

KGS Procurement Standard Annex: Environmentally Hazardous Substance Management Standard

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1. Purpose

This Standard has been designed to clearly describe the management standard for the chemical substances that are related to our products as well as to promote awareness of the standard among our business partners.

2. Scope of Application

This Standard applies to all products, parts, materials, and indirect materials we purchase as well as the manufacturing processes of these items.

3. Application of the Standard

This Standard shall be applied in compliance with all relevant laws and regulations. If this Standard does not satisfy customer's requirements, customer's standard may be applied individually.

We ask our business partners to build CMS (Chemical substances Management System) so that suppliers who deliver goods to us including their outsourcing contractors as well as those from whom they purchase goods can manage this Standard properly and effectively.

Concerning CMS establishment, please refer to "Chemical substances management guideline" and "List of Action Items & Check Sheet" of Joint Article Management Promotion-consortium (JAMP).

https://chemsherpa.net/docs/guidelines

4. Definition of Terms

1) Supplier and Customer

"Supplier" refers to a company or a group from whom we purchase goods. "Customer" refers to a company or a group to whom we sell goods.

2) Indirect material

Indirect material refers to packaging materials (carton, plastic bag, cushioning material, tape, label, ink, adhesive, etc.) and chemicals used in a production process (mold lubricant, solvent, cleaning agent, etc.).

3) Environmentally hazardous substance

Environmentally hazardous substance refers to a substance contained in products and materials or used during manufacture which has significant adverse impact (aspect) on human body and/or global environment. In accordance with laws and regulations as well as customer requests, we specify the substance to manage it by planning its elimination or reduction.

4) Containment

Containment refers to a condition in which the substance is mixed in or added and attached to a product, or fills the product regardless of whether it is intentional or not.

5) Impurity

Impurity refers to a chemical substance that is naturally and unintentionally contained in materials and/or formed during production and cannot be removed completely by technical means. The substances which have maximum allowable concentrations defined in this Procurement Standard shall not be contained more than the limit even if it is contained as impurities.

6) Content rate

Content rate refers to a value that is the mass of the designated substance in one component (in homogeneous material) divided by the mass of the component (the homogeneous material).

7) Intentional use

Intentional use refers to the intentional use of chemical substances which occurred when the substances are expected to be contained during the manufacturing or work processes of materials, parts, or products. The purpose of this use is to achieve the appearance or quality characteristics of the materials, parts, or products.

8) Homogeneous material

Homogeneous material refers to a material that cannot be mechanically disjointed into different materials. The term "mechanically disjointed" means that the materials can be, in principle, separated by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes.

(Example: plastics, ceramics, glass, metals, alloys, paper, board, resins, ink, coat, etc.)

9) Evidence

Evidence is the result of quantitative and qualitative analysis of a specified substance. For the substances with the specific MCV, its evidence must be obtained by quantitative analysis method with adequate accuracy. See Table 1-4 for details of the analysis method.

10) Safety Data Sheet (SDS) or Material Safety Data Sheet (MSDS)

These sheets are a form with data regarding the properties and handling of a product that a company shall submit to another company where the product that could contain hazardous substances is delivered.

11) Substances of Very High Concern (SVHC)

Substances of Very High Concern (SVHC) are chemical substances designated as substances of very high concern in REACH Regulation of EU.

12) JAMA sheet

The JAMA sheet is a standard survey form used to gather information on materials of automobile parts and contained substances proposed by Japan Automobile Manufacturers Association, Inc. (JAMA).

13) JAPIA sheet

The JAPIA sheet is the successor to the JAMA sheet, and refers to the standard survey format for collecting information on materials and substances contained in automotive parts proposed by the JAPIA sheet liaison group, which is made by industry groups such as Japan Auto Parts Industries Association and The Japan Society of Industrial Machinery Manufacturers.

14) International Material Data System (IMDS)

The International Material Data System (IMDS) is the web-based system to register and report data for gathering and analyzing automotive parts and material information.

15) Global Automotive Declarable Substance List (GADSL)

The Global Automotive Declarable Substance List (GADSL) is a list of declared or banned substances defined by GASG (Global Automotive Stakeholders Group) which consists of automotive, parts, and chemical manufacturers in Japan, the U.S., and Europe. Declarable and banned substances appeared in IMDS, JAMA and JAPIA sheets are created based on this list.

16) chemSHERPA

chemSHERPA is a collective term for the newly developed scheme led by Ministry of Economy, Trade and Industry to provide information on the chemical substances contained in a product.

5. Management Standard for Environmentally Hazardous Substances

Our company manages environmentally hazardous substances by categorizing into two ranks.

| | | Dannad | - Must not be contained in products, packaging | See Table 1-1 |
|---|---|----------------------|---|--|
| Α | Α | Banned substance | materials, etc. | Banned |
| | | | - Must not be used in manufacturing processes | Substance |
| | В | Controlled substance | It is preferable that containing the substances in products or packaging materials and using them in manufacturing processes are avoided. Presence of such substances in products (and its content if there is any) must be confirmed. | See Table 2-1 Controlled Substance |

Exempt uses of the banned substances are specified in Table 1-2 Exemption to Use. In case a substance is listed under both categories, the substance shall be regarded as a banned substance.

- 6. Survey on Environmentally Hazardous Substances
- 1) Suppliers are requested to provide us with the following information on chemical substances used in products, parts, materials, and packaging materials that are delivered to us as well as those used in manufacturing processes.

| Goods delivered to KGS | | Document to be submitted |
|----------------------------------|--|--|
| 1. Raw material | | (1) MSDS or SDS (2) chemSHERPA (3) Chemical Substance Content Survey (4) Evidence of RoHS compliant (Analysis data) |
| 2. Parts | | (1) MSDS (MSDS for raw material) or SDS (2) chemSHERPA (3) Chemical Substance Content Survey (4) Survey of Chemical Substance Used in Manufacturing Process (5) Evidence of RoHS compliant (Analysis data of parts or raw material used) |
| Indirect material 4. Product by | Packaging material Medial agent (mold release, solvent, adhesive etc.) Product for which | (1) MSDS (MSDS for raw material) or SDS (2) Confirmation of Non-Use of Banned Substances for Packaging Material (1) MSDS or SDS (2) Chemical Substance Content Survey (1) Survey of Chemical Substance Used in Manufacturing Process |
| contract manufacturers | KGS supplies with materials Product for which our supplier | (1) MSDS or SDS for raw material (2) chemSHERPA for raw materials |
| | purchases materials | (3) chemSHERPA for parts, plating, etc. (4) Chemical Substance Content Survey (5) Survey of Chemical Substance Used in Manufacturing Process (6) Confirmation of Non-Use of Banned Substances for Packing Material (7) Evidence of RoHS compliant (Analysis data of parts or raw material used) |

- 2) If there is any information you cannot disclose due to its confidentiality, please inform us first, then provide us with a non-inclusion certificate for banned substances.
- 3) By our customers' request, KGS may ask you to conduct a separate survey. (IMDS, JAMA sheet, JAPIA sheet or other customer specific formats)

Note: The component table annexed to Chemical Substance Content Survey can be replaced with the JAMA sheet, JAPIA sheet or IMDS.

Revision History

| Version | Revision date | Revision details |
|---------|-------------------|--|
| 1 | November 01, 2008 | (1) Reviewed the second edition of KGS Procurement Standard for making the following revisions. Then, issued Environmental Hazardous Substance Management Standard as the first annex to the third edition. (2) Reviewed the substances of (A) and (B) and replaced assigned symbols with sequential number. |
| 2 | October 01, 2010 | Fully reviewed controlled substances and its investigation methods along with responding to REACH regulation, revision of Japanese Chemical Substances Control Law, and change of requirements from customers etc. |
| 3 | March 20, 2012 | (1) Reviewed the Exemption to Use a Banned Substance of Polyvinyl chloride (PVC) Table1-1, No.58(2) Updated the REACH SVHC candidate list to contain 73 substances. |
| 4 | July 31, 2012 | (1) Updated the REACH SVHC candidate list to contain 86 substances. |
| 5.0 | January 11, 2013 | Changed the number assignment rule. Transferred SVHC substances under REACH Regulation to Controlled substances. However, some SVHC substances still remain as Banned substances. Fully reviewed banned and controlled substances along with responses to REACH Regulation, revision of Japanese Chemical Substances Control Law, and changes of customer requirements. Changed the analysis method for 6 RoHS substances to IEC62321. Changed the wording of "MSDS" to "MSDS or SDS". |
| 5.1 | July 31, 2013 | (1) Updated the REACH SVHC candidate list to contain 146 substances. |
| 5.2 | January 31, 2014 | Added 2 substances to substance list under PAH (polycyclic aromatic hydrocarbon). Added 1 substance to substance list under specific phthalate esters. Added endosulfan and benzoepin as banned substances. Updated the REACH SVHC candidate list to contain 153 substances. |
| 5.3 | July 31, 2014 | Updated the REACH SVHC candidate list to contain 157 substances. Added N – Phenyl – benzenamine reaction products with styrene and 2, 4, 4 – trimethylpentene (BNST) as controlled substances. Changed the wording of "JGP format" to "Green Procurement Survey Response Tool". Updated the list of banned substances and of exemptions for prohibited substances. |
| 5.4 | January 31, 2015 | Added the text concerning CMS establishment. Added object substance to Table. Updated the REACH SVHC candidate list to contain 161 substances. |
| 5.5 | July 31, 2015 | (1) Newly designate PFOA control product, BNST as a prohibited substance. (2) Updated the REACH SVHC candidate list to contain 163 substances. |
| 5.6 | January 31, 2016 | (1) Updated the REACH SVHC candidate list to contain 168 substances. |

| 5.7 | July 31, 2016 | (1) Changed the previous "Polychlorinated Naphthalenes with 3 or more chlorine atoms" to "Polychlorinated Naphthalenes with 1 or more chlorine atoms". (2) Added Hexachlorobutadiene to Banned Substances. (3) Updated the total number of substances on the REACH SVHC candidate list to 169. |
|-----|--------------------|--|
| 5.8 | Feburuary 28, 2017 | (1) Updated the REACH SVHC candidate list to contain 173 substances. |
| 5.9 | August 31, 2017 | (1) (Added Class 1 Designated Hazardous Substances pursuant to Soil Contamination Countermeasures Act to Banned Substances.) |
| | 14 1 04 0040 | (2) Updated the REACH SVHC candidate list to contain 174 substances. |
| 6.0 | March 31, 2018 | (1) Added a part of candidate chemicals listed under the Stockholm Convention to Banned Substances. |
| | | (2) Updated the REACH SVHC candidate list to contain 181 substances. |
| 7.0 | October 1, 2018 | (1) Added 3 substances to substance list under Specific organophosphorous compounds. |
| | | (2) Change the substance name of A-42 to "specific |
| | | phosphorus compound". (3) Updated the REACH SVHC candidate list to contain 191 |
| | | substances. (4) Added 4 phthalate substances as Confirmation of Non-Use |
| | | of Banned Substances for Packing Material. (5) Added 4 phthalate substances and Asbestos as |
| | | Confirmation of Non-Use of Banned Substances for Packing Material". |
| 7.1 | April 1, 2019 | Updated the REACH SVHC candidate list to contain 197 substances. |
| 7.2 | November 1, 2019 | (1) Updated the REACH SVHC candidate list to contain 201 substances. |
| | | (2) Updated the list of exemptions for prohibited substances. |
| | | (3) Changed the substance name of A-67 to "Perfluorooctanoic acid (including salt) (PFOA) and perfluorooctanoic acid related substances". |
| | | (4) Updated the list of substances exemplified in "A-29 Ozone depleting substance" and "A-31Greenhouse effect gas". |
| 7.3 | May 26, 2021 | (1) Added the "JAPIA sheet" in 4. Definition of Terms.(2) Updated the list of substances exemplified in "A-42 Specific |
| | | phosphorus compound". |
| | | (3) Added the chemical substances under TSCA and by customer request in the list of prohebited substances (No.78 |
| | | \sim 84). (4) Updated the list of exemptions for prohibited substances. |
| | | (5) Updated the REACH SVHC candidate list to contain 211 |
| 7.4 | Oct 29, 2021 | substances. (1) Updated the REACH SVHC candidate list to contain 219 |
| 7.5 | May 2, 2022 | substances. (1) Updated the REACH SVHC candidate list to contain 223 |
| 7.6 | Dec 13, 2022 | substances. (1) Added Perfluorohexane-1-sulphonic acid (PFHxS) and its |
| | | salts and Perfluorocarboxylic acids (PFCAs) and its salts and related substances to banned substances. |
| | | (2) Updated the list of substances exemplified in "A-67 |
| | | Perfluorooctanoic acid (including salt) (PFOA) and perfluorooctanoic acid related substances" and "B-17 |
| | | Fluorine and its compounds". |
| | | (3) Updated the list of exemptions for prohibited substances.(4) Added Neodymium and its compounds to controlled |
| | <u>i</u> | |

| | | substances. (5) Updated the REACH SVHC candidate list to contain 224 substances. |
|-----|--------------|--|
| 7.7 | May 13, 2023 | Added 2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328) to banned substances. Updated the REACH SVHC candidate list to contain 233 substances. |
| 7.8 | Nov 10, 2023 | Added Perfluorohexanoic acid (PFHxA), its salts and PFHxA-related substances to banned substances. Updated the list of exemptions for prohibited substance. Updated the REACH SVHC candidate list to contain 235 substances. |
| 7.9 | Apr 30, 2024 | (1) Updated the REACH SVHC candidate list to contain 240 substances. |