Green Procurement Guideline

SINFONIA TECHNOLOGY CO., LTD.

(Edition 14)

SINFONIA TECHNOLOGY CO., LTD.

Revised on : August 1, 2026

Preface

The environmental preservation of global scale is a common desire of all over the world. The role of industries related to the environmental preservation has been becoming increasingly important.
Upholding “making action in consideration of environment at every corporate activity in order to reproduce the irreplaceable global environment in healthy state in the next generation not only at the present but in the future to contribute to create a society that comfortable to live in” as the environmental philosophy, SINFONIA TECHNOLOGY CO.,LTD. (hereinafter “SINFONIA”) is carrying out the activities in development and production based on this philosophy.
From this view point, SINFONIA is promoting procurement of low environmental load parts and materials for production, and making effort to reduce environmental load as the result of industrial activities as development, production and etc. (Green procurement)

In order to obtain a substantial result from this activity, cooperation of every supplier is absolutely necessary, by procuring low environmental load parts and materials. SINFONIA intends to expand a good relationship with our suppliers as a partner by forming a supply chain and working together toward to reducing environmental load and risk.

Centered in Europe, the laws and regulations concerning particular chemical substances included in products have been reinforced, customers request to suppliers “the products not including harmful material”, that has become absolute necessary to exclude “particular chemical substance” included in every part which composes the SINFONIA products. Based on this understanding, this is a definitive intention of SINFONIA that to apply this guideline for all procurement items.

It shall be essential to obtain the support and cooperation by suppliers to achieve our activities to comply with the applicable laws and regulations. Therefore, understanding and cooperation by suppliers is highly appreciated. We do hope to establish and maintain a longstanding business relationship with our suppliers through this activity and working together to achieve a respective responsibility for the environmental preservation.

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Basic Environment Policy of SINFONIA TECHNOLOGY CO.,LTD.

＜Philosophy for environment＞

SINFONIA recognizes the effort for the global environmental preservation including responding to climate changes is one of the most important management task and we have a philosophy that aiming “making action with consideration of environment at every corporate activity in order to reproduce the irreplaceable global environment in healthy state not only at the present but in the future also to bring a comfortable society to live in to the future generations.

＜Action guidelines for environment preservation＞

1. By evaluating adverse effect to environment caused by industrial activities for products and services, SINFONIA copes with each materiality for environmental preservation as far as they are technically and economically possible.
2. In order to keep improving the environmental management system, SINFONIA reviews the system as necessarily and also takes the actions for prevention and protection of even potential environmental contamination issued by industrial activities.
3. SINFONIA takes all necessary actions to comply with the applicable laws and regulations and also any other requirements that we would particularly have agreed with outside parties.
4. SINFONIA pursues the following tasks as an important management task.
   (1) Environment-oriented development and manufacturing.
   (2) Environmental conservation activities aimed at decarbonized society, recycling-oriented society, and conservation of biodiversity
   (3) Control of the chemical substances in question and promotion of green procurement
   (4) Taking precautionary and preventive actions for issuing pollutions.
   (5) Contributing to the community through environment conservation activities.
5. Based on the lifecycle viewpoint, SINFONIA is making continuous efforts in development of technologies which contribute to reduce the environmental load in all aspects of industrial activity such as design and manufacturing, packaging and shipping, installation and operation, and also scrapping and disposing.

＜Environmental statement＞

Under the environmental statement of SINFONIA that is symbolically expressed as “ECOing™ (Going with Ecology), the company is making a contentious effort to prevent from a global warming by realizing earth-friendly and recycling-oriented society. We, therefore, take precedence on environment-oriented technologies in our both development and production activities as much as possible.

Green Procurement Guideline of SINFONIA TECHNOLOGY CO., LTD.

1. Purpose

This "Green Procurement Guideline" describes the standards of procurement administration of the in-coming materials, parts, products and etc. from suppliers.

The purpose of this guideline is to share all relating information with our suppliers in order to work together toward compliance with all applicable laws and regulations relating to the environmental preservation in the countries where our products are demanded. And the ultimate purpose of this activity is to contribute, through low environmental load products and services, to realize a recycle-oriented economic society throughout the international community.

2. Physical actions

(1) Chemical substances managed at SINFONIA are classified in 3 categories. i.e.– "unconditionally "prohibited substances (Level 1)" , "conditionally prohibited substances (Level 2) and "managed substances" according to the guideline of JAMP (Joint Article Management Promotion consortium), SINFONIA is obliged itself to comply with RoHS Directive, REACH Regulation, Industrial Safety and Health Act, Chemical Substances Control Law (CSCL), Law on the Prohibition of Chemical Weapons and Regulations of Specific Chemicals and other legal controls worldwide.

(2) In accordance with RoHS Directive, REACH Regulation, Industrial Safety and Health Act, CSCL and etc., SINFONIA performs a voluntary disclosure of the information with respect to chemical substances included in its products under the cooperation of the corresponding suppliers to respond to requirement of smooth communication among our supply chain.

(3) SINFONIA subcontracts the suppliers based on the assumption that all subcontractors are capable of complying with all environmental relating laws and regulations and takes precedence in procurement from the supplier who is positively making efforts for environmental preservation on such supplier for selection.

(4) SINFONIA handles with procurement articles by classifying into the following 3 Categories.

①Components of the products

All procurement hardware (products, parts and materials) which are to be a part of the products to be sold by SINFONIA.SINFONIA determines evaluation items of procurement hardware related to reduction of environmental load, and selects procurement hardware having low environmental load.

②Production facilities and indirect materials

Facilities, tools, jigs and indirect materials (paint, plating solution, detergent and packing material), SINFONIA rather selects hardware which has a low environmental load capability.

③Stationary and office supplies

In regard to stationery, writing materials, document files and etc., SINFONIA makes efforts to extend procurement for environment(friendly) office equipment and supplies, in order to enhance environmental consciousness of employees.

3. Scope of Applicability

This guideline is applicable to all of the procurement hardware such as parts, materials (including the indirect materials that are incorporated in a final product and supplied to a market place automatically as a component) and likewise which are finally incorporated in the products of SINFONIA.

In case of any specification requirement for parts/materials submitted in the purchase order of SINFONIA is somewhat conflict with this guideline in terms of prohibited chemical substances, threshold and delivery conditions, such discrepancies shall be duly defined in a separate procurement specification in order to convene a separate discussion between the supplier and a SINFONIA procurement department in charge to explore a mutually agreeable solution.

4. Supplier Evaluation and Selection Criteria

SINFONIA evaluates and selects suppliers from two(2) aspects of criteria in view of Green procurement as set forth below. In view of this, we put a higher priority on those suppliers who understand our environmental philosophy and work positively with us in line with this guideline in the course of evaluating and selecting suppliers.

4.1 Evaluation and Supplier selection criteria

(1) Environmental preservation actions

① Obtaining environmental management certificate(ISO14001). And declaration environment friendly organization.

②Making the following efforts regarding environmental preservation.

a. Including the environmental preservation activity and goal in a written corporate plan.

b. Establishing the organization and formation to promote environmental preservation activity under the corporate plan.

c. Complying with environmental related laws and regulations.

d. Conducting the education and enlightenment programs regarding environmental preservation to all employees.

e. Pursuing simplified production and logistic systems as much as possible.

f. Making the effort of the limited use of packing and packaging materials.

(2) Establishing a certain management system to ensure the products without prohibited chemical substances.

①Establishing and maintaining the system and organization which does not allow manufacturing and selling the products, and even piece parts, including a harmful chemical substance. throughout the entire process of manufacturing, assembling and shipping.

②Obtaining all available information concerning chemical substance inclusive materials when it is necessary, and keep such information under organizational control.

③Assigning an individual personnel under the chemical substances management system who is responsible for conducts the education and enlightenment programs concerning harmful chemical substance to all employees and also subcontractor personnel in charge.

(3) Compliance with the environmental related laws and regulations

As the result of establishment and practical operation of the environmental management task required in the above, SINFONIA extracts and arranges each and every legal control concerning to respective customers without fail to confirm the applicable legal requirements, and also monitors, measures and evaluates the conformity to the corresponding laws and regulations as necessarily.

4.2 Evaluation and selection criteria for procurement parts and materials

4.2.1 Procurement hardware of parts and materials for SINFONIA products

(1) Categories of chemical substances

Chemical substances contained in parts and materials are defined in the following sections.

Provided, exemptional substances defined in Annex to RoHS Directive shall be excluded. In case that customer designates prohibited substances, there is a case to add prohibited substances.

①Prohibited substances

Intentional addition of prohibited substances is not allowed in procurement hardware. Both of Level 1 and 2 categories shall be prohibited immediately.

②Managed substances

The Management Substances include any substances which are considerably harmful for human health and safety, and they need to be handled with extreme care under a severe management including their inventory status. The fact of this may require suppliers to submit a report detailing their usage, incorporation and thickness of the said substances where it is applicable.

Table 1－1－1　Prohibited substances (Level 1)

Category		Chemical substance	Threshold level Note1	Prohibited
Prohibited Substance	Prohibited Substance Level 1 (24substance Group)	Tributyl tin oxide (TBTO)	No intentional use (addition) is allowed Note2	Immediately
		Tributyl tin (TBT) and Triphenyl tin (TPT) compounds	Less than 1,000 ppm at the weight ratio of tin. Note1	
		Polychlorinated biphenyls (PCBs)	No intentional use (addition) is allowed Note2	
		Polychlorinated naphthalenes (more than 2 chlorine atoms)	No intentional use (addition) is allowed Note2	
		Perfiuoro (octane -1 – sulfonic acid) (PFOS) and its salts and Perfluorooctanesulfonyl fluoride (PFOSF)	No intentional use (addition) is allowed Note2	
		Perfluorooctanoic acid (PFOA) and its salts and PFOA-related substances	No intentional use (addition) is allowed Note2	
		Phenol,2-(2H-1,2,3-benzotriazol-2-yl)-4,6-bis(1,1-di methylethyl)	No intentional use (addition) is allowed Note2	
		Hexabromocyclododecane (HBCD or HBCDD) and Specified chemical substances under　CSCL Class 1	No intentional use (addition) is allowed Note2	
		Asbestos and other product prohibition substances under Article 55 of Industrial Safety and Health Act, and also specified substances by Law on the Prohibition of Chemical Weapons and the Regulation of Specific Chemicals	No intentional use (addition) is allowed Note2	
		Short-chain chlorinated paraffins (with a carbon chain length of between 10 and 13)	No intentional use (addition) is allowed Note2	
		Polychlorinated terphenyls (PCTs)	No intentional use (addition) is allowed Note2	
		Azocolourants and azodyes which form a specific aromatic amines	Less than 30 ppm as specific amines Note1	
		Ozone depleting substance (CFCs, HBFCs, HCFCs Note3, Carbon tetrachloride, etc.)	No intentional use (addition) is allowed Note2	
		Fluorinated greenhouse gases (PFC,SF6)	No intentional use (addition) is allowed Note2	
		Radioactive substances (Group)	No intentional use (addition) is allowed Note2	
		Phenol, Isopropylated Phosphate (3:1) (PIP (3:1))	No intentional use (addition) is allowed Note2	
		Decabromodiphenyl ether（DecaBDE）	No intentional use (addition) is allowed Note2	
		Hexachlorobutadiene（HCBD）	No intentional use (addition) is allowed Note2	
		2,4,6-Tris（tert-butyl）phenol（2,4,6-TTBP）	No intentional use (addition) is allowed Note2	
		Pentachlorothiophenol（PCTP）	No intentional use (addition) is allowed Note2	
		Dechlorane Plus	No intentional use (addition) is allowed Note2	
		Perfluorohexanesulfonic acid (PFHxS) and its salts and PFHxS-related substances	No intentional use (addition) is allowed Note2	
		Long-chain perfluorocarboxylic acids (LC-PFCAs) and its salts and LC-PFCAs-related substances	No intentional use (addition) is allowed Note2	
		Medium-chain chlorinated paraffins (with a carbon chain length of between 14 and 17)	No intentional use (addition) is allowed Note2	

Note1 Threshold level is the amount of impurity contained during the production lines or other situation. Depending upon our customer requirement, there may be a case that SINFONIA asks a separate request which requires more severe threshold level than this table.

Note2 “Intentional use/addition” means; applying the designated substances continuously for forming a product in order to implement specific characteristics, appearance, quality and etc. In principle, SINFONIA prohibits such behavior by anyone including suppliers.

Note3 As long as the applications for a refrigerant of freezing or air conditioning equipment and a washing agent of sealed washing equipment for business use these substances shall be excluded from using these prohibited substances.

* Chemical Substances Control Law (CSCL)
*Industrial Safety and Health Act
*:Law on the prohibition of Chemical Weapons and the Regulation of Specific Chemicals

Table 1－1－2　Prohibited substances (Level 2)

Category		Chemical substance	Threshold level Note1	Prohibited
(Prohibited Substances under RoHS Directive)				
Prohibited Substance	Prohibited Substance Level 2 (10 substance Group)	Cadmium and its compounds Note 5	100ppm Note 3 5 ppm(only for batteries)	Immediately
		Hexavalent Chromium compounds Note 5	1,000ppm Note 3	
		Lead and its compounds Note 5	1,000ppm Note 3 300ppm(only for vinyl chloride cable surface coating) 40ppm(only for batteries)	
		Mercury and its compounds Note 5	1000ppm Note 3 1ppm(only for batteries)	
		Heavy metals contained in packaging materials Total amount of lead, cadmium, mercury and/or hexavalent chromium Note 4	100 ppm Note 3 Intentional use or addition is prohibited Note 2	
		Polybrominated Biphenyls (PBBs) Note 5	1,000 ppm Note 3	
		Polybrominated Diphenyl Ethers (PBDEs) Note 5	1,000 ppm Note 3	
		Bis phthalate (2-ethylhexyl) (DEHP) Note 5	1,000 ppm Note 3	
		Butyl benzyl phthalate (BBP) Note 5	1,000 ppm Note 3	
		Di-n-butyl phthalate (DBP) Note 5	1,000 ppm Note 3	
		Disobutyl phthalate (DIBP) Note 5	1,000 ppm Note 3	

Note1: Threshold level is the amount of impurity contained during the production lines or other situation. Depending upon our customer requirement, there may be a case that SINFONIA asks a separate request which requires more severe threshold level than this table.

Note 2: “Intentional use/addition” means; applying the designated substances continuously for forming a product in order to implement specific characteristics, appearance, quality and etc.

Note 3: Unless otherwise stated, allowable threshold 100/300/1000 ppm are weight base at the homogeneous material level, and is shown as 0.01/0.03/0.1%wt.The term “homogeneous material” means a unit material that cannot be mechanically disjointed into different materials, defined by European committee.

Note 4: For packing materials, exceeding 100ppm of total amount of heavy metal (lead, cadmium, mercury and hexavalent chromium) are prohibited.

Note 5: Exempted substances listed on Annex to RoHS Directive are excluded.

Table 1－2 Managed substances

The intentional use of the managed substances is not restricted to use, but their use and concentration degree must be monitored. With respect to the managed substances, when they are used “intentionally” or “inclusion is known”, such substances need to be identified. In this case, the words “inclusion is known” refer to either “information that has been received from the material manufacturer indicating that the raw material contains the managed substances” or “data indicating that inclusion of the managed substances” has been confirmed by some other means”.

The managed substances in this guideline are applicable to the substances listed in the applicable laws and regulations, industry standards etc. shown in table below. These substances are equivalent to the applicable substances in the “chemSHERPA Declarable Substances Ver. (latest version)” specified by the Joint Article Management Promotion Consortium (JAMP) excluding the prohibited substances (partially excluded) specified by this guideline.

Legal control, industry standards etc. applicable to the managed substances	
Applicable regulations	Scope
(JP) Chemical Substances Control Law： Class I Specified Chemical Substances	
(US) Toxic Substances Control Act (TSCA)：Section 6	40 CFR 763
(EU) Directive 2000/53/EC (ELV)：Targeted substances	2000/53/EC
(EU) 2011/65/EU (RoHS)：Annex II	(EU)2015/863
(EU) 2019/1021 (POPs)：Annex I	(EU)2025/1930
(EU) REACH (No 1907/2006)：The Candidate List of Substances of SVHC, Annex XIV Authrisation Substances	C: 2026-02-04 A:(EU) 2022/586
(EU) REACH (No 1907/2006)：Annex XVII Restriction substances	(EU) 2025/1988
(EU) Medical Devices Regulation (MDR) (EU)2017/745：Annex I 10.4 Substances	CLP:(EU) 2025/1222 SVHC: 2026-02-04 BPR:-
(CN) Administrative Measures for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products	2016-07-01 GB 26572-2025
Global Automotive Declarable Substance List (GADSL)	2025 GADSL Reference List Version 1.1
IEC 62474 DB Declarable substance groups and declarable substances	IEC62474 D32.00

(2) Your answer to the questionnaire about chemical substance included in products

We extend survey in regard to chemical substances included in materials and parts used in production process to our suppliers too. Suppliers, therefore, are sure to be requested to provide us with the answer to the questionnaire.

Applicable chemical substances are shown by Tables 1-1-1 and 1-1-2 Note1. Survey uses the forms of either of Separate sheet 3, 4 attached hereto or check list or chemSHERPA-AI/CI Note2 .

In addition, if your answer suggests the inclusion of chemSHERPA-AI/CINote2, it is mandatory required to attach a supplemental information on both component and law observance.

Note1, Applicable chemical substances are the defined substances in "REACH Regulation Candidate substances for authorization" (Substances of Very Highly Concern (SVHC), and the substances described in the list of "IEC 62474 Declarable substance group and declarable substance and reference substances".

Note2, chemSHERPA-AI (Article Information: molded product data) is a JAMP recommended basic information transfer sheet to notify chemical substance included in the products. The information of chemical substances contained in the molded products shall include the component information of inclusion of management substances and the information to judge such legality.

chemSHERPA-CI (Chemical Information: chemical data) is a JAMP recommended basic information transfer sheet to notify chemical substance contained in the products. The information of chemical substances included in the chemical products shall include the component information of contained management substances.

(3) Submittal of Non-inclusive Guarantee Certificate for particular chemical substances contained in the raw materials and/or parts.

Suppliers are requested to confirm non-inclusive guarantee certificate for the prohibited substances designated by SINFONIA or its customer, and submit "Non-inclusive certificate of particular chemical substance (separate sheet 5)" with signing by duly authorized representative.

(4) Change Proposal for Alternative/New parts and Process

In case of procurement hardware include particular chemical substances designated by SINFONIA and its customer, please propose SINFONIA the alternative one and substitution plan by submitting "Proposal to use alternative, new component and process change (separate sheet 6)". And also, please advise us if any changes in delivery due or process is required caused by such substitution.

(5) Selection of outsourcing items by taking a law environmental load measure into the account

This is definitive intention of SINFONIA to put the first priority on candidate suppliers who is making the following efforts to reduce the environmental load:.

①Utilizing recycling resources positively

②Measure taken toward downsizing, weight saving and/or long life of parts and products.

③Measure taken toward resource saving, energy saving

④Recycling design is applied and easy to disassemble, classification waste dumping.

⑤Applicable to the environmental labeling (Types I, II and IIINote3)

⑥Disclosing the environmental information on its products to the public.

⑦Implementing of product assessment

Note3, Definition of environmental labeling is based on ISO14020,14021,14024,14025.

The environmental labeling comprises with the following 3 types:

- Type I environmental labeling

  Third party determines criteria to environmentally provided products. Labeling showing, as a result of audit, it's certified. In Japan, there is "Eco mark" etc.
- Type II environmental labeling

  Label shows that a corporation declares environmental compliance of products.
- Type III environmental labeling

  This is different from Type I and II. There is no criteria, environmental load is evaluated by LCA and a label showing that third party audited and certified. In Japan, there is "Eco leaf environmental label, etc".

4.2.2 Procurement of indirect materials and likewise related to production activity

(1) Indirect materials and likewise to be used in production activity

Indirect materials and likewise must not include prohibited substances shown in Table 1-1-1 and 1-1-2. Whenever a new indirect material is introduced, submit SDS[Note4] and if possible, chemSHERPA-AI/CI and/or a material certificate and likewise to SINFONIA.

(2) Request for the answer to the questionnaire about included chemical substance

SINFONIA sometimes makes survey similar to 4.2.1 "Procurement hardware of parts and materials related to products" regarding included chemical substance in indirect materials and likewise. Please answer to the questionnaire upon requested.

Note4, "SDS" stands for "Safety Data Sheet"

4.2.3 Procurement of office use goods such as stationary etc

(1) Green purchase

SINFONIA also extends this Green Procurement campaign to stationaries and other office goods and equipment too and we apply the same efforts as described in Section 4.2.1(5) to such items.

5. Guidelines of Green procurement surveys

5.1 Process of Green procurement survey

To survey the parts and materials used by supplier pursuant to the abovementioned requirements, SINFONIA uses the forms ① through ⑥ listed in the table in Section 5.2.

Please answer the result of survey from supplier. Regarding results of procurement hardware survey, suppliers shall extend a survey to its subcontractors as necessarily, and report its result to SINFONIA as well. According to such reports, SINFONIA shall conduct a physical audit when it is necessary.

5.2 Documents to be submitted for Green procurement survey

No.	Document to submit, contracted items	Form
①	Survey sheet for efforts related to Environmental preservation activity	Separate sheet 1
②	Memorandum of Understanding(MOU) regarding Green procurement	Separate sheet 2
③	Chemical substances included in Products	Separate sheet 3
④	In-process chemical substances	Separate sheet 4
⑤	Certificate of non inclusive particular chemical substances	Separate sheet 5
⑥	Proposal for Alternative, New parts and Process change	Separate sheet 6

①Survey sheet concerning Environmental preservation activity

All suppliers including trading company and distributor are requested to answer for building process situation to ensure obtaining certificate of environmental preservation system and control against included chemical substances. Please submit answer by using “Survey sheet for efforts to environmental preservation activity (Separate sheet 1)” form.

②Memorandum of Understanding(MOU) regarding Green procurement

SINFONIA requires supplier to execute “Memorandum of Understanding for green procurement (Separate sheet2)” between our two parties, in which describes a commitment to supply environmentally friendly products, parts and raw materials.

③Survey sheet concerning chemical substances included in Products

Submit survey sheet of either “Chemical substances included in Products (Separate sheet 3)” or chemSHERPA-AI/CI. This survey is, in principle, a survey via electronic data, and consists of basic information regarding parts, materials and survey for included chemical substance.

In principle, this requirement shall be extended even to the supplier who is a trade company or a distributor.

④Survey sheet concerning in-process chemical substances

Please answer by using either “In-process chemical substances(Separate sheet4)” or chemSHERPA-AI/CI.

⑤Certificate of non inclusive particular chemical substances

For the materials, parts which were declared as “the prohibited substances defined in Table 1-1-1 (Level 1) included in products survey sheet) is not included”, supplier must submit “Certificate of non inclusive particular chemical substances(Separate sheet 5)” for all parts and materials.

Also in case of RoHS Directive is applied to the corresponding SINFONIA products, supplier must

submit “Certificate of non inclusive substances under RoHS Directive and etc.(Separate sheet 5b)” when supplier declared “the conditional prohibited substances defined in Table 1-1-2 (Level 2) in product survey sheet” is not included.

However, in case of the substance in use corresponds to an exempted substances designated in Annex to RoHS Directive, or to the exempted application such as washing agent or refrigerant, supplier has to so express on the survey sheet. Nevertheless, if non inclusion is hard to avoid, notify SINFONIA detailed situation for prior discussion on a possible solution.

⑥Proposal for Alternative, New parts and Process change

In case of alternative materials and parts or change in manufacturing process are intended to apply to the product currently supplied to SINFONIA, or any change in inclusion condition of the prohibited and/or managed substances which are already contained in the supplier product of the same, supplier is requested to submit “Proposal for Alternative, New parts and Process change (Separate sheet 6)” without fail.

6. Contact Us

SINFONIA TECHNOLOGY CO., LTD. (Call from foreign country)

Toyohashi Procurement Dept.

Tel:(+81) 532-41-3131 FAX(+81) 532-41-6432

Ise Procurement Dept.

Tel:(+81) 596-36-2201 FAX(+81) 596-36-0355

Environmental Preservation Section (Toyohashi Plant)

E-mail: env-info@sinfo-t.jp

Tel:(+81) 532-41-2211 FAX(+81) 532-41-2179

Environmental Preservation Section (Ise Plant)

Tel:(+81) 596-36-1148 FAX(+81) 596-36-0577

ATTN Procurement Department ,SINFONIA TECHNOLOGY CO., LTD.

Date:

Survey sheet for efforts related to Environmental preservation activity

Name of company
Section, Job title
Name (signature)
Address
Tel. No.
FAX No.
E-mail
Supplier code

The report of efforts for environmental preservation activity in our company is as follows.

1-1 Certificate of environmental management, obtained (Check mark in bracket)
☐ Certified according to ISO 14001 from third party Date certified . , 20XX Certification body Identification No. ☐ Planning to obtain ISO14001 certificate Estimated date certified , 20XX Certification body ☐ Not planned yet for ISO14001 or third party for certification

1-2 Building a system to ensure control of included chemical substances		
①	Through all process from manufacturing to shipment, building a system not to make and sell parts, products including harmful chemical substance, are you always making efforts to maintain and improve? *** In case of currently building, indicate schedule to complete.**	☐ Yes ☐ No Approx. .20XX
②	Have you already built system to obtain inclusive information of chemical substance at necessary timing and control its information?	☐ Yes ☐ No
③	Has each responsible person in control framework for included chemical substance been decided?	☐ Yes ☐ No
④	Is your company providing education and enlightenment program related to included chemical substance to employees and persons in charge?	☐ Yes ☐ No
⑤	Regarding system to ensure control for chemical substance included, has your company documented it? ***If already documented, please submit that separately.**	☐ Yes ☐ No

1-3 Compliance with Environmental related Laws and Regulations		
①	Do you monitor/measure your environmental preservation activity in light of the applicable environmental laws and regulations that have been extracted and instrumentalized by EMS and etc. as necessarily, and reconfirm and evaluate its conformity with such laws and regulations?	☐ Yes ☐ No

Memorandum of Understanding (MOU) regarding Green procurement

SINFONIA TECHNOLOGY CO., LTD. (hereinafter called SINFONIA) and (hereinafter called Supplier) has agreed, as follows, to apply " SINFONIA TECHNOLOGY CO., LTD. Green procurement guideline" (hereinafter called this Guideline) set up by SINFONIA for all business deal (hereinafter called this transaction) based upon Basic agreement for business deal (hereinafter called Original agreement) dated on mm dd, yyyy entered into a contract between SINFONIA and Supplier.

Article 1 (Scope)

This guideline shall be applied to all products, parts, materials (hereinafter called this procurement goods) procured by SINFONIA from Supplier based on this transaction.

Article 2 (Compliance with this guideline)

Supplier must deliver this procurement goods to SINFONIA in compliance with this guideline, unless otherwise particular instructions from SINFONIA. In case that Supplier, however, has justifiable reason or inevitable reason not to be able to comply with this guideline, Supplier notifies SINFONIA its reason by a written notice in advance. When SINFONIA acknowledge its reason, SINFONIA can give Supplier specification change or other particular instructions according to discussion with Supplier.

Article 3 (Revision of this guideline)

SINFONIA can revise contents of this guideline in accordance with revision of relative laws and regulations, change of economical circumstances and other necessary reason, and revised guideline also works as this guideline in this MOU. When Supplier has received a notice concerning revision of this guideline, Supplier immediately must complies with revised guideline and deliver procurement goods to SINFONIA, unless otherwise particular instructions. In case that Supplier, however, has justifiable reason or inevitable reason not to be able to comply with revised guideline, Supplier notifies SINFONIA its reason by a written notice in advance. When SINFONIA acknowledge its reason, SINFONIA can give Supplier specification change or other particular instructions according to discussion with Supplier.

Article 4 (Building framework for green procurement implementation and audit)

Supplier must build and maintain Supplier's corporate framework (hereinafter called Green procurement implementation framework) so that Supplier can comply with this Guideline, in accordance with Article 28 of Original agreement. During effective period of this MOU, in case that there is a major change in Green procurement implementation framework, Supplier must immediately notify SINFONIA its change by a written notice. SINFONIA, in case of request from Supplier or necessity acknowledged by SINFONIA, can enter Supplier's premises and implement an audit for Green procurement implementation framework. However, when SINFONIA acknowledges necessity of that action, SINFONIA makes an audit by obtaining prior approval from Supplier. In this case,

Article 5 (Guarantee)

Guarantee described in Section 1, Article 29 in the Original agreement, satisfies contents of this guideline, and also includes a matter of not in breach, Supplier guarantees it. With regard to the period of guarantee, mutatis mutandis, Section 2 and 3, Article 29 in the Original agreement shall be applied.

Article 6 (Response to nonconformity)

SINFONIA can, when Supplier committed a breach of this guideline, or conformity to this guideline came out, at any time, order its correction to Supplier. Supplier must comply with it. However, it does not mean the waiver of certain rights owned by SINFONIA, based upon Original agreement and individual contracts.

Article 7 (Indemnification)

When damages occur on SINFONIA due to a breach of matters in this MOU by Supplier, Supplier must compensates the damages.

Article 8 (Term and Termination)

The term of this MOU is whichever comes first timing from agreed point till cancel of Original agreement or till a time of notice from SINFONIA to Supplier for cancel release of this guideline. However, procurement goods related to existing individual contract still apply this MOU as far as no particular SINFONIA instructions.

Article 9 (Discussion)

Matters not set up in this guideline, matters in question of this guideline are to be solved by Original agreement and individual contract. In case, however, Original agreement and individual contract do not solve issues, SINFONIA and Supplier discuss and solve.

In witness of agreement in this MOU, two(2) sets are provided and each party has one set after putting signature and stamp.

Date: mm dd, yyyy

(SINFONIA) By : _____ (signature)

Name and Title : _____

Date : _____

(Supplier) By : _____ (signature)

Name and Title : _____

Date : _____

Chemical substances included in Products

ATTN Procurement Department ,SINFONIA TECHNOLOGY CO., LTD.

[Inquiry information(Written by SINFONIA TECHNOLOGY)]
Part No. or Control No.]
Name of part or indirect materia]
[Supplier information(Written by SINFONIA TECHNOLOGY)]
*Mfg. source of material * Mfg. Source of products
*Buyer-->Mfg.& Product Source, (Spec. unclear)
Name: " "
Model No.: " "
Name of company: " "

[Procurement source information]
First source " "
Secondary source " "
3rd source " "
4th source " "
5th source " "
*Please write company name of source, agent who received this inquiry

[Supplier information(Written by supplier)]
Fill-in date: " . , 20XX "
Company name: " "
Dept. name: " "
Job title: " "
Name: " "
Address: " "
Tel. No.:
FAX No.:
E-mail:
*Please write responsible person to answer in company of supplier.

(1) Weight of products, parts(g)
(2) Describe all sub materials (solvent, oil etc.) used and potentially stuck on production process in order of name, grade, model No., Mfg. company and with or without ingredient table. And attach ingredient table or material certificate for described material.(SDS is not acceptable.)

(Name, Grade name)	[Model name]	(Company name of Mfg.	[With or without content table]
( )	「 」	( )	「 」
( )	「 」	( )	「 」
( )	「 」	( )	「 」
( )	「 」	( )	「 」

"Notice to fill-in"
Note1. Describe content in numeric ppm even no intentional inclusion. If impossible to show numeric number, write as "unclear".
Note2. Write unit in ppm and mass(g) used for ppm.

NO.	Name of chemical substance	Filled in Supplier							Filled by SINFONIA TECHNOLOGY		
		Rank Prohibit/ management	Investigation Objective Yes(+), No(-)	Intentional inclusion Yes(+), No(-)	Alternative Yes(+), No(-)	Content Note 1,2 ppm/mass	Obsolete schedule		Threshold Level ppm	Measured value ppm	Judgment OK / NG

In-process chemical substances

ATTN Procurement Department ,SINFONIA TECHNOLOGY CO., LTD.

[Inquiry information(Written by SINFONIA TECHNOLOGY)]
Part No. or Control No.]
Name of part or indirect materia]
[Supplier information(Written by SINFONIA TECHNOLOGY)]
*Plastic molding *Press *Cold forging
*Other(Cutting, Griding)
Company Name: “ “
Tel. No.:
FAX No.:

[Procurement source information]
First source “ “
Secondary source “ “
3rd source “ “
4th source “ “
5th source “ “
*Please write company name of source, agent who received this inquiry

[Supplier information(Written by supplier)]
Fill-in date: “ . , 20XX “
Company name: “ “
Dept. name: “ “
Job title: “ “
Name: “ “
Address: “ “
Tel. No.:
FAX No.:
E-mail:
*Please write responsible person to answer in company of supplier. Do not write sales representative.

(1) Describe all indirect materials such as solvent, oil etc used (or inclusion) in order of (name, grade), “model No.”,(Mfg. Company). And attach ingredient table and material certificate. (SDS is acceptable.)
(2) In what process these materials are used? Residual Existing or no or unclear on processed goods? Write answers on right side of (1).

(Name, Grade name)	[Model name]	(Company name of Mfg.)	[Process to use]	(Residual on goods)	[Ingredient table]
( )	「 」	( )	「 」	(( )Exist, ( )No, ( )Unclear)	(( ) Yes, ( ) No)
( )	「 」	( )	「 」	(( )Exist, ( )No, ( )Unclear)	(( ) Yes, ( ) No)
( )	「 」	( )	「 」	(( )Exist, ( )No, ( )Unclear)	(( ) Yes, ( ) No)
( )	「 」	( )	「 」	(( )Exist, ( )No, ( )Unclear)	(( ) Yes, ( ) No)

NO.	Name of chemical substance	Ingredient table, Residual on goods and Analysis result (Filled in SINFONIA TECHNOLOGY)								
		Rank Prohibit/ management	Investigation Objective Yes(+), No(-)	Intentional inclusion Yes(+), No(-)	Alternative Yes(+), No(-)	Content ppm/mass	Obsolete schedule	Threshold Level ppm	Measured value ppm	Judgment OK / NG

ATTN Procurement Department ,SINFONIA TECHNOLOGY CO., LTD.

Date:

Certificate of non inclusive particular chemical substances

Reference. No.	
Company name:	
Dept. name:	
Name and Title:	
Signature:	
Address:	
Tel. No.:	
FAX No.:	
E-mail:	

Regarding all parts, materials listed herein and being delivered to SINFONIA by us, we hereby certifies that following prohibition chemical substances are not intentionally inclusive and lower than threshold level. While, we also guarantee that the parts and materials which are designated as an exempted application in Annex to RoHS Directive shall be applicable to this certificate.

1. Prohibition chemical substances in products

NO.	Name of chemical substance	Threshold level
1	Tributyl Tin Oxide (TBTO)	Intentional use/addition is prohibited
2	Tributyl tin (TBT) and Triphenyl tin (TPT) compounds	Less than 1,000 ppm at the weight ration of tin.
3	Polychlorinated biphenyls(PCBs)	Intentional use/addition is prohibited
4	Polychlorinated Naphthalenes (more than 2 chlorine atoms)	Intentional use/addition is prohibited
5	Perfiuoro (octane -1 – sulfonic acid) (PFOS) and its salts and Perfluorooctanesulfonyl fluoride (PFOSF)	Intentional use/addition is prohibited
6	Perfluorooctanoic acid (PFOA) and its salts and PFOA-related substances	Intentional use/addition is prohibited
7	Phenol,2-(2H-1,2,3-benzotriazol-2-yl)-4,6-bis (1,1-dimethylethyl)	Intentional use/addition is prohibited
8	Hexabromocyclododecane (HBCD or HBCDD) and Specified chemical substances under CSCL Class 1	Intentional use/addition is prohibited
9	Asbestos (and other product prohibition substances under Article 55 of Industrial Safety and Health Act, and also specified substances by Law on the Prohibition of Chemical Weapons and the Regulation of Specific Chemicals	Intentional use/addition is prohibited
10	Short-chain chlorinated paraffins (with a carbon chain length of between 10 and 13)	Intentional use/addition is prohibited
11	Polychlorinated terphenyls （PCTs）	Intentional use/addition is prohibited
12	Azocolourants and azodyes which form a specific certain aromatic amines	Less than 30 ppm as specific amines
13	Ozone Depleting substances (CFCs, HBFCs, HCFCs, Carbon tetrachloride, etc.)	Intentional use/addition is prohibited
14	Fluorinated greenhouse gases (PFC,SF6)	Intentional use/addition is prohibited
15	Radioactive substances (Group)	Intentional use/addition is prohibited
16	Phenol, Isopropylated Phosphate (3:1) (PIP (3:1))	Intentional use/addition is prohibited
17	Decabromodiphenyl ether （DecaBDE）	Intentional use/addition is prohibited
18	Hexachlorobutadiene （HCBD）	Intentional use/addition is prohibited
19	2,4,6-Tris （tert-butyl） phenol （2,4,6-TTBP）	Intentional use/addition is prohibited
20	Pentachlorothiophenol （PCTP）	Intentional use/addition is prohibited
21	Dechlorane Plus	Intentional use/addition is prohibited
22	Perfluorohexanesulfonic acid (PFHxS) and its salts and PFHxS-related substances	Intentional use/addition is prohibited
23	Long-chain perfluorocarboxylic acids (LC-PFCAs) and its salts and LC-PFCAs-related substances	Intentional use/addition is prohibited
24	Medium-chain chlorinated paraffins (with a carbon chain length of between 14 and 17)	Intentional use/addition is prohibited
25	Cadmium and its compounds	100 ppm and 5 ppm for batteries only
26	Hexavalent chromium and its compounds	1,000 ppm
27	Lead and its compounds	1,000 ppm, 300 ppm for polyvinyl chloride cables, and 40ppm for batteries only

28	Mercury and its compounds	1,000 ppm, 1 ppm for batteries only
25 ～ 28	Heavy metals contained in packaging materials (Gross amount of lead, cadmium, Mercury and hexavalent chromium)	100 ppm(Intentional use/addition is prohibited)
29	Polybrominated biphenyls (PBBs)	1,000 ppm
30	Polybrominated diphenyl ethers (PBDEs)	1,000 ppm
31	Phthalic acid esters (DEHP,BBP,DBP,DIBP)	1,000 ppm

2. Parts, materials to certify
(Series name is acceptable, in this case, all family parts and materials in the same series shall be guranteed.)
Note 1: In case of the parts correspond to an exceptional item, define the exemption code.

SINFONIA TECHNOLOGY Item Code	Delivered Part No	Name of Supplier	Nomenclature	Exemption Code Note1

[Continued pages follow ( )Yes, ( )No, Check box]

The fields below are SINFONIA TECHNOLOGY use.

Requesting Dept.:
Person in Charge;
Tel. No.:
Fax No.:
E-mail :

ATTN Procurement Department ,SINFONIA TECHNOLOGY CO., LTD.

Date:

Proposal for Alternative, New parts and Process change

We hereby propose SINFONIA TECHNOLOGY CO.,LTD. Concerning the part(s) and/or the material(s) to be delivered as follows:

This sheet is used for a change proposal for making concentration (threshold) of impurities contamination lower than the regulated value without intentional addition of the prohibited chemical substances.

Company name:
Dept. name:
Name and Title:
Signature
Address:
Tel. No.:
FAX No.:
E-mail:
Delivery category : material , part , sub-assembly , product

Concrete proposal {Describe SINFONIA TECHNOLOGY part No. (If it' available): Format is free, use separate sheet as necessarily.)

SINFONIA TECHNOLOGY P/N	SINFONIA TECHNOLOGY name	Supplier P/N	Supplier name

Current

Proposal

Expected time to apply: , th, 20XX

Attached document (attached, no)

Influence to performance [( )Affected, ( )No] (Put check mark in the corresponding bracket)

( )Life ( )Weight ( )Anti-corrosion ( )Strength ( )Reliability ( )Appearance
( )Surface roughness ( )Others ( )

( ) Alternatives
- ( ) Change of material, part
- ( ) Change of Indirect material(solder, adhesive)
- ( ) Change of plating process
- ( ) Material change of print, paint
- ( ) Other

( ) New parts
- ( ) New proposal of material, part
- ( ) New proposal of Indirect material(solder, adhesive)
- ( ) Other

( ) Process change
- ( ) Change of vendor, supplier
- ( ) Change of production facility, country
- ( ) Change of Manufacturing method)
- ( ) Other

Decision

( ) Approved
( ) Conditionally approved (Refer to comments below in special term)
( ) Rejection by reason shown below
Planned to realize approx 20XX

Quality Assurance Approval	Engineering Approval	Procurement Department

Note/comment

8. Revision history

Edition	Date	Description
1	September 19, 2001	
2	November 26,2004	Wholly revised to meet the RoHS Directive.
3	December 29,2005	To align with the Joint Industry Guide (JIG), the following revision was made: 1. "Introduction" (p. 1) and "Major points for revision" were revised accordingly. 2. "Contents" (p. 2) was revised to include "Revision History." 3. Basic Environment Policy of SINFONIA TECHNOLOGY CO., LTD. (p. 3) was revised. 4. Table 1 Prohibited substances (p. 6) was revised to align it with JIG requirements for such substances. 5. The answers shown in pages 7 and 9 and documents to be submitted were revised to include JGPSSI Survey Sheets. 6. "Procurement of indirect materials and likewise related to production activity" (p. 8) was revised to include description about submission of "Information sheets for designated substances contained." 7. The number of substance groups for which "[5] Submittal of Non-inclusive Guarantee Certificate for particular chemical substances contained in the raw materials and/or parts" (p. 10) is applicable was revised from 6 to 15. 8. Separate Table 1 "List of prohibited substances and those subject to surveillance" was deleted. 9. Separate sheets 3, 4 and 5 were wholly revised, and Separate sheet 7 "An example of form of "Information sheets for designated substances contained" was added.
4	September 20,2006	To align with the RoHS Directive, the following revision was made: 1. A statement to the effect that the exemptional substances defined by the relevant annexes of the RoHS Directive shall be excluded was included in the following sections: P1. Introduction P4. Section 3 "Scope of Applicability" P5. Section 4.2.1 Procurement of parts and materials for products P6. In Table 1, a statement to the effect that for substances subject to surveillance, the denominator shall be the total weight of the parts/products was added as Note 3. P10. Section 5.2 Documents to be submitted for Green procurement survey [5] Separate sheet 5: The threshold level for hexavalent chromium was revised to align with JGPSSI (1,000ppm was added)
5	April 1,2009	1. The company's name was changed from SHINKO ELECTRIC CO., LTD. to SINFONIA TECHNOLOGY CO., LTD. 2. The material department was renamed to the procurement department.
6	March 1,2010	To align with REACH and other regulations, the following revision was made: 1. The number of prohibited substance groups was revised to 19, and a new category of "managed substance" was added. 2. The category of "substances subject to surveillance" was deleted. 3. The answers and documents to be submitted were revised to include JAMP MSDSplus/AIS. 4. Separate sheets 3, 4 and 5 were revised, and Separate sheet 7 "An example of form of "Information sheets for designated substances contained" was deleted.
7	February 1,2011	1. Basic Environment Policy of SINFONIA TECHNOLOGY CO., LTD. was revised. 2. To align with JIG, Table 1-1 Prohibited substances, Table 1-2 Managed substances and Separate sheet 5 were revised.

8. Revision history

Edition	Date	Description
8	March 1,2017	1. Wholly revised to align it with the increase in the number of RoHS II restricted substances (from 6 to 10). Four kinds of phthalate esters (DEHP, BBP, DBP and DIBP) were added as prohibited substances. Our company shall start the prohibition about one year before the enforcement of RoHS II Directive (i.e. July 1, 2018). * The RoHS II Directive for 10 kinds of substances comes into effect on July 22, 2019. - Our company requires that imported items also comply with the domestic laws and regulations (especially for items containing asbestos). - The non-inclusive certificate of chemical substance was revised into two types: general certificate applicable for all customers; and RoHS II special certificate.
9	April 1,2018	1. Review of prohibited substances - An ozone layer depleting substance HCFC (Hydrochlorofluorocarbon) was restored as a prohibited substance (exempt for use as a refrigerant for commercial refrigeration or airconditioning systems or for use for washing purposes comprising closed washing systems). - An alternative Freon, HFC (Hydrofluorocarbon) was deleted from the list of prohibited substances. - For tri-substituted organostannic compounds, more specific presentations were used for identifying tributyl tin (TBT) and triphenyl tin (TPT) compounds; and their threshold levels were set to less than 1000ppm (weight % of tin). - The threshold level of “azocolourants and azodyes which form a specific aromatic amines” was set to less than 30ppm (content of specific aromatic amines). - The number of chlorine atoms of polychlorinated naphthalenes was revised from 3 to 2 (according to the revision of the regulation of the Chemical Substances Control Law on March 2, 2016). - Specific alternatives for polychlorinated biphenyl (PCB) were deleted since they are not contained in the list of Class 1 Specified Chemicals of the Chemical Substances Control Law or described in the POPs convention. - The Japanese name of PFOS was revised according to that adopted by the Chemical Substances Control Law, and its salts were defined as prohibited substances. 2. Four kinds of prohibited substances of phthalate esters(DEHP, BBP, DBP and DIBP) Change of the application date - Application start date was changed to July 22, 2018 according to the result of customer questionnaire surveys for practical timetables of application for the 10 substances. 3. Unification of the non-inclusive certificates of chemical substance - Non-inclusive Guarantee Certificate for chemical substances under RoHS II or other regulations (Separate sheet 5b) was disused while the non-inclusive certificate of chemical substance (Separate sheet 5) was made available also for these substances. 4. The non-inclusive certificate was revised to include a document control no. entry field (Separate sheet 5). - To comply with the requirements for CE marking for RoHS Certificate of Compliance, a new entry field for defining supplier’s control number was defined.
10	December 1,2018	1. Correction of the name of statute - An alias “RoHS II Directive” was disused while its official name “RoHS Directive” was adopted. 2. Correction of Scope of Application - Taking into consideration such situation that the customer-specified threshold requirements or other delivery conditions exceed those described in the guidelines, a statement to the effect that the product specifications regarding this matter shall be finalized subject to discussions between the customer and our company was added. 3. Deletion of description about survey formats (JAMP AIS / MSDSplus) - The description was deleted since JAMP AIS / MSDSplus has been replaced with chemSHERPA-AI/CI since the end of June 2018.

8. Revision history

Edition	Date	Description
11	July 1,2019	1. Review of prohibited substances - Perfluorooctanoic acid (PFOA) and its salts and PFOA-related substances have been designated as Level 1 prohibited substances (since January 4, 2020). As a result, Level 1 prohibited substances groups have numbered 15. - Perfluorooctanesulfonyl fluoride (PFOSF), a Lebel 1 prohibited substance, was added in the PFOS field (PFOSF was formerly categorized in a Class 1 Specified Chemicals per the Chemical Substances Control Law).
12	August 1,2022	1. Review of Basic Environment Policy 2. Review of prohibited substances - PBT5 substances per US TSCA were designated as Level 1 prohibited substances. 3. EU's Medical Device Regulation (MDR) was added in the list of applicable laws and regulations for managed substances (managed in the like manner as chemSHERPA managed substances). 4. Review of Non-inclusive Certificate for particular chemical substances (Separate sheet 5; a new form with an entry field of exempt code per the RoHS Directive).
13	August 1,2025	1. Review of prohibited substances Dechlorane plus, C9-C14 perfluorocarboxylic acids (PFCAs) and its salts and PFCA-related substances, and perfluorohexanesulfonic acid (PFHxS) and its salts and PFHxS-related substances were added as Level 1 prohibited substances. 2. CN Administrative Measures for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products was added in the list of applicable laws and regulations for managed substances (managed in the like manner as chemSHERPA managed substances).
14	August 1,2026	1. Review of prohibited substances Long-chain perfluorocarboxylic acids (LC-PFCAs) and its salts and LC-PFCA-related substances,as well as medium-chain chlorinated paraffins (MCCPs) (with carbon numbers ranging from 14 to 17), have been added as Level 1 prohibited substances. *Since C9–C14 perfluorocarboxylic acids (PFCAs), its salts, and PFCA-related substances are included in LC-PFCA, they have been consolidated. 2. The scope of managed substances, chemSHERPA managed substances Explanatory Document, and the URLs for chemSHERPA managed substances Reference List have been updated.