Management System (certification acquisition from the authorized third party)	7.1.3 Recognition/reduction of CO2 emissions	7.1.4 Activities for biodiversity preservation	7.1.5 Promotion of water risk management	7.2.1 Compliance with control criteria for NTN environmentally hazardous substances	7.2.2 Provision of information on environmentally hazardous substances contained and their composition	7.2.3 Request for building environmentally hazardous substance control system (Attachment 1)	7.2.4 Prohibition of inclusion of NTN-prohibited substances and submission of non-inclusion certificate	7.2.5 Description of confirmation results of non-inclusion of ELV/RoHS 10 substances			7.2.6 Declaration of containing of NTN-prohibited substances/observation-require substance	7.2.7 Actions taken when detecting ELV/RoHS 10 substances in sampling analysis		
											(Requirement of evidence)						
											Lead, mercury, cadmium, hexavalent chromium	PBB, PBDE	Four types of phthalic acid esters				
Raw materials	Steel material	○	○	○	○	○	○	○	○	○	○	/	/	○	○	○	
	Resin, etc.*1	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	
	Other	○	○	○	○	○	○	○	○	○	○	○	/	○	○	○	
Parts	Resin, etc.*1	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	
	Other	○	○	○	○	○	○	○	○	○	○	○	/	○	○	○	
Processing		○	○	○	○	○	△	△	△	△	△	△	/	○	△	○	
Sub materials	Resin, etc.*1	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	
	Other	○	○	○	○	○	○	○	○	○	○	○	/	○	○	○	
Manufacturing process materials	In contact with product	○	○	○	○	○	/	○	○	○	○	○	○	▲	○	○	
	Not in contact with product	○	○	○	○	○	/	○	○	○	/	/	/	▲	○	○	
Equipment Jigs	In contact with product	Resin, etc.*1	○	○	○	○	○	/	○	○	○	○	○	○	▲	○	○
		Other	○	○	○	○	○	/	○	○	○	/	/	/	▲	○	○
	Not in contact with product	○	○	○	○	○	/	○	/	/	/	/	/	/	/	○	○
Packaging materials	Resin, rubber	○	○	○	○	○	/	○	○	○	○	/	○	▲	▲	○	○
	Other	○	○	○	○	○	/	○	○	○	○	/	/	▲	▲	○	○
Research and development application	Possibility of being provided by customers	Yes	○	○	○	○	○	○	○	○	○	/	/	/	○	○	○
		No	○	○	○	○	○	/	○	/	/	/	/	/	/	○	○
Other		○	○	○	○	○	/	/	/	/	/	/	/	/	/	○	○

*1 Resin, rubber, adhesive/binder, paint, coating, etc.

[Applicability]

- : Applicable
- : Applicable by separate designation by our company
- △: Applicable only to self-supplied materials (including such sub-materials as anti-rust oil, cutting oil, etc.)
- ▲: Applicable to substances prohibited by NTN (for packaging materials, only lead, cadmium, hexavalent chromium, mercury and phthalic acid esters)
- /: Not applicable

[Applicability of providing document/information]

Underline (double line): Documents need to be submitted according to the Standards
Underline (wavy line): Documents to be submitted according to a separate request from us

6 Definition of terms

The Standards define the terms used herein as follows.

6.1 NTN environmentally hazardous substances

- (1) Substances determined by NTN to have an aspect of significantly affecting the global environment and human well-being.
- (2) Substances, for which limitations and/or information such as its use, application, contents, etc. are expected or may be expected to be disclosed in domestic and international regulations, or customer standards.

6.2 Control level

We control NTN environmentally hazardous substances at the following three levels.

6.2.1 I. NTN-prohibited substances

These are the substances which shall not be intentionally contained and unintentionally contained at the higher levels than their threshold in the products to be supplied to NTN.

6.2.2 II. Observation-requisite substances

Substances required to be immediately declared by the supplier in the case where they are intentionally contained or unintentionally contained at the higher levels than their threshold in the products to be supplied to NTN. Substances (SVHC), for which duty of information notification is imposed on the suppliers mainly under the REACH of chemicals.

6.2.3 III. Substances to be reported as requested by NTN

Substances, for which information on the chemicals contained in the products to be supplied is required to be controlled and to be provided when the examination of the chemical contents is requested by NTN.

6.3 Chemical containing in the products

Chemicals containing, i.e. addition in, filling in, mixture in or adhered to parts composing the products or materials to be used for production of the parts (including chemicals containing such as unintended mixture in or adhesion to the products in the manufacturing process).

6.4 Evidence

Documents certifying that the products to be supplied conform to the Standards (analysis data, ingredient list, mill sheet, SDS conforming to JIS Z 7250, non-inclusion certificate of raw material manufacturer, etc.)

Used to mean “the analytical data for certifying the non-inclusion of ELV/RoHS 10 substances” unless otherwise specified.

6.5 Threshold

The maximum allowable concentrations (in laws or the Standards) of the environmentally hazardous substances unintentionally contained in the products, which are computed in material units regarded as homogenous.

6.6 Homogeneous materials

Materials, which cannot be broken down into individual raw materials by mechanical actions such as removal, cutting, crushing, grinding, polishing, etc. (metal alloys, polymer alloys, paint, adhesive agents, ink, plating, etc.) For example, for the rubber seals (rubber + plated steel sheet) for bearings, each of rubber, steel plates, and plated layers is a homogeneous material.

6.7 ELV/RoHS 10 substances

Ten substances including four kinds of phthalic acid esters (DEHP, BBP, DBP, DIBP), which were prohibited under the RoHS Directive from July 22, 2019, added to the six substances (lead, mercury, cadmium, hexavalent chromium and two kinds of specific brominated flame retardant (PBB, PBDE)) whose inclusion has been conventionally prohibited under the ELV Directive and the RoHS Directive.

6.8 Control value

The content ratio of ELV/RoHS 10 substances which is not supposedly exceeded if substances are not contained intentionally and appropriately prevented from entering. When a control value is exceeded in a sampling analysis, the presence of procured items which have values beyond thresholds is suspected depending on analysis errors and variation in procured items.

7 Requirements to our suppliers

We would like to request our suppliers to implement the followings.

7.1 Promotion of business management taking environmental preservation into account

To address a wide variety of environmental problems including global warming, business entities are strongly encouraged to implement business management taking environmental preservation into account. Our suppliers shall work on the following requirements.

7.1.1 Compliance with environmental laws and regulations

When environmental laws and regulations are violated, there is a risk that the production activities are interfered by administrative disposition such as suspension of operations, etc. In September, 2017, there was the topical news that a European bearing manufacturer was forced to stop production due to the disposition of operation suspension for a Chinese metal processing manufacturer for the violation of environmental regulations.

Our suppliers are asked to comply with the environmental laws and regulations of their countries and promptly report to us when administrative disposition, etc., which adversely affects their production activities should be suggested due to the violation of laws and regulations.

7.1.2 Building up of Environmental Management System (certification acquisition from the authorized third party)

We request all of our suppliers to build the Environmental Management System (EMS) and acquire certification from the third party authorized by the authority concerned. Basically, the third-party certification refers to ISO 14001; however, the following third-party certifications may be accepted depending on the business scales of our suppliers.

- Eco Stage (Eco Stage Institute)
- EcoAction 21 (Institute for Global Environmental Strategies (IGES))
- KES (NPO KES Environmental Organization), etc.

The suppliers who have already obtained third-party certifications are requested to maintain, improve and update EMS. The suppliers, who have not yet acquired it, shall commence planning of certification acquisition as soon as possible to successfully achieve.

The suppliers shall submit the following form to NTN with required information filled. We will confirm the progress of EMS building-up based on the submitted information.

<Documents to be submitted/timing of submission>

Documents to be submitted	Timing for submission	Form	Submitted to
Confirmation sheet for environmental management system	<ul style="list-style-type: none"> When requested by NTN Within one month after a change is made to the supplier's management system (Certification acquirement, update, withdrawal) 	Form 1	Main purchasing department

7.1.3 Recognition/reduction of CO₂ emissions

CO₂ emissions reduction is a worldwide critical problem to be solved for prevention of global warming.

Our suppliers shall make best efforts in recognizing and reducing CO₂ emissions generated by business activities and provide the required information as demanded by NTN.

7.1.4 Activities for biodiversity preservation

Recently, against the background that biodiversity has been brought to a worldwide crisis, Japanese government has put “Basic Act on Biological Diversity” into effect and requires business entities to take actions for biodiversity preservation.

Our suppliers shall promote the actions for biodiversity preservation and report the progress of the activities as requested by NTN. For our policy about biodiversity, refer to Section 6 of the NTN Environmental Policy.

7.1.5 Promotion of water risk management

Business entities are required to understand the risks on business continuity by external factors on water resources (floods, droughts, water pollution, restrictions on available water volume, etc.) globally and to take actions to minimize their adverse effects.

We ask our suppliers as well to promote water risk management and report us its situation when so requested. As the water risk assessment tools for the business entities, AQUEDUCT^{*1} of WRI (World Resources Institute) and GLOBAL WATER TOOL^{*2} of WBCSD (World Business Council for Sustainable Development) are publicly available.

*1 <http://www.wri.org/applications/maps/aqueduct-atlas/>

*2 <https://www.wbcsd.org/Clusters/Water/Resources/Global-Water-Tool>

7.2 Control of environmentally hazardous substances and information provision

As regulations for environmentally hazardous substances have been increasingly institutionalized throughout the world, they have more stringent influence on business activities. In Europe, in particular, where ELV Directive, RoHS Directive, and REACH have been put in effect, rigorous control of environmentally hazardous substances (certification for nonuse, information provision, etc.) are required in terms of compliance with laws.

In this context, we have prepared our own list of NTN environmentally hazardous substances (**Attachment 4**) to thoroughly control the entire supply chain. The suppliers shall take the activities for control of environmentally hazardous substances and information provision described below.

7.2.1 Compliance with control criteria for NTN environmentally hazardous substances

The suppliers shall deliver parts, etc, in accordance with the provision “compliance with summary of limitations of use of environmentally hazardous substances in materials, products, and parts (HS-D-SB0001HE)” described in our drawings and purchase

specifications. The suppliers, who have not yet received our drawings and purchase specifications from NTN, shall understand information such as “I. NTN-prohibited substances”, “II. NTN observation-requisite substances,” and “III. Substances to be reported to NTN as required” contained in the list of NTN environmentally hazardous substances (**Attachment 4**) and accordingly, control their parts, etc.; in addition to observe the Standards.

7.2.2 Provision of information on environmentally hazardous substances contained and their composition

The suppliers shall be sure to provide information on contained chemical substances listed in the list of NTN environmentally hazardous substances as requested by NTN (it is not accepted that the suppliers do not disclose such information by assigning it to company secret). The NTN-specified formats (chemSHERPA, JAMA, originally-developed format, etc.) shall be used to provide information. Ingredients accounting for 90 wt% or more of the material composition shall be disclosed because they are necessary for registration in IMDS* as required by automobile manufacturers and automobile-related manufacturers.

* IMDS (International Material Data System)

The system to contain information on materials of the parts composing automobiles and contained substances in a database, which has been built mainly by leading automobile manufacturers in Japan, U.S., and Europe.

7.2.3 Request for building environmentally hazardous substance control system (Attachment 1)

We would like to ask for your efforts in understanding and managing environmentally hazardous substances contained in or adhering to products delivered to our company and construing a system which can guarantee the non-inclusion of NTN-prohibited substances, especially the ELV/RoHS 10 substances.

It should be noted that we will request that the suppliers perform voluntary inspection once a year. In response to this request, the suppliers shall check the status of their environmentally hazardous substance control using the check sheet (**Form 2**) and submit the result to NTN. If any failure in the control status is indicated, NTN may request that you improve the control system and, in some cases, we may visit the suppliers for field investigation. We will elicit cooperation from the suppliers in conducting field investigation.

<Documents to be submitted/submission timing>

Documents to be submitted	Timing for submission	Form	Submitted to
Check sheet for environmentally hazardous substance control system	<ul style="list-style-type: none"> • At start of business • When required by NTN (Once a year in principle)	Form 2	Main purchasing department

7.2.4 Prohibition of inclusion of NTN-prohibited substances and submission of non-inclusion certificate

As for the products to be supplied to us, intentional inclusion of NTN-prohibited substances is prohibited, regardless of their contents, and unintentional inclusion of those substances in amounts higher than the threshold values is prohibited.

We ask our suppliers to submit “Non-inclusion certification of NTN-prohibited substances (**Form 3**)” as a proof of conformity to this requirement.

The applications exempt from RoHS designation are also exempt in the Standards. Since their respective expiration dates are established and continuous reviewing is made, manage the exemptions according to the latest information obtained from the EU’s website, etc.

<Documents to be submitted/submission timing>

Documents to be submitted	Timing for submission	Form	Submitted to
Non-inclusion certification of NTN-prohibited substances	<ul style="list-style-type: none"> • At start of business • When required by NTN (Once a year in principle) 	Form 3	Main purchasing department

7.2.5 Description of confirmation results of non-inclusion of ELV/RoHS 10 substances

Position the non-inclusion of the ELV/RoHS 10 substances as a critical quality attribute, and enter the results of confirmation of non-inclusion in the test result report according to the procedure in **Attachment 2**.

Moreover, although the submission of the evidence which is the basis thereof for each lot is not required, prepare and submit the evidence in accordance with **Attachment 3** and the table below.

As the substances requiring evidence vary depending on the procured item, refer to **Table 2**.

<Documents to be submitted/submission timing>

Documents to be submitted	Timing for submission	Form	Submitted to
Test result report (Record the result of analytical verification)	Every lot	Add in your own form	Product purchasing departments
List of ELV/RoHS 10 substance evidences and their supporting evidences	<ul style="list-style-type: none"> • When required by NTN • At first arrival of new item • At first arrival of process change item 	Form 4	

7.2.6 Declaration of containing of NTN-prohibited substances/observation-requisite substances

In the products to be supplied to us, if it is found that NTN-prohibited substances and declarable essential substances are intentionally contained or unintentionally exceeding the threshold value, declare it immediately and voluntarily.

Be sure to meet this requirement because this declaration is requisite to perform the domestic/international legal duties.

* The substances, which has been known to be contained in parts but not reported to NTN, shall be declared to NTN.

<Documents to be submitted/submission timing>

Documents to be submitted	Timing for submission	Form	Submitted to
Declaration of containing of NTN-prohibited substances/observation-requisite substances	Immediately after it is known that substances are contained in parts	Form 5	Main purchasing department

7.2.7 Actions taken when detecting ELV/RoHS 10 substances in sampling analysis

We at NTN and our customers check for the presence or absence of inclusion of ELV/RoHS 10 substances by the sampling analysis at the time of acceptance of procured items.

Should contents exceeding the control values in the table below be detected in our acceptance analysis, or should inclusion exceeding the standard value specified by our customers in

customer's acceptance analysis be detected, we request that our suppliers clarify the reason and lower the concentration of the contained substances below the control value as necessary.

Table 3 Control values

Applicable substance		Control value (ppm)
1) Lead and compounds thereof (Pb)	Resins	100
	Other	500
2) Mercury and compounds thereof (Hg)		500
3) Cadmium and compounds thereof (Cd)	Resins	20
	Other	75
4) Hexavalent chromium compounds (Cr6+)		500
5) Polybrominated biphenyls (PBB)		500
6) Polybrominated diphenyl ethers (PBDE)		500
7) Di-2-ethylhexyl phthalate (DEHP)		500
8) Butyl benzyl phthalate (BBP)		500
9) Di-n-butyl phthalate (DBP)		500
10) Di-isobutyl phthalate (DIBP)		500

7.3 Other documents to be submitted

Please agree to the NTN Green Procurement Standards initiative and, to clarify the company information and responsibility system of the suppliers, submit the following documents.

<Documents to be submitted/submission timing>

Documents to be submitted	Timing for submission	Form	Submitted to
Green Procurement Standards Agreement and Company Information Registration Statement	<ul style="list-style-type: none"> • At start of business • When required by NTN • Within one month from time of change of described information 	Form 6	Main purchasing department

8 Handling of information

We handle properly personal information on the suppliers in accordance with laws and other norms. It should be noted that in some cases, information on environmentally hazardous substances in products to be procured, etc., are externally published as part of information on our products.

9 Contact

Procurement Management Department, Procurement Headquarters, NTN Corporation
 Phone: +81-6-6449-3598
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Division to which products are delivered: Quality Assurance Department, Procurement
Department

10 Supplementary provisions and revision history

The Standards will be brought to operation as of 1st April, 2018.

The Standards may be revised as requested by domestic/international laws or our customers, as well as when state of society is changed. The latest version can be obtained from our website.

[History]

NTN Group Green Procurement Standard 1st Edition 1st March, 2007

NTN Group Green Procurement Standard 2nd Edition 10th December, 2007

NTN Group Green Procurement Standard 3rd Edition 11th January, 2011

NTN Group Green Procurement Standard 4th Edition 1st April, 2012

NTN Group Green Procurement Standard 5th Edition 1st April, 2018