# MITSUBA GROUP GREEN PROCUREMENT GUIDELINE Version 5

The environmental requirements for suppliers.



© 2024, MITSUBA Corporation - All rights reserved.

#### INTRODUCTION

Today, the awareness towards environmental concerns has been raised even more in the whole society, while the company, as well, is strongly being demanded to create a recycling-oriented society.

We have addressed a decrease in environmental burdens as one of the most critical business challenges because we think that we should seek for the environmental management bearing always in mind what a society really desires.

Our products are made using materials delivered from a number of our suppliers. For this reason, our in-house environmental management activities alone will not be good enough to reduce environmental burdens; it will absolutely be imperative to realize environmental management activities across the entire supply chain involving all our suppliers.

In addition, global production and sales have been increasing more than ever.

Under such circumstances, we will continue our efforts for environmental burden reduction by establishing and maintaining the Environmental Management System for worldwide supply chain.

Your understanding and support will be greatly appreciated for our approach to global environmental protection.

# INDEX

1.	POS	SITION OF THIS GUIDELINE		
2.	BAS		ANCE OF MITSUBA GROUP6	
	2.1	CORP	ORATE PHILOSOPHY6	
	2.2	ENVIR	RONMENTAL DECLARATION7	
	2.3	ACTIC	ON GUIDELINE7	
	2.4	MITSU	JBA ENVIRONMENT VISION 20467	
	2.5	CARB	ON NEUTRAL POLICY8	
3.	APP	ROAC	CH TO ENVIRONMENT OF MITSUBA GROUP	
	3.1	ESTA	BLISHMENT OF EMS8	
	3.2	COMP	LIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS	
	3.3	RESP	ONSE TO CLIMATE CHANGE8	
	3.4	RESO	URCE RECYCLING8	
	3.5	SUBS	TANCE OF CONCERN (SOC) MANAGEMENT9	
	3.6	BIODI	VERSITY9	
4.	_	-	F GREEN PROCUREMENT9	
5.	REC	UIRE	MENTS FOR SUPPLIERS10	
	5.1	ESTAI	BLISHMENT OF EMS10	
	5.2	COMP	LIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS	
	5.3	REDU	CTION OF GREENHOUSE GAS EMISSIONS TO ADDRESS CLIMATE	
		CHAN	GE10	
	5.4	PROM	IOTION OF RESOURCE CONSERVATION, RECYCLING AND WASTE	
		REDU	CTION FOR RESOURCE CIRCULATION10	
	5.5	SOC N	MANAGEMENT10	
		5.5.1	INTENDED SCOPE	
		5.5.2	SOC LIST OF MITSUBA11	
		5.5.3	SOC MANAGEMENT SYSTEM12	
	5.6	INVES	TIGATION ON SOC12	
		5.6.1	SUBMISSION OF EVIDENCE12	
		5.6.2	SUBMISSION OF DATA ON CHEMICAL SUBSTANCES CONTAINED IN	
			MATERIALS AND PARTS12	
		5.6.3	SURVEY ON THE USAGE OF SOC13	
	5.7	SUBM	IISSION OF DECLARATION13	

	5.8	BIODIVERSITY	14
6.	AP	PENDICES	14
7.	со	NTACT FOR INQUIRIES	14

# 1. POSITION OF THIS GUIDELINE

MITSUBA Group Green Procurement Guideline clarifies basic approach to environment which is commonly used in MITSUBA Group companies; besides, it explains requirements from MITSUBA Group to suppliers.

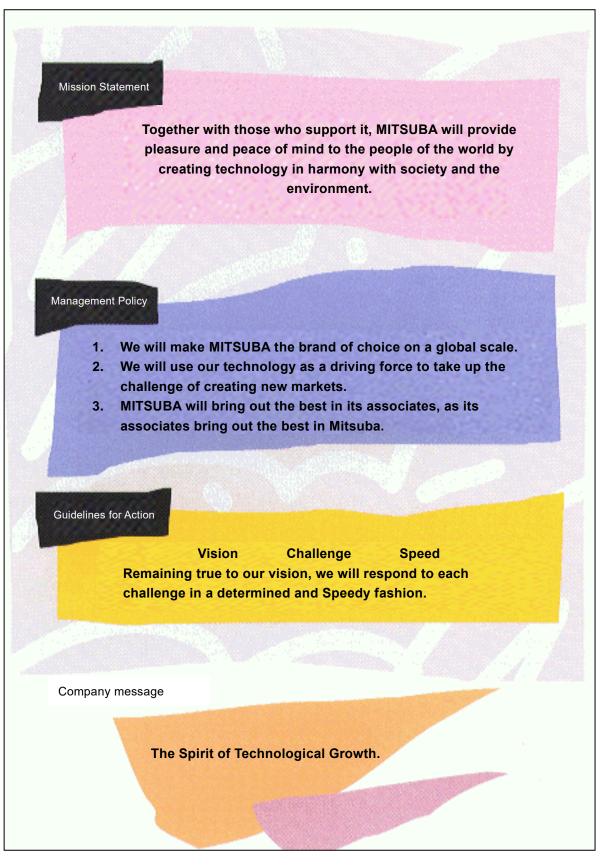
Japan (6 companies)		MITSUBA Corporation
		Tatsumi Corporation
		Higashinihon Diecasting Industry Co., Ltd.
		Momimo Manufacturing Co., Ltd.
		Toyo Electric Manufacturing Co., Ltd.
		Sun-You Corporation
America	U.S.A.	American Mitsuba Corporation.
(5 companies)	Mexico	Corporacion Mitsuba de Mexico, S. A. DE C. V.
		Corporacion Tatsumi de Mexico, S. A. DE C. V.
	Brazil	Mitsuba do Brasil Ltda.
		Mitsuba Autoparts do Brasil Indústria Ltda
Europe / Africa	Italy	Mitsuba Italia S.p.A.
(6 companies)	Hungary	Mitsuba Automotive Systems of Europe Kft.
	France	Mitsuba Manufacturing France S.A.
	Morocco	Mitsuba Manufacturing Morocco
	Russia	Mitsuba Rus LLC
	Turkey	Mitsuba Turkey Otomotiv A.S.
Asia	Philippines	Mitsuba Philippines Corporation
(7 companies)	India	Mitsuba India Private Ltd.
	Vietnam	Mitsuba Vietnam Co., Ltd.
	Indonesia	PT. Mitsuba Indonesia
		PT. Mitsuba Automotive Parts Indonesia
		P.T. Tatsumi Indonesia
	Thailand	Thai Summit Mitsuba Electric Manufacturing Co., Ltd.
China (7 companies	)	Guangzhou Mitsuba Electric Co., Ltd.
		Guangzhou Mitsuba Electric (Wuhan) Co., Ltd.
		Mitsuba Electric (Dalian) Co., Ltd.
		Mitsuba Shihlin Electric (Wuhan) Co., Ltd.
		Mitsuba Automotive Technology (Shanghai) Co., Ltd.
		Mitsuba China (Hong Kong) Ltd.
		Changzhou Shihlin Mitsuba Electric & Engineering Co., Ltd.

For details of MITSUBA Group companies, see the website of MITSUBA Group Corporation.

(https://www.mitsuba.co.jp)

# 2. BASIC STANCE OF MITSUBA GROUP

#### 2.1 CORPORATE PHILOSOPHY



# 2.2 ENVIRONMENTAL DECLARATION

# **Environmental Declaration**

We will work to achieve a continuous harmonization with our natural environment by means of technical developments harmonized with the society and the environment. We will work to realize a safe and plentiful environment for us all.

- \* We strive to conserve resources and energy in all of our corporate activities including development, production, and sales.
- \* We strive to reduce waste and pollutants, and to dispose of these properly.
- \* We strive to keep a safe living environment in harmony with local environments.

# 2.3 ACTION GUIDELINE

The action guideline is a concrete guiding principal to move the "Environmental Declaration" into action.

# **Environmental Action Guideline**

- 1. We will attempt to make sparing and effective use of limited resources.
- 2. We will strive to save on energy in our corporate activities, in order to fulfill our corporate responsibilities with regard to global warming.
- 3. We will strive to find substitutes for ozone destroying substances in order to protect the ozone layer.
- 4. We will manage chemical substances properly and use abolition of harmful chemical substances including not using them for our products.
- 5. We will establish an environmental management system and strive to observe in company regulations that are stricter than public laws.
- 6. We will positively participate in social activities relating to the environment.

# 2.4 MITSUBA ENVIRONMENT VISION 2046

In order to achieve the goal to "realize a safe and plentiful environment" as stated in the "Environmental Declaration," we have set the "MITSUBA Environment Vision" for 2046, which is the 100th anniversary of MITSUBA's founding, as the target year for "improving corporate value" through reduction of CO<sub>2</sub> emissions and resource consumption, and for "protecting the natural environment" by seeking zero environmental pollution risk.

In order to contribute to the realization of a carbon neutral society, MITSUBA Group aims to achieve carbon neutrality from a life cycle perspective.		
2050	Long-term goal: Aiming to achieve carbon neutrality for the entire lifecycle by 2050	
2030	Medium-term goal: Reduce Scope 1 and 2 by 50% by 2030	

#### 3. APPROACH TO ENVIRONMENT OF MITSUBA GROUP

#### 3.1 ESTABLISHMENT OF EMS

MITSUBA Group considers global environmental protection as an important management issue, so that we started establishing EMS: Environmental Management System from 1997 to make continued efforts to reduce environmental burdens. These activities include not only prevention of global warming and natural resources saving with emissions recycling, but also reduction of environmental burdens related to the operation of respective companies and departments.

The perspective of Life Cycle Assessment (LCA) with regard to not only production step but also use and disposal step of the product is crucial to achieve continuous reduction of environmental burdens which is contemplated by ISO14001 Environmental Management System. We will work on this task.

#### 3.2 COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS

MITSUBA Group has positioned its code of conduct as correctly understanding and complying with environmental laws and regulations in each country and region, and we regularly collect legal information and evaluate compliance with those laws and regulations.

#### 3.3 RESPONSE TO CLIMATE CHANGE

In order to contribute to the realization of a carbon neutral society, MITSUBA Group is committed to understanding and reducing CO<sub>2</sub> emissions throughout its entire supply chain. This includes all stages from materials purchasing to the usage of products and shipping of products and parts. Moreover, by conducting analysis based on the TCFD recommendations and proactively incorporating responses to climate change into our management, we aim to support the sustainable development of society, including the MITSUBA Group.

#### 3.4 RESOURCE RECYCLING

In order to promote the formation of a recycling-oriented society and the effective use of limited resources, MITSUBA Group is enhancing activities to improve the yield of raw and auxiliary

materials. Moreover, we will promote activities aimed at forming a "recycling-oriented society" by pursuing the efficient use and recycling of resources from a life cycle perspective.

#### 3.5 SUBSTANCE OF CONCERN (SOC) MANAGEMENT

Since "Agenda 21: Sound Management of Hazardous Chemicals" was adopted by Rio Summit (UN Conference on Environment and Development) in 1992, the management of chemicals (Substance of Concern), whose use in products is restricted by each country's environmental laws and regulations, has been a critical issue of concern around the world. Environmental laws related to automobiles include the "EU ELV Directive 2000/53/EC", "RoHS Directive 2002/95/ EC", "EU REACH regulations EC 1907/2006", and "CSCL (Chemical Substances Control Law)", etc. of Japan. In order to comply with these environmental laws and regulations, MITSUBA Group will focus on the management of SOCs included in our products and the establishment of SOC management system for the whole supply chain.

#### 3.6 **BIODIVERSITY**

Each MITSUBA Group company monitors the surrounding natural environment and actively works on forest maintenance, tree planting, and environmental beautification activities. In order to protect our abundant natural environment, we will actively contribute to its conservation.

# 4. POLICY OF GREEN PROCUREMENT

Previously, we had asked our suppliers for their cooperation on quality, cost, and delivery due date. However, what society is now asking for our products is the reduction in the environmental burdens throughout their life cycles which consist of procurement including supply chain, production, transportation, use and disposal. In concrete terms, chemical management of products, resource savings, energy savings and prevention of environmental pollution. In order to meet these demands, we must also seek your cooperation on environmental consideration (green purchasing), in addition to your ongoing cooperation on quality, cost and delivery due date.

# 5. REQUIREMENTS FOR SUPPLIERS

#### 5.1 ESTABLISHMENT OF EMS

- Establish EMS: Environmental Management System that meets ISO14001 or what is equivalent to the former.
- (2) Acquisition of such certification systems as Eco Action 21, Eco Stage and Environmental Management System Standard (KES), etc. in Japan will also be considered as that Environmental Management System is already built as with the acquisition of ISO14001.
- (3) Likewise, regulations for small and medium scale businesses established in other countries having fewer burdens are acceptable as well.
- (4) Proceed with activities related to environmental conservation in case of not yet being certified. (Development of objective and action plan, role sharing, compliance with regulations, reduction of energy, reduction of waste, management of chemicals, environmental education, audit, etc.) The detail is shown in Appendix 2 "EMS: SELF ASSESSMENT CHECKLIST".

#### 5.2 COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS

Comply with all applicable national and local environmental laws and regulations.

#### 5.3 REDUCTION OF GREENHOUSE GAS EMISSIONS TO ADDRESS CLIMATE CHANGE

Work on understanding and reducing  $CO_2$  emissions from your business activities. As part of our efforts across the entire supply chain to realize a carbon neutral society, we may request you to provide information regarding  $CO_2$  emissions during the manufacture of materials and parts,  $CO_2$  emissions during transportation, and reduction efforts. We appreciate your cooperation in such requests.

# 5.4 PROMOTION OF RESOURCE CONSERVATION, RECYCLING AND WASTE REDUCTION FOR RESOURCE CIRCULATION

Take actions to recycle resources in your business activities. We may request you to provide information regarding material recycling rates and the use of recycled materials. We appreciate your cooperation on such requests.

#### 5.5 SOC MANAGEMENT

#### 5.5.1 INTENDED SCOPE

(1) The SOC management for products applies to all items procured by MITSUBA Group

companies:

- a Materials and parts: Including the ones not for auto parts and samples.
- b Sub materials: Solder, Adhesive, Grease, metal working lubricant, tape, marker, etc.
- c Packing material: Including not only carton but cushioning materials, bands and labels etc.

# 5.5.2 SOC LIST OF MITSUBA

Comply with the laws and regulations specified in the Appendix "SOC List of MITSUBA" of MES A015 "Restricting the use of Substances of Concern for Products".

Table	Class	Description
Table 1	GADSL	List of prohibited and declarable substances created by
	(Global Automotive	Global Automotive Stakeholder Group (GASG) consisting of
	Declarable Substance	automotive manufacturers and their suppliers in Europe, the
	List)	USA, and Japan.
	(including substances	The GADSL is revised on a periodic basis. This guideline
	whose classifications are	shall always refer to the latest version.
	modified by MITSUBA)	Both of the classifications by GADSL and MITSUBA are
		listed in parallel. For details, refer to the GADSL website
		below.
		GADSL URL: https://www.gadsl.org/
		*Not all the substances belonging to each substance group
		are described in this list. Only those whose classifications
		differ from GADSL classifications are included in the list.
Table 2	List of Voluntarily	List of substances that are voluntarily designated as
	Prohibited Substances	"prohibited" at customer's request while they are not listed in
	Not Covered by GADSL	GADSL.
Table 3	Criteria for Packaging	List of restricted substances in packaging materials, etc.*
	Substances	* Parts, items or materials used for packaging, protection,
		transportation, display, etc., that are intended to be removed,
		or that do not affect the use of the product even if removed.
		This includes boxes, tape, cushioning materials, labels, tags,
		etc.
Table 4	Information on Relevant	Legal matters that require consideration of alternative
	Laws and Regulations	technologies.
		* If any applicable substances are contained in a product,
		they must be reported via IMDS.

\* SOC List of MITSUBA consists of Tables 1 to 4 below.

#### 5.5.3 SOC MANAGEMENT SYSTEM

(1) Establish SOC Management System.

(Clarification of role sharing, human development, control criteria, supplier management, parts control, internal audit, etc.)

For further details, please refer to A – M in "4.4.1(2) Requirements for establishing SOC (Substances of Concern) management system" in "Supplier Quality Manual; Requirements (Control No.: D-Q01)."

(2) We may perform an audit of your SOC Management System.

#### 5.6 INVESTIGATION ON SOC

#### 5.6.1 SUBMISSION OF EVIDENCE

- (1) We will request our suppliers to submit some evidence to prove non-inclusion of specified SOC (see Appendix 3), according to the request from our customers or in case that we consider that it is necessary.
- (2) The evidence to prove non-inclusion of SOC is analysis data which indicates that the amount of SOC contained in materials or parts is below the corresponding threshold values stated in the SOC list. Four substances specified in ELV Directive (Pb, Cd, Hg, Cr6+) are subject to this requirement. We will request you to submit the same evidence clarifying a substance name in case of other substances.
- (3) We will make a request on a case-by-case basis if our customer specifies types of analysis equipment, ISO17025 Certification of laboratory, analysis date and language to be used etc.

# 5.6.2 SUBMISSION OF DATA ON CHEMICAL SUBSTANCES CONTAINED IN MATERIALS AND PARTS

- (1) When trading the items defined in 5.5.1(1) a c with MITUSBA Group companies, submit data on the chemical substances contained in materials and parts to be traded (chemical substance data). In particular, if any substances specified in Table 1 (GADSL) of the MITSUBA SOC List (Appendix of MES A015 "Restricting the use of Substances of Concern for Products") are contained above the specified threshold value, report this as chemical substance data, regardless of whether the inclusion is intentional or unintentional.
- (2) Submit the chemical substance data using either the "IMDS (International Material Data System)" or the "JAPIA Standard Material Datasheet." Moreover, when submitting the chemical substance data, please answer whether recycled materials are used. If recycled materials are used, please specify the usage rates of in-process recycled materials (pre-consumer recycled © 2024, MITSUBA Corporation All rights reserved.

materials) and market-collected recycled materials (post-consumer recycled materials).

- (3) If the chemical substance data contains your confidential information, up to 10% of the data may be disclosed as MISC (miscellaneous). In this case, the total of MISC and disclosed ingredients must be 100%. Furthermore, substances specified in Table 1 (GADSL) of the SOC List of MITSUBA of MES A015 "Restricting the use of Substances of Concern for Products" must not be included in MISC.
- (4) If a substance disclosed as MISC becomes a declared substance due to revisions in Table 1 (GADSL) and Table 2 (List of Voluntarily Prohibited Substances Not Covered by GADSL) of the SOC List of MITSUBA of MES A015 "Restricting the use of Substances of Concern for Products", or if there is a change in the inclusion of a declared substance due to a material change, resubmit the chemical substance data.
- (5) The chemical substance data is required for compliance checks with related laws and regulations and information disclosure obligations. We ask for your cooperation in observing the submission schedule. Moreover, since the chemical substance data needs to be collected ultimately from raw material manufacturers throughout the supply chain, we ask that you regularly collect and manage this data on delivered items, regardless of specific reporting requests.

#### 5.6.3 SURVEY ON THE USAGE OF SOC

(1) Due to legislative trends regarding SOC in the countries, we may ask our suppliers for help to do some survey on whether specific SOC is being used or not, based on requirements from customers or at our discretion. In such cases, we will seek our suppliers' support to make inquiries to material suppliers etc.

#### 5.7 SUBMISSION OF DECLARATION

- (1) Regarding "purchased items" that our suppliers obtain from their subcontractors and deliver to us, we will request our suppliers to pledge that they do not contain any prohibited substances as specified in the SOC List of MITSUBA in "MES A015 Restricting the use of Substances of Concern for Products", and that the substances required to be reported are declared if they exceed their threshold values.
- (2) We will request our suppliers to submit "Declaration", according to the request from our customers or in case that we consider that it is necessary.
- (3) Please report using a supporting data: Appendix 1 "DECLARATION OF CONFORMITY TO MITSUBA Engineering Standard MES A 015 "RESTRICTING THE USE OF SOC FOR © 2024, MITSUBA Corporation - All rights reserved.

#### 5.8 **BIODIVERSITY**

We request that you reduce the use and discharge of substances that may have a significant impact on the environment, conserve biodiversity in your business activities, and make effective use of limited resources.

# 6. APPENDICES

- (1) Appendix 1 "DECLARATION OF CONFORMITY TO MES A 015: RESTRICTING THE USE OF SOC FOR PRODUCTS"
- (2) Appendix 2 "EMS SELF-ASSESSMENT CHECKLIST"
- (3) Appendix 3 "GLOSSARY"

MITSUBA Group Green Procurement Guideline is disclosed at the website of MITSUBA Corporation: <u>https://www.mitsuba.co.jp/en/purchase.html</u>

# 7. CONTACT FOR INQUIRIES

Submit inquiries related to this guideline to the contact below in English or Japanese.

Attn: MITSUBA Corporation, Purchasing Planning Section 1, Purchasing Planning Department

E-mail: greenkobai@mitsuba.co.jp

TEL: 0277-52-0171 FAX: 0277-54-6920

Attn: MITSUBA Corporation, Purchasing Dept. (When submitting to MITSUBA Corporation)

# DECLARATION OF CONFORMITY TO MES A 015 "RESTRICTING THE USE OF SOC FOR PRODUCTS"

We will pledge that no chemicals prohibited in the Appendix "SOC List of MITSUBA" of MES A015 "Restricting the use of Substances of Concern for Products" are included in the purchased items (production materials, prototype materials, and packaging materials) which we are currently delivering and will deliver in the future, and that we declare the quantity of the substances required to be reported when the quantity we use exceeds the threshold.

We also pledge to observe this guideline as to prohibited substances and substances required to be reported which will be added in the future GADSL revision.

Fill out date

Supplier name

Name of person in charge

Signature

# Appendix 2\_EMS SELF-ASSESSMENT CHECKLIST

(Please fill out below in the case of not being certified according to ISO14001 or equivalent.)

Nº	Item	ISO requirements (Reference)	Evaluation criteria	Eval.
1	Environmental policy	Environmental policy (5.2)	<ol> <li>There is a company philosophy regarding environmental conservation.</li> <li>Policy on environmental conservation is already established and it is pledged on continuous improvement and pollution prevention.</li> <li>It is pledged on observation of environmental laws and regulations through environmental policy.</li> <li>Environmental policy is documented, communicated to all the employees and accessible to the third party.</li> </ol>	
2	Plant / Organization	Objective, Target and Action plan (6.2 Environmental goals and plans to achieve them)	<ol> <li>There are objectives as well as targets to achieve policy.</li> <li>Organization and person in charge are clearly identified to achieve objective and target</li> <li>There is an action plan in which means and method to achieve objective and target are identified.</li> </ol>	
3	Environmental impact assessment / Operation and maintenance control	Environmental aspects (6.1.2) Operational Planning and Control (8.1) Monitoring, Measurement, Analysis and Evaluation (9.1)	<ul> <li>1) Impact by business activities on the following items are evaluated and identified; efforts for improvement are being made.</li> <li>(1) Air pollution</li> <li>(2) Water pollution</li> <li>(3) Noise / Vibration</li> <li>(4) SOC (see MES A 015 "Restricting the use of Substances of Concern for Products".)</li> <li>(5) Wastes</li> <li>(6) Energy (Amount consumed of Electricity/Gas/Fuel etc.)</li> <li>2) Supervisor is designated for specified phenomenon (including machines/operation) control is in place.</li> <li>3) There is a product assessment mechanism to provide with environmentally friendly products</li> </ul>	
4	Compliance	Compliance obligations (6.1.3) Compliance evaluation (9.1.2)	<ol> <li>Acts/codes and industry norms etc. related to the environment are identified; control is in place</li> <li>There is adequate control over facilities/ equipment regarding related environmental laws.</li> </ol>	
5	Risk management	Emergency Preparedness and Response (8.2)	1) Emergency response on environmental conservation is well prepared having established procedure	
6	Enlightenment / Disclosure of information	Competence,7.2 Communication (7.4)	<ol> <li>Training programs necessary for personnel within the system are identified and being implemented to achieve her/his objective.</li> <li>Training programs especially for those who involve in some operations causing huge impact on environment are being implemented; a list of those operators is available.</li> <li>Information on environmental conservation of the company is being disclosed.</li> </ol>	
7	Response to non- conformity	Non-conformity and corrective action (10.2)	1) Procedures to implement corrective/preventive actions in case of non-conformity on Environmental Management System are already established.	

8	Self- evaluation	Internal Audit (9.2) Management Review (9.3)	<ol> <li>Self-evaluation on progress status of plan as well as achievement status of objective are being implemented; evaluation results are reported to directors.</li> <li>Self-evaluation results are reflected in environmental policy, plan and organization for continuous improvement.</li> </ol>	
9	Documents control	Documents (7.5)	1) Responsibility and procedures to implement previous questions are determined and documented.	

Note) Fill out in the evaluation section. (Y: Yes, N: No, n/a: Not Applicable)

#### **APPENDIX 3\_GLOSSARY**

#### 1. Chemical Substance Data

(1) Chemical substance data refers to information on the chemical components of materials and

parts used.

Case 1. Standard components of cold rolled steel plate (SPCC)

Component	CAS No.	Content percentage (%)
Iron	7439-89-6	99.55
Manganese	7439-96-5	0.30
Carbon	7440-44-0	0.075
Phosphorus	7723-14-0	0.050
Sulphur	7704-34-9	0.025

Case 2. Component example of PET resin including 20% of glass

Component	CAS No.	Content percentage (%)
Polyethylene Terephthalate	25038-59-9	71
GF-Fiber	-	20
Misc., not to declare	system	9

- (2) SOC data requires parts mass, percentage of recycled material used, and material identification etc. as well as information specified above.
- (3) Chemical substance data is an ingredient specification of material. Please make inquiries to material manufacturers.
- (4) Some material ingredient is prohibited to use or required to be reported when used.
- (5) It is permitted not to disclose up to 10% of constituents treating it as MISC (others) in case you cannot give full disclosure for confidentiality reasons. In such case, the grand total should be 100% summing MISC and disclosed part up.

Also note that MISC should not include prohibited substances and substances required to be reported which are stipulated in GADSL.

# 2. GADSL

(1) GADSL (Global Automotive Declarable Substance List) refers to the controlled chemicals list that is commonly used across industries and that was established by auto manufacturers, auto components suppliers and chemical manufacturers. <u>https://www.gadsl.org/</u> Chemicals included in GADSL are classified into three categories:

- P (Prohibited): Impossible to use in over threshold level or intentional.

- D (Declarable): Possible to use; but required to be reported if they exceed their threshold values.

- D/P (Declarable/Prohibited): It depends on the chemical or the purpose.

For example, asbestos is completely prohibited (category P) and lead is prohibited except for certain purposes such as for batteries (category D/P).

# 3. IMDS

- (1) IMDS is a system for efficiently collecting chemical substance data. This system collects information on the materials and chemical substances contained in approximately 30,000 parts that make up an automobile throughout the supply chain in order to comply with EU ELV Directive, which includes regulations on environmentally hazardous substances in new vehicles, end-of-life vehicles, and recycling rates. <u>https://www.mdsystem.com/</u>
- (2) To connect to IMDS, you will need to register a company ID.

# 4. JAPIA Standard Material Datasheet

- JAPIA Standard Material Datasheet having the same purpose as IMDS, is agreed by Japan Auto Parts Industries Association (JAPIA). <u>https://www.japia.or.jp/</u>
- (2) Please download and use the latest version of the JAPIA Standard Material Datasheet from the JAPIA website.

# 5. Evidence to prove non-inclusion of SOC

- (1) The evidence to prove non-inclusion of SOC is an analysis result on SOC included in material. SOC usually means such substances as regulated by EU ELV Directive, which include Lead, Cadmium, Mercury and Hexavalent chromium. Some clients have also added PBB and PBDE among Bromine containing fire retarding materials which are regulated by EU RoHS, or specific phthalates (DEHP, DBP, BBP, DiBP).
- (2) The Safety Data Sheet (SDS) is an instruction manual for users who actually handle those materials, and is inadequate as evidence of non-inclusion because the components are only roughly described. In addition, the MIL sheet is also inadequate as evidence of non-inclusion since it does not provide an analysis result that proves the absence of Lead or Cadmium.

#### 6. FYI: Examples of past SOC issues

- (1) The material used contained the prohibited substances in the SOC List of MITSUBA of "MES A015 Restricting the use of Substances of Concern for Products."
- (2) Service parts containing Hexavalent chromium were mistakenly used in mass-produced © 2024, MITSUBA Corporation All rights reserved.

products.

- (3) Lead-containing solder was used in applications that do not fall under specific exemptions.
- (4) The deadline for submitting a report on data on chemical substances contained in materials and parts was missed, causing a delay in the product launch.

	Revision History				
Version	Prepared/ Revised Date	Description			
4.1	2020.10	<ul> <li>Revise the table of MITSUBA Group companies.</li> </ul>			
5	2024.8	<ul> <li>Change the name of the guideline to "Mitsuba Group Green Procurement Guideline."</li> <li>Add sections "2.4 Mitsuba Environmental Vision 2046," "2.5 Carbon Neutral Policy," "3.2 Compliance with Environmental Laws and Regulations," "3.3 Response to Climate Change," "3.4 Resource Recycling," "3.6 Biodiversity," "5.2 Compliance with Environmental Laws and Regulations," "5.3 Reduction of Greenhouse Gas Emissions to Address Climate Change," "5.4 Promotion of Resource Conservation, Recycling and Waste Reduction for Resource Circulation," and "5.8 Biodiversity."</li> <li>Change the reference in 5.5.3(1) from "Appendix 3" to "Supplier Quality Manual; Requirement(Control No. D-Q01)."</li> <li>Add precautions for using recycled materials in 5.6.2(2).</li> <li>Delete "Appendix 3 'Environmental Load Substance Management System Requirements."</li> </ul>			