NTN Group Green Procurement Standards
(7th Edition)

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NTN Corporation

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2 Laws, Regulations, and Industry Standards Considered by NTN

(Form)

1 Confirmation Sheet for Environmental Management System
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3 Non-inclusion Certification of NTN-prohibited Substances
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1. Introduction

In line with its corporate philosophy, "We shall contribute to international society through creating new technologies and developing new products," the NTN Group aims to realize a "NAMERAKA Society" where people can lead a secure life in harmony with nature.

NTN's products, which include bearings and constant-velocity joints, have essentially been positioned as eco-friendly products that reduce energy loss through friction, and they contribute to the realization of a "NAMERAKA Society." To help prevent global warming, NTN is working to reduce greenhouse gas (GHG) emissions associated with our business activities across the entire supply chain, as well as putting tireless efforts into research and development with a view to further improving the performance of NTN's products and reducing energy consumption worldwide.

Meanwhile, the 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's products;

[2] reduction of environmentally hazardous substances used in the manufacturing process; and,

[3] introduction of production facilities and technologies capable of reducing environmentally hazardous substances.

Amid the situation where regulations on environmentally hazardous substances, which began in EU, have become global standards, and an increasing number of countries have enforced similar laws and regulations, customer requests for this matter are becoming more complicated and advanced. Therefore, not only we at NTN, but also our suppliers are required to strictly manage environmentally hazardous substances throughout the supply chain.

Furthermore, we continuously improve our Environmental Management System in accordance with ISO 14001 to reduce environmental loading arising from our business activities. We also ask our suppliers to promote environmentally-conscious business management, and obtain environmental certificates including ISO 14001.

We hope that you, our suppliers, fully 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 positively 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 our 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 CO_2 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 proactivity 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 throughout our supply chain under partnership with our suppliers to reduce environmental loading associated with NTN products and business activities and provide our customers with environmentally-friendly goods in order to fulfill social responsibility imposed on us as 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 and implementation of environmental management)" and good "environmental qualities of delivered products (not containing hazardous substances, etc.)".

Furthermore, as a prerequisite for dealing with our suppliers, it is necessary that the suppliers have a complete understanding of the chemical substances contained in their products, and that this information is shared between them and us as appropriate.

5. Scope

5.1 Intended suppliers

- Suppliers who supply materials (raw materials, parts, process materials, sub-materials, packaging materials, equipment, jigs, etc.) to be incorporated into NTN products, as well as used in the manufacturing process
- Suppliers who provide NTN with services such as assembling and processing (forging, cutting, grinding, heat treatment, surface treatment, etc.) or parts, etc.

5.2 Target procured items

All the items procured by NTN for incorporation into NTN products, as well as use in the manufacturing process. **Table 1** shows some specific examples.

Table 1 Specific examples of procured items

Category	Description	Specific examples
Raw materials	Raw materials composing NTN products	Steel materials, resin materials, rubber materials, adhesives, solder, surface treatment solutions for coating and plating, etc.
Parts	Parts, semi-finished products, finished products, oils, etc., incorporated into NTN products	Metal processed parts, resin parts, rubber parts, painted parts, surface treated parts such as coating and plating, grease, sensors, printed circuit boards, motors, etc.
Process materials	Oils, grinding stones, etc., used in our production process that do not adhere to or remain on NTN products at the time of shipment	Heat treatment oil, machining oil (for cutting or grinding), cleaning agents, solvents, intermediate rust-preventive oil, grinding stones, etc.
Sub-materials *1	Materials used in our production process that may adhere to or remain on NTN products at the time of shipment	Process materials that may adhere to or remain on products, such as rust-preventive oil, paint, tape, labels, printing ink, oil-based markers, etc.
Packaging materials	Materials used for packaging parts and materials, etc., at the time of arrival, and materials used for packaging NTN product at the time of shipment	Wooden frames, pallets, wooden boxes, corrugated fiberboards, cushioning materials, single-unit boxes, plastic boxes, trays, plastic bags, tape, cable ties, etc.

***1 Sub-materials to be used by the supplier shall be managed assuming that they are classified into parts.**

5.3 Compliance obligation of procured items

Table 2 shows the requirements to be followed for each category of procured items.

Table 2 Compliance obligation of procured items

Compliance items / Categories of procured items			7.1.1 Compliance with environmental laws and regulations	7.1.2 Building Environmental Management System (Form 1)	7.1.3 Understanding and reducing CO_2 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 Building environmentally hazardous substance control system (Form 2)	7.2.4 Prohibition of inclusion of NTN-prohibited substances and submission of non-inclusion certificate (Form 3)	7.2.5 Description of confirmation results of non-inclusion of ELV/RoHS 10 substances in test result reports (Form 4) Requirement of evidence: Lead, mercury, cadmium, hexavalent chromium	7.2.5 Description of confirmation results of non-inclusion of ELV/RoHS 10 substances in test result reports (Form 4) Requirement of evidence: PBB, PBDE	7.2.5 Description of confirmation results of non-inclusion of ELV/RoHS 10 substances in test result reports (Form 4) Requirement of evidence: Four types of phthalates	7.2.6 Declaration of containing NTN environmentally hazardous substances • Survey Form for Information on Products Containing Environmentally Hazardous Substances (Form 6)*4 • Declaration of Containing NTN-Prohibited Substances/Observation-requisite Substances (Form 5)	7.2.7 Actions taken when detecting ELV/RoHS 10 substances in sampling analysis	7.3 and Company Information Registration Statement (Form 7) Submission of NTN Group Green Procurement Standards Agreement
Raw materials	Steel material		▲	○	▲	▲	▲	▲	▲	○	○	○	／	／	○	▲	○
	Resin, etc.*2		▲	○	▲	▲	▲	▲	▲	○	○	○	○	○	○	▲	○
	Other		▲	○	▲	▲	▲	▲	▲	○	○	○	○	／	○	▲	○
Parts	Resin, etc.*2		▲	○	▲	▲	▲	▲	▲	○	○	○	○	○	○	▲	○
	Other		▲	○	▲	▲	▲	▲	▲	○	○	○	○	／	○	▲	○
Processed products	Supplied materials		▲	○	▲	▲	▲	／	／	／	／	／	／	／	／	／	○
	Self-procured materials*3		▲	○	▲	▲	▲	▲	▲	○	○	○	○	○	○	▲	○
Process materials	In contact with product		▲	○	▲	▲	▲	／	▲	○	○	○	○	○	○*5	▲	○
	Not in contact with the product		▲	○	▲	▲	▲	／	▲	○	○	／	／	／	○*5	▲	○
Sub-materials	Resin, etc.*2		▲	○	▲	▲	▲	▲	▲	○	○	○	○	○	○	▲	○
	Other		▲	○	▲	▲	▲	▲	▲	○	○	○	○	／	○	▲	○
Equipment and jigs	In contact with product	Resin, etc.*2	▲	○	▲	▲	▲	／	▲	○	○	○	○	○	○*5	▲	○
		Other	▲	○	▲	▲	▲	／	▲	○	○	／	／	／	○*5	▲	○
	Not in contact with the product		▲	▲	▲	▲	▲	／	▲	／	／	／	／	／	／	／	▲
Packaging materials	Resin, rubber		▲	○	▲	▲	▲	／	▲	○	○	○	／	○	○*5	▲*5	○
	Other		▲	○	▲	▲	▲	／	▲	○	○	○	／	／	○*5	▲*5	○
Research and development applications	Possibility of being provided by the customer	Yes	▲	○	▲	▲	▲	▲	▲	○	○	／	／	／	○	▲	○
		No	▲	○	▲	▲	▲	／	▲	／	／	／	／	／	／	／	○
Other			▲	▲	▲	▲	▲	／	／	／	／	／	／	／	／	／	▲

[Legend] ○: Applicable (Documents must be submitted in accordance with the Standards) ▲: Applicable (Documents must be submitted upon separate request from NTN) /: Not applicable

[Note] *2 Resin, rubber, adhesive, paint, coating, etc.

*3 Includes sub-materials such as rust-preventive oil and cutting oil

*4 Limited to certain suppliers as requested by NTN

*5 Applicable to NTN-prohibited substances (see Section **6.1**; for packaging materials, applicable substances are lead, cadmium, hexavalent chromium, mercury, phthalates, and MOAH and MOSH described in **Attachment 2**, **Chapter 2**, Regulation No. 18)

6. Definition of terms

For the purpose of the Standards, the terms are defined as follows.

6.1 NTN environmentally hazardous substances

Among the substances (substance groups) specified in the laws and regulations and industry standards listed in the "Laws, Regulations, and Industry Standards Considered by NTN (Attachment 2)," the substances that fall under either (1) or (2) below.

(1) Substances determined by NTN to have an environmental impact (environmental aspect) significantly affecting the global environment and human well-being

(2) Substances for which limitation and/or information disclosure of their use, application, content, etc., are required, or expected to be required in the future, under domestic/international regulations or customer standards

6.2 Control level

Level of handling applicable to the entire substance (group) by the law, regulation, or industry standards listed in the "Laws, Regulations, and Industry Standards Considered by NTN (Attachment 2)."

The specific controls levels and handling shall be as shown in the table below.

<Control level and handling in Attachment 2>

Control level	Handling
NTN-prohibited substances	Substances which shall not be intentionally contained or unintentionally contained at levels higher than their threshold in the products (see Section **6.3**).
NTN observation-requisite substances	Substances required to be immediately declared when they are found to be intentionally contained or unintentionally contained at levels higher than their threshold in the products (see Section **6.3**).

Based on these control levels, NTN controls environmentally hazardous substances contained in procured items such as raw materials, parts, processed products, process materials, sub-materials, equipment, jigs, and packaging materials.

In addition, regarding the following 10 substances: lead, mercury, cadmium, hexavalent chromium, and two types of specific brominated flame retardants (PBB and PBDE), which are prohibited under the ELV Directive and RoHS Directive, plus four types of phthalates (DEHP, BBP, DBP, and DIBP), which are prohibited under the RoHS Directive from July 22, 2019, non-inclusion is positioned as a critical quality attribute and they will be controlled individually. Details are provided in Section **7.2.4**.

When applying the control standards set forth in this section to NTN procured items, if our control standards are stricter than those stipulated by law and regulations, and if it is difficult to take measures to meet those standards, we will make a case-by-case decision on whether or not to use the items after discussions between NTN and the supplier.

6.3 Chemicals contained in the products

Chemicals adding in, filling in, mixing in or adhering to parts composing the products or materials to be used in them.

This includes cases where chemicals mix in or adhere to the products unintentionally during the manufacturing process.

6.4 Evidence

Documents certifying that the delivered products conform to the Standards (e.g., non-inclusion certificate of raw material manufacturer, ingredient list, mill sheet, SDS conforming to JIS Z 7253, analysis data).

This refers to "analysis data for certifying the non-inclusion of ELV/RoHS 10 substances" unless otherwise specified.

6.5 Control value

The content ratios of ELV/RoHS 10 substances set by NTN, which are not supposedly exceeded if the 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 individual variation.

6.6 Homogenous materials

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

6.7 Threshold

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

7. Requirements for our suppliers

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

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

7.1.2 Building 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.

- EcoAction 21 (Institute for Promoting Sustainable Societies (IPSuS))
- KES (NPO KES Environmental Organization)
- Eco Stage (Eco Stage Institute), etc.

The suppliers who have already obtained third-party certifications are requested to maintain, improve and update EMS. The suppliers who have not yet obtained them shall commence planning and taking action toward certification acquisition as soon as possible. We will confirm the progress of EMS building at our suppliers based on the “Confirmation Sheet for Environmental Management System (Form 1)” below.

<Documents to be submitted/timing of submission>

Documents to be submitted	Timing for submission	Submitted to
Confirmation Sheet for Environmental Management System (Form 1)	• When requested by NTN (Once a year in principle) • Within one month of a change being made to the supplier's management system (certification acquisition, renewal, surrender, etc.)	NTN business office

7.1.3 Understanding and reducing CO_2 emissions

CO_2 emissions reduction is a worldwide critical social issue to be solved for prevention of global warming.

To contribute to resolving this social issue, we have established the NTN Carbon Neutrality Target and are working on reducing CO_2 emissions not only in our business activities but across the entire supply chain.

- **NTN Carbon Neutrality Target**
  - **CO_2 emission reduction target (Scopes 1 and 2)**
    50% reduction by fiscal year 2030 (compared to fiscal year 2018)
    Achieve carbon neutrality by fiscal year 2035
  - **CO_2 emission reduction target (Scope 3)**
    Achieve carbon neutrality by fiscal year 2050

Our suppliers shall make best efforts in understanding and reducing CO_2 emissions generated by their business activities and provide the required information when requested by NTN.

7.1.4 Activities for biodiversity preservation

Recently, against the background that biodiversity has been brought to a worldwide crisis, the Japanese government has ratified the Convention on Biological Diversity and business entities are required to take action 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 Item 6 of **2. 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 action 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 water risk assessment tools for business entities, AQUEDUCT[*3] of WRI (World Resources Institute) and Water Risk Filter[*4] of WWF (World Wide Fund for Nature) are publicly available.

*3 http://www.wri.org/applications/maps/aqueduct-atlas/

*4 https://riskfilter.org/

7.2 Environmentally hazardous substance control system and its operation

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 the ELV Directive, RoHS Directive, and REACH Regulation have been put in effect, rigorous control of environmentally hazardous substances (certification for nonuse, information provision, etc.) is required in terms of compliance with relevant laws.

Amid these developments, we are committed to thoroughly managing environmentally hazardous substances throughout our supply chain. Comprehensive management of information on containing or not containing **NTN environmentally hazardous substances** (Section **6.1**) and appropriate information communication between our suppliers and us as needed, is a prerequisite for doing business with you.

In this context, our suppliers shall work on the following requirements.

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-SB0001)" described in our drawings and purchase specifications.

The suppliers who have not yet received drawings or purchase specifications from NTN shall understand and control information on the inclusion of substances (substance groups) stipulated in the laws, regulations, and industry standards listed in the "Laws, Regulations, and Industry Standards Considered by NTN (Attachment 2)," and take action in accordance with 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 the inclusion of substances (substance groups) stipulated in the laws, regulations, and industry standards listed in the "Laws, Regulations, and Industry Standards Considered by NTN (Attachment 2)" as requested by NTN. It is not accepted that the suppliers do not disclose such information on the grounds of corporate confidentiality. The NTN-specified formats (chemSHERPA, JAPIA, originally-developed format, etc.) shall be used to provide information.

Ingredients accounting for 90 wt% or more of the material composition of a delivered product shall be disclosed in accordance with the latest manual registered with IMDS[*5], when requested by an automobile manufacturer, etc.

*5 IMDS (International Material Data System)
A 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 Building environmentally hazardous substance control system

For products delivered to NTN, we ask the suppliers to control the inclusion and adhesion of chemical substances stipulated in the laws, regulations, and industry standards listed in the "Laws, Regulations, and Industry Standards Considered by NTN (Attachment 2)," and establish a reporting and assurance system to us. In particular, non-inclusion of the ELV/RoHS 10 substances shall be positioned as a critical quality attribute, and a non-inclusion guarantee system shall be established. Specifically, in their environmentally hazardous substance control system, our suppliers are requested to establish individual frameworks that enable reliable control for **(1) upstream management, (2) process management, (3) change management, (4) response to abnormal events, (5) confirmation at the time of shipment, and (6) disclosure of information to NTN** shown below. For management points, refer to the "Guidelines for the Management of Chemicals in Products" available on the CMP Consortium website.

(1) Upstream management

[1] Supply chain management

- Listing and managing the raw materials, parts, processed products, process materials, sub-materials, and packaging materials (hereinafter referred to as "parts, packaging materials, etc.") composing the products delivered to us, as well as their suppliers.
- Understanding, listing, and managing the supply chain, tracing back to raw material manufacturers, for parts, packaging materials, etc.
- Presenting your environmentally hazardous substance control criteria to your suppliers and requesting their compliance.
- Understanding the environmentally hazardous substance control status of your suppliers using audit checklists prepared by you.

[2] Understanding inclusion information for parts, packaging materials, etc.

- Obtaining information on the inclusion of environmentally hazardous substances in procured items from your suppliers, including ingredient lists, analysis data, MIL sheets, and SDS for parts, packaging materials, etc., or conducting inclusion surveys.
- Thoroughly obtaining analysis data on the ELV/RoHS 10 substances.
- Obtaining inclusion information for sub-materials.
- Obtaining the latest inclusion information and resolving any uncertainties.

[3] Design and development management

- Confirming compliance of all parts, etc., with the "NTN Group Green Procurement Standards" during design and development.
- Clearly stating the environmentally hazardous substance control criteria on drawings, such as "Comply with the NTN Group Green Procurement Standards."

(2) Process management

[1] Confirmation on acceptance

- Conducting acceptance confirmation on items received from your suppliers using the most appropriate method according to the risk (e.g., checking the product name and part number, checking inclusion information received from your suppliers, checking analysis data received from your suppliers, conducting sampling analysis by yourself).

[2] Process management

- Identifying and managing inclusion/non-inclusion of environmentally hazardous substances in the manufacturing process, and preventing mixing in and misuse.
- Confirming non-inclusion of environmentally hazardous substances in sub-materials and clearly stating the part numbers and product names used in work procedures, etc., for the purpose of preventing environmentally hazardous substances from mixing in via sub-materials.
- Identifying materials containing highly migratory environmentally hazardous substances, such as phthalates, as well as components used in the manufacturing process and packaging materials, and substituting them with non-containing products. If substitution is not possible, implementing thorough transfer prevention measures, such as strictly separating equipment and jigs.

(3) Change management

- Checking for any change points related to inclusion of environmentally hazardous substances (especially ELV/RoHS 10 substances) in parts, etc., during design changes and process changes.
- If there are any changes related to inclusion of environmentally hazardous substances, reporting the details of the changes using the "Process Change Approval Application Form" and taking necessary action in accordance with our instructions.

(4) Response to abnormal events

- In the event of a quality abnormality, such as mixing in or adhesion of **NTN environmentally hazardous substances** (Section **6.1**) to products delivered to NTN, promptly notifying it to us, investigating the cause, implementing corrective measures to prevent recurrence, and reporting the details of the results by the method of reporting used for other quality abnormalities.

(5) Confirmation at the time of shipment

- Thoroughly understanding and confirming the control status and inclusion information of

environmentally hazardous substances in products delivered to us at the time of shipment, with establishing traceability and sharing information in mind.

- Confirming using the most appropriate method, such as verifying items **(1)** to **(4)** above and conducting sampling analysis by yourself, in accordance with the risk of environmentally hazardous substances mixing in products delivered to us.

(6) Disclosure of information to NTN

- Promptly disclosing, when requested, information specified in the NTN Group Green Procurement Standards and information necessary for complying with newly added laws, regulations, or customer standards.
- In particular, voluntarily and promptly reporting to us upon discovery of inclusion of **NTN-prohibited substances** (Section **6.2**) or **NTN observation-requisite substances** (Section **6.2**) that has not been reported to us.

It should be noted that we will request that our suppliers perform voluntary inspection once a year. In response to this request, the suppliers shall check the status of their environmentally hazardous substance control and report the results to NTN using the "Check Sheet for Environmentally Hazardous Substance Control System (Form 2)." 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 you for an on-site audit.

<Documents to be submitted/timing of submission>

Documents to be submitted	Timing for submission	Submitted to
Check Sheet for Environmentally Hazardous Substance Control System (Form 2)	• At start of doing business • When requested by NTN (Once a year in principle)	NTN business office

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** (Section **6.2**) is prohibited, regardless of their content, and unintentional inclusion of those substances in amounts higher than the threshold values is prohibited. At NTN, regarding the following 10 substances: lead, mercury, cadmium, hexavalent chromium, and two types of specific brominated flame retardants (PBB and PBDE), which are prohibited under the ELV Directive and RoHS Directive, plus four types of phthalates (DEHP, BBP, DBP, and DIBP), which are prohibited under the RoHS Directive from July 22, 2019, non-inclusion is positioned as a critical quality attribute and they are controlled individually. 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 the RoHS Directive are also exempt from the Standards. However, since their expiration dates are established and regularly reviewed, the suppliers are required to manage their exemption status according to the latest information available from the European Commission website, etc.

<Documents to be submitted/timing of submission>

Documents to be submitted	Timing for submission	Submitted to
Non-inclusion Certification of NTN-prohibited Substances (Form 3)	• At start of doing business • When requested by NTN (Once a year in principle)	NTN business office

7.2.5 Description of confirmation results of non-inclusion of ELV/RoHS 10 substances in test result reports

Our suppliers are required to enter the ELV/RoHS 10 substances non-inclusion confirmation results in the test result report in accordance with "Method for Reporting Non-containing of ELV/RoHS 10 Substances and Evidence Preparation (Attachment 1)."

Although the submission of evidence as the basis of non-inclusion for each lot is not required, the suppliers shall prepare and submit "List of ELV/RoHS 10 Substance Evidences (Form 4)."

As the substances requiring evidence vary depending on the procured item, refer to **Table 2** in Section **5.3** for details.

<Documents to be submitted/timing of submission>

Documents to be submitted	Timing for submission	Submitted to
Test result report including analytical confirmation results (supplier format)	Every lot	NTN product purchasing departments
List of ELV/RoHS 10 Substance Evidences (Form 4)	• When requested by NTN • At first delivery (new item, process change item)	

7.2.6 Declaration of containing NTN environmentally hazardous substances

For products delivered to NTN, the suppliers shall be sure to confirm the threshold, allowable concentration, etc., stipulated in the laws, regulations, and industry standards listed in the "Laws, Regulations, and Industry Standards Considered by NTN (Attachment 2)." If it is found that **NTN-prohibited substances** (Section **6.2**) or **NTN observation-requisite substances** (Section **6.2**) are contained (including when the threshold is exceeded for substances (substance groups) with a threshold specified), the supplier is required to voluntarily and immediately submit "Declaration of Containing NTN-prohibited Substances/Observation-requisite Substances (Form 5)." Note that, the substances that have been known to be contained but not reported to NTN shall also be declared to NTN. Be sure to meet this requirement because this declaration is requisite to fulfill the domestic/international legal duties.

To some suppliers, we may request submission of "Survey Form for Information on Products Containing Environmentally Hazardous Substances (Form 6)."

<Documents to be submitted/timing of submission>

Documents to be submitted	Timing for submission	Submitted to
Declaration of Containing NTN-Prohibited Substances/Observation-requisite Substances (Form 5)	Immediately after it is known that substances are contained	• NTN business office • ESG Promotion Department*
Survey Form for Information on Products Containing Environmentally Hazardous Substances (Form 6)	When requested by NTN	(Specified at the time of requesting)

* Contact information is provided in Chapter **9**.

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

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

Should content exceeding the control value in the table below be detected in our sampling analysis, or should inclusion exceeding the standard value specified by our customer be detected in the customer's sampling analysis, we request the relevant supplier to clarify the reason and lower the content of the contained substances below the control value as necessary.

Table 3 Control values in sampling analysis of ELV/RoHS 10 substances

Applicable substance		Control value (ppm)
1) Lead and its compounds (Pb)	Resins	100
	Other	500
2) Mercury and its compounds (Hg)		500
3) Cadmium and its compounds (Cd)	Resins	20
	Other	75
4) Hexavalent chromium compounds (Cr^{6+})		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 Submission of NTN Group Green Procurement Standards Agreement and Company Information Registration Statement

Please agree to the NTN Green Procurement Standards initiative and, to clarify your company information and responsibility system, submit "NTN Green Procurement Standards Agreement and Company Information Registration Statement (Form 7)."

<Documents to be submitted/timing of submission>

Documents to be submitted	Timing for submission	Submitted to
NTN Group Green Procurement Standards Agreement and Company Information Registration Statement (Form 7)	• At start of doing business • When requested by NTN • Within one month of change to registered information	NTN business office

7.4 Effective date of the Green Procurement Standards

The Standards are effective 30 days after the date of distribution or on the deadline of submission of documents stipulated by NTN, whichever is later.

8. Handling of information

We handle personal information and other confidential information provided by our suppliers properly, in accordance with relevant laws, regulations, and other norms.

It should be noted that, in some cases, information on environmentally hazardous substances in procured items, etc., may be externally published as part of information on our products.

9. Contact

• Matters concerning the submission of forms, etc.

NTN business office (the department responsible for distributing the Standards)

* If the contact details are unknown, please contact our purchasing department with whom you have business dealings.

• Matters concerning the contents of the NTN Group Green Procurement Standards

ESG Promotion Department, Group Management HQ, NTN Corporation

Mail: ntn_japan_green@ntn.co.jp

10. Supplementary provisions and revision history

The Standards will be brought to operation as of March 23rd, 2026.
The Standards may be revised as needed in response to relevant domestic and international laws and regulations, customer requirements, as well as when the state of society changes.
The latest version can be obtained from our website.

Edition	Date of revision	Main revision details
1st Edition	March 1, 2007	Established
2nd Edition	December 10, 2007	Minor revisions, such as clarification of where to submit various forms
3rd Edition	January 11, 2011	• Changed classification of NTN environmentally hazardous substances from two categories (NTN-prohibited, observation) to three categories (NTN-prohibited, observation-requisite, reported as requested). Added "observation-requisite substances" to comply with the obligation to communicate information on Substances of Very High Concern (SVHC) under EU REACH Regulation. • Reviewed applicable substances To comply with revisions to various domestic and foreign laws and regulations, industry standards, and customer standards. • Added requests relating to CO_2 reduction and LCA/environmental efficiency, and conservation of biodiversity.
4th Edition	April 1, 2012	• Revised NTN environmentally hazardous substances list Added three NTN-prohibited substances in response to changes in laws and regulations and industry/customer standards. Added 27 substances to the list of observation-requisite substances in response to the addition of SVHC under EU REACH Regulation.
5th Edition	April 1, 2018	• Changed four phthalic acid esters from "NTN-prohibited substances (to be regarded as "observation-requisite substances" until a deadline separately stipulated by NTN)" to "NTN-prohibited substances," in anticipation of revisions to EU RoHS Directive. • Reviewed applicable substances Added SVHC under EU REACH Regulation, added after the 4th Edition, to observation-requisite substances, and added/deleted/resorted other substances. • Added a list of "Compliance obligation of procured items" Clarified the matters that should be complied with for each procured item. • Added a request to suppliers to promote water risk management. • Reviewed the attachments and forms.
6th Edition	June 3, 2024	• The list of NTN environmentally hazardous substances, previously an attachment to the Green Procurement Standards, was separated from the Standards as a standalone appendix. (Please refer to "Supplementary provisions and revision history" for details on the main revisions made to the list of NTN environmentally hazardous substances.) • Added NTN's carbon neutrality targets.
7th Edition	March 23, 2026	• Changed the control of environmentally hazardous substances from the method using the "List of NTN Environmentally Hazardous Substances" to a method using laws, regulations, and industry standards listed in the "Laws, Regulations, and Industry Standards Considered by NTN." • Established a new document "Laws, Regulations, and Industry Standards Considered by NTN (Attachment 2)" describing laws, regulations, industry standards and substance confirmation methods associated with the change to the control criteria for environmentally hazardous substances, and revised forms accordingly.