

Green Procurement Guideline
SINFONIA TECHNOLOGY CO., LTD.
(Issue 10)



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Preface

The environmental preservation of global scale is a common wish of all over the world. The role of enterprise 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 day but in the future, contribute to create a society that comfortable to live in” as the environmental philosophy, SINFONIA TECHNOLOGY CO.,LTD. (hereinafter “SINFONIA”) is carrying out activity in product development, production activity and every area by considering. From this point of view, SINFONIA is promoting procurement of low environmental load parts and materials for production, and making effort to reduce environmental load coming out from corporate activity such as production etc. (Green procurement)

In order to obtain substantial result from this activity, cooperation of every supplier is absolute necessity, by procuring small environmental load parts and materials. SINFONIA is considering to advance a good relation of partnership by reducing environmental load and risk avoidance.

Centered in Europe, the law, regulation regarding particular chemical substance included in products have been reinforced, customer request to supply “the products not including harmful material”, it has become absolute necessity to exclude “particular chemical substance” included in every part composing product of SINFONIA applies this guideline for all procurement items.

Standing on this situation, SINFONIA applies this guideline for all procurement items.

By this revision of the guideline, for action to comply with regulation to investigation and laws relating to environment, as cooperation of every supplier becomes absolute necessity, SINFONIA sincerely requests your understanding and cooperation.

As this activity can build a firm partnership between supplier and SINFONIA believes that both parties can take a part of corporate social responsibility.

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Basic Environment Policy of SINFONIA TECHNOLOGY CO.,LTD.

<Philosophy for environment>

SINFONIA recognizes the effort for the global environmental preservation as an important management issue and has a philosophy of “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 day but in the future, contribute to create a society that comfortable to live in”.

<Action guidelines for environment>

1. Evaluating influence to environment caused by corporate activities, products and services, SINFONIA carries out environmental preservation activity for important items as far as technically and economically possible.
2. In order to improve environmental management system continuously, SINFONIA reviews its system as necessarily and also intends to implement prevention and protection of potential environmental contamination to be caused, in parallel with corporate activity.
3. SINFONIA abides by laws and regulations relating to the environment and agreement with industry groups, etc. associated with our company about environment-conscious.
4. SINFONIA implements following actions as important subjects.
 - (1) Environment-oriented development of technologies and shop-floor production (monozukuri)
 - (2) Environmental conservation activities aimed at low-carbon society, recycling-oriented society, and conservation of biodiversity
 - (3) Control for chemical substances and promotion of green procurement
 - (4) Preventive action against occurrence of pollution
 - (5) Community involvement through environment conservation activities
5. SINFONIA makes efforts in development of technologies to reduce environmental load in production stage, transporting stage, installation stage and disposal stage.
6. SINFONIA conveys the basic environmental policy and makes employees and all people working for SINFONIA acknowledge by providing education and training program, also publicizes it.

Green Procurement Guideline of SINFONIA TECHNOLOGY CO., LTD.**1. Purpose**

This “Green procurement guideline” shows the standard when SINFONIA procures raw materials, parts and products from suppliers. SINFONIA complies with environmental related laws and regulations of each country. To preserve human and the global eco-system, SINFONIA aggressively takes action to reduce environmental load of products and aims to establish a recycling economical society in cooperation with suppliers.

2. Corporate activity

- (1) Chemical substances managed by SINFONIA are recognized 3 categories of “prohibited substances (Level 1)”, “conditional prohibited chemical substances (Level 2)” and “managed substances” according to the guideline of JAMP (Joint Article Management Promotion consortium), and kept track of incoming hardware containing chemical substances data. SINFONIA carries out correspondence to 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) To meet the requirement of communicated information from supply chains with RoHS Directive, REACH Regulation, Industrial Safety and Health Act, CSCL and etc., SINFONIA smoothly improves communication and disclosure of information about chemical substances included in products with the cooperation of suppliers.
- (3) SINFONIA takes precedence in procurement from the supplier who is positively making efforts for environmental preservation on the premise of complying with environmental related laws and regulations.
- (4) SINFONIA tackles this issue by classifying procurement hardware into three groups.
 - ① Activity for procurement hardware of materials etc related to products procurement hardware of materials etc related to products mean all procurement hardware (products, parts and materials) which consist of merchandises to be sold by SINFONIA.
SINFONIA determines evaluation items of procurement hardware related to reduction of environmental load, and selects procurement hardware having smaller environmental load.
 - ② Activity for procurement hardware to be used for manufacturing action means facilities, tools, jigs and indirect materials (paint, plating solution, detergent, packing material), SINFONIA selects, a case-by-case basis, hardware of small environmental load.
 - ③ Activity for office use goods such as stationery etc.
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 step up environmental consciousness of employee.

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. However, despite prohibited chemical substances, if those substances cause an extreme difficulty to retain safety or reliability of products, or are exempted substances by RoHS Directive, those are excluded from application of this guideline. Incidentally, if specifications of procurement hardware are different from this guideline according to products requirement, corporate purchase specification substitutes the guideline. 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. Evaluation and Selection Standard

SINFONIA evaluates suppliers for Green procurement from two(2) sides of evaluation to supplier and evaluation results of procurement hardware. And regarding these two sides, SINFONIA selects, by higher priority, a supplier who is positively making effort to tackle the guideline requirement.

4.1 Evaluation and selection standard for supplier

(1) Effort to Environmental preservation activity

① Environmental management system (ISO14001) certified or self-declaration for the system.

② Following efforts regarding environmental preservation on-going.

- a. Existing clearly documented corporate philosophy, policy and goal about environmental preservation.
- b. Existing clearly documented organization, framework to promote environmental preservation activity
- c. Complying with environmental related laws and regulations.
- d. Providing education, enlightenment program regarding environmental preservation to all employees.
- e. Carrying out rationalization on manufacturing and logistics, having environmental consciousness.
- f. Making the effort of the limited use of packing and packaging materials.

(2) Establishment of the management system to ensure no chemical substances included in products.

- ① Building up system not to manufacture, sell products including harmful chemical substance through all process from manufacturing to shipment, and making effort to maintain and improve.
- ② Obtaining chemical substance inclusive content information of materials to be used at necessary timing, and information management system established.
- ③ Assigning a responsible person to control framework for chemical substances. The responsible person carries out education and enlightenment for harmful chemical substance to all employees and related person handling them.

(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 standard for procurement hardware

4.2.1 Procurement hardware of parts and materials related to products

(1) Categories of chemical substances

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

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

① Prohibited substances

Intentional addition of prohibited substances is not allowed in procurement hardware. Level 1 category shall be prohibited immediately. With respect to Phthalic acid ester in Level 2 (4 prohibited substances were added by RoHS Directive), this substance shall be prohibited on July 22, 2018 onward under a basic corporate policy. (6 prohibited substances including Lead defined in RoHS Directive have already been prohibited on April 1, 2005 onward.)

② Managed substances

The substances that need to be handled appropriately and correctly, and also they need to be monitored their consumption in consideration of the risk to human health safety and hygiene. And there may be some case that their application, incorporation and thickness are required to be reported by SINFONIA.

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

Category	Chemical substance	Threshold level ^{Note1}	Prohibited
Prohibited Substance Level 1 (14 substance 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}	
	Perfluoro (octane -1 – sulfonic acid) (PFOS) or its salt	No intentional use (addition) is allowed ^{Note2}	
	Phenol,2-(2H-1,2,3-benzotriazol-2-yl)-4,6-bis(1,1-dimethylethyl)	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}	
	Shortchain 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)	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}	

Note1 Threshold level is amount of impure substance mixed in production lines or other situation.

Depending upon customer requirement to SINFONIA, there may be a case separately to provide severer threshold level than this table.

Note2 “Intentional use/addition” means; applying the designated substances continuously for forming a product in order to implement a 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 shall be excluded from using this 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 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		Effective as of July 22, 2018 onward
	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 amount of impure substance mixed in production lines or other situation.

Depending upon customer requirement to SINFONIA, there may be a case separately to provide severer threshold level than this table.

Note 2: "Intentional use/addition" means; applying the designated substances continuously for forming a product in order to implement a 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 applicable managed substances is not restricted, but their use and contained concentration must be monitored. With respect to the applicable 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 these guidelines are equivalent to the substances listed in the legal 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 these guidelines.

Legal regulations, industry standards etc. applicable to the managed substances	
Applicable regulations	Remarks
Japan Chemical Substances Control Law (Class 1 specific chemical substances)	
USA Toxic Substances Control Act: TSCA Use prohibition or use limited of substances (Article 6)	Excluding the prohibited substances prescribed in this Guideline.
EU ELV Directive 2011/37/EU	Excluding the prohibited substances prescribed in this Guideline.
EU RoHS Directive 2011/65/EU	Excluding the prohibited substances prescribed in this Guideline.
EU POPs Regulation (EC) No. 850/2004 ANNEX I	Excluding the prohibited substances prescribed in this Guideline.
EU REACH Regulation (EC) No. 1907/2006 Candidate List of SVHC for Authorization and ANNEX XIV (substances subject to authorization)	Excluding the prohibited substances prescribed in this Guideline.
EU REACH Regulation (EC) No. 1907/2006 ANNEX XVII (substances subject to restraint)	Excluding the prohibited substances prescribed in this Guideline.
Global Automotive Declarable Substances List (GADSL)	Excluding the prohibited substances prescribed in this Guideline.
IEC 62474 DB Declarable substances group and declarable substances	Excluding the prohibited substances prescribed in this Guideline.

Refer to the following document and list for sample substances considered “managed substances” as specified in these guidelines, in accordance with legal regulations and industry standards.

“chemSHERPA Declarable Substances Ver. (latest version) description” <https://chemsherpa.net/chemSHERPA/tool/>

“chemSHERPA Declarable Substances Ver. (latest version)” <https://chemsherpa.net/chemSHERPA/tool/>

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

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

Surveyed 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/CI^{Note2}, it is mandatory required to attach a supplemental information on both component and law observance.

Note1, Surveyed chemical substances are “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 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) Proposal for Alternative/New parts and Process change

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 in case of new parts delivery or process change is required caused by such changes.

(5) Supplier selection policy of SINFONIA considering the environment load reduction.

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:

- ① Utilizing recycling resources positively
- ② Measure taken toward downsizing, weight saving and/or long life of parts and products.
- ③ Measure taken toward resource saving, energy saving
- ④ Recycling design applied and easy to disassemble, separate and collect.
- ⑤ Objective to the environmental labeling (Types I, II and III)., Publicizing environmental information related to merchandise
- ⑥ Disclosing 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) Cooperation request for 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" which is actually a safety data sheet.

4.2.3 Procurement of office use goods such as stationary etc

(1) Green purchase

Procurement of office use goods has a priority for those of which same effort as item 4.2.1(5) is taken.

5. Outline of handling for Green procurement survey

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, supplier 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 for efforts related to 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.

③Chemical 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 principal, 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.

④In-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.	<input type="checkbox"/> Yes <input type="checkbox"/> No Approx. .20XX
② Have you already built system to obtain inclusive information of chemical substance at necessary timing and control its information?	<input type="checkbox"/> Yes <input type="checkbox"/> No
③ Has each responsible person in control framework for included chemical substance been decided?	<input type="checkbox"/> Yes <input type="checkbox"/> No
④ Is your company providing education and enlightenment program related to included chemical substance to employees and persons in charge?	<input type="checkbox"/> Yes <input type="checkbox"/> No
⑤ Regarding system to ensure control for chemical substance included, has your company documented it? *If already documented, please submit that separately.	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
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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 compensate 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 : _____

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	Perfluoro (octane -1 – sulfuric acid) (PFOS) or its salt	Intentional use/addition is prohibited
6	Phenol,2-(2H-1,2,3-benzotriazol-2-yl)-4,6-bis (1,1-dimethylethyl)	Intentional use/addition is prohibited
7	Hexabromocyclododecane (HBCD or HBCDD) and Specified chemical substances under CSCL Class 1	Intentional use/addition is prohibited
8	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
9	Shortchain chlorinated paraffins (with a carbon chain length of between 10 and 13)	Intentional use/addition is prohibited
10	Polychlorinated terphenyls (PCTs)	Intentional use/addition is prohibited
11	Azocolourants and azodyes which form a specific certain aromatic amines	Less than 30 ppm as specific amines
12	Ozone Depleting substances (CFCs, HBFCs, HCFCs, Carbon tetrachloride)	Intentional use/addition is prohibited
13	Fluorinated greenhouse gases (PFC,SF6)	Intentional use/addition is prohibited
14	Radioactive substances (Group)	Intentional use/addition is prohibited
15	Cadmium and its compounds	100 ppm and 5 ppm for batteries only
16	Hexavalent chromium and its compounds	1,000 ppm
17	Lead and its compounds	1,000 ppm, 300 ppm for polyvinyl chloride cables, and 40ppm for batteries only
18	Mercury and its compounds	1,000 ppm, 1 ppm for batteries only
15~18	Heavy metals contained in packaging materials (Gross amount of lead, cadmium, Mercury and hexavalent chromium)	100 ppm(Intentional use/addition is prohibited)
19	Polybrominated biphenyls (PBBs)	1,000 ppm
20	Polybrominated diphenyl ethers (PBDEs)	1,000 ppm
21	Phthalic acid esters (DEHP,BBP,DBP,DIBP)	1,000 ppm (To be applied after 7/22/2018)

2. Parts, materials to certify

(Series name is acceptable, in this case, all family parts and materials in the same series shall be guaranteed.)

Note 1: After transition to "SAP System, the title of "SINFONIA TECHNOLOGY P/N" column will be changed to "SINFONIA TECHNOLOGY Item Code".

Note 2: Put check mark (✓) in N/A column for non-prohibited substances or in case of RoHS Directive is not applicable.

SINFONIA TECHNOLOGY P/N Note 1	Delivered Part No	Name of Supplier	Nomenclature	N/A Note 2

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

New parts

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

Process change

Change of vendor, supplier Change of Manufacturing method)
 Change of production facility, country Other

Decision	<input type="checkbox"/> Approved <input type="checkbox"/> Conditionally approved (Refer to comments below in special term) <input type="checkbox"/> Rejection by reason shown below <u>Planned to realize approx 20XX</u>	Quality Assurance Approval	Engineering Approval	Procurement Department
	Note/comment _____ _____ _____			