



TDK Green Procurement Standard

Ver.9

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Contents

Subject	Page
Introduction	3
1. About the TDK Green Procurement Standards Document	4
1-1 Purpose	4
1-2 Scope of Application	4
1-3 Definition of Terms	4
1-4 Guarantee	6
1-5 Confidentiality	7
1-6 Revisions	7
1-7 Inquiries	7
2. Environment-Related Substance Standards	8
2-1 Prohibition of Prohibited Substances	8
2-2 Declaration of Content-Controlled Substances	8
2-3 Survey of Chemical Substance Content	8
2-4 Amendment of Information on Chemical Substance Content in Purchased Items	10
2-5 Additions and Changes to Standards of External Organizations Quoted in Annex	10
2-6 Response to Further Survey Requests	10
2-7 Response to Revision of This Document	10
3. Related Documents and Materials	11
4. Record of Establishment and Revisions	12
5. Main Revisions of TDK Green Procurement Standard Ver. 8	12

Introduction

We have entered an age in which protection of the global environment is one of the most important issues for corporate activities in terms of achieving the sustainable development of humankind. Related efforts enhance corporate value, and their steady accumulation contributes to the international community. In order to fulfill our responsibility to the environment, at TDK we have stipulated an Environmental Policy and Environmental Vision and are endeavoring to solve environmental problems. In our relations with suppliers in particular, with the aim of giving priority to the procurement of production parts and materials that contribute to reducing the environmental load, we established the TDK Green Procurement Standard (First Edition) in April 1999 and request the cooperation of our suppliers in the creation of environment-conscious products.

In order to take account of changes in Japanese and international environment-related laws and regulations, as well as changes in social requirements and technological progress, we have conducted a revision of this document. We request our suppliers to appreciate TDK's environmental efforts and the contents of this document, and we look forward to their continued cooperation.

For more information on TDK's environmental responsibility, please visit the TDK website →
CSR Activities → Environmental Responsibility → Environmental Policy and Environmental Vision.

English: http://www.global.tdk.com/csr/environmental_responsibility/csr03100.htm

Japanese: http://www.tdk.co.jp/csr/environmental_responsibility/csr03100.htm

Chinese: http://www.tdk.co.jp/corp/zh/csr/environmental_responsibility/csr03100.htm

April 1, 2018
Procurement & Logistics Group
SCM & Management System HQ
TDK Corporation

1. About the TDK Green Procurement Standard

1-1 Purpose

The purpose of this document is to give priority to the procurement of purchased items from suppliers that contribute to reducing the environmental load and fulfill social responsibility by clarifying chemical substances that are prohibited (“prohibited substances”) and chemical substances for which controlled content is required (“controlled substances”), thereby further promoting green procurement activities by the TDK Group.

1-2 Scope of Application

This document applies to business partners from whom the TDK Group procures products or to whom it consigns manufacture, etc. (hereafter referred to collectively as “suppliers”) and purchased items sold and delivered by suppliers to the TDK Group. Please note, however, that if the TDK Group requires a specific standard relating to chemical substance content in addition to this document, the specific requirement shall take precedence.

1-3 Definition of Terms

The terms in this document shall be defined as follows:

(1) TDK Group

The “TDK Group” covers companies in Japan and overseas in which TDK Corporation, either directly or indirectly, possesses a majority of the voting rights of all shareholders.

(2) Purchased items

“Purchased items” are products sold and delivered by suppliers to the TDK Group that conform to one of the following four categories:

(a) Chemical

A “chemical” is a substance or Preparation as explained in TITLE I Chapter 2 Article 3(1) and (2), respectively, of the European Council’s No. 1907/2006 REACH regulation (Registration, Evaluation, Authorization and Restriction of Chemicals).

Ex. Metallic material, metallic oxide, resin pellet, paste, solder, binder, adhesive, paint, ink

(b) Part

A “part” is an article as explained in TITLE I Chapter 2 Article 3(3) of the European Council’s No. 1907/2006 REACH regulation. Ex. Electronic parts, machinery parts, insulation tape and film

(c) Packaging

Among (b) parts, “packaging” refers to items used for sending, protecting, and identifying TDK products.

Ex. Trays, bags, buffer materials, staplers, cardboard boxes, reels, tape, binding bonds, wraps, labels, manuals, index cards

Exceptions: Retrievable and reusable pallets, containers, and boxes that do not cause secondary contamination

(d) Other purchased items

Among items sold and delivered by suppliers to the TDK Group, “other purchased items” refer to items that do not fall into any of the above three categories and for which either the [TDK Group designates applicability of this document](#) or the supplier declares applicability of this document.

Ex. Jigs and tools, office items, metal molds, equipment, and other items designated by the TDK Group

(3) Chemical substances

“Chemical substances” refer to elements (single substances) and compounds (including alloys).

(4) Environment-related substances

“Environment-related substances” refer to the chemical substances designated by the TDK Group and listed in attached Environment-Related Substances (Appendix 1) that exert an impact, or have a possibility of exerting an impact, on the human body, environment, or socially.

(5) Prohibited substances

Among environment-related substances, “prohibited substances” refer to the chemical substances listed in the attached Environment-Related Substances (Appendix 1) “Prohibited Substances A-1,” “Prohibited Substances A-2,” “Prohibited Substances A (Supplement).”

(6) Content-controlled substances

Among environment-related substances, “content-controlled substances” refer to the chemical substances listed in the attached Environment-Related Substances (Appendix 1) “Content-Controlled Substances A.”

(7) Content

“Content” refers to the fact that chemical substances are included in purchased items as ingredients or constituents.

(8) Intentional addition

“Intentional addition” refers to the fact that a specified chemical substance is included in the purchased item for a reason.

(9) Impurities

Among substances contained in purchased items, “impurities” refer to substances that cannot be totally removed mechanically in the refining process or substances that occur in the synthetic reaction process and technically cannot be totally removed.

Note: Although dopant, which is used in the manufacture of semiconductor devices, etc., is sometimes added intentionally, the extremely small amount remaining in semiconductor devices is actually treated as an impurity.

(10) Non-applicability

“Non-applicability” refers to an exception being made to the application of prohibited substance and content-controlled substance regulations if the supplier uses the substance only for a specific end use, accurately enters the contained amount, and declares non-applicability.

(11) End use

“End use” refers to purpose of use in the purchased item using the chemical substance. The existence or not of prohibition, threshold levels, non-applicability, and so on are stipulated by end use in the annex.

Note: The end use in the purchased item using the chemical substance refers not to end use by the TDK Group but, for example, the addition of formaldehyde for making a purchased textile product. If the attached table entry were as follows, content would be prohibited.

Chemical substances	Requirement	Applications(use) of substance and scope of the Standards
Formaldehyde	Content prohibited	Textile product

(12) Threshold level

The “threshold level” stipulated in the annex is the permissible concentration of the chemical substance contained in each subpart of a purchased item.

Note: Some laws define the threshold level as the ratio of concentration per total product weight rather than per subpart. In this document, however, the definition is concentration ratio per subpart.

(13) Subpart

A “subpart” is a homogeneous material part that cannot be separated anymore.

(14) Homogeneous material

A “homogeneous material” is a material that cannot be mechanically separated into other materials. “Homogenous” means “of uniform composition throughout,” and “cannot be mechanically separated” means that it cannot be separated by unscrewing, cutting, shredding, grinding, polishing, etc.

Ex. Plastic, ceramic, glass, metal, plating film, paper, resin, ink, coating material, paint

1-4 Guarantee

(a) The supplier is required to “guarantee” that the purchased item conforms to this document and that information in submitted documents is accurate and complete. Please note that even if the purchased item or materials in the purchased item have been manufactured by a company other than the supplier, the supplier is required to take responsibility and submit accurate and complete information on the purchased item and purchased item materials.

(b) In the case that conformity with this document applies to only part of purchased item specifications, nonconformity with this document, including a violation of the guarantee described above, will be considered to be a defect of the purchased item.

1-5 Confidentiality

In principle submitted information will only be used within the TDK Group. If a public organization or customer of the TDK Group requests disclosure, we will disclose the information after taking appropriate measures so that the supplier cannot be identified, etc. We will abide by related laws, ordinances, and other norms in the handling of suppliers’ personal information.

1-6 Revisions

This document may be revised to take account of Japanese and international laws and regulations, changes in social requirements, etc.

1-7 Inquiries

Please make inquiries and submit materials requested in this document to the requesting section of the TDK Group or the following contact:

Material Management Section

Procurement Administration Department,

TDK Corporation

Tel.: 047-378-9454

Fax: 047-378-9176

2. Environment-Related Substance Standards

2-1 Prohibition of Prohibited Substances

In principle purchased items must not contain prohibited substances. However, this does not apply if a prohibited substance under the threshold level stipulated in Environment-Related Substances (Appendix 1) is contained as an impurity or if the supplier itself declares accurately in advance of delivery that the purchased item contains a prohibited substance.

2-2 Declaration of Content-Controlled Substances

If a purchased item contains a content-controlled substance, the supplier itself must declare accurately in advance of delivery that the purchased item contains a content-controlled substance. However, this does not apply if a content-controlled substance below the threshold level stipulated in the Environment-Related Substances (Appendix 1) is contained as an impurity.

2-3 Survey of Chemical Substance Content

If the TDK Group requests a supplier to conduct a survey relating to this document, if the supplier itself declares substance content in accordance with the provisions of 2-1 and 2-2, or if the supplier declares non-applicability, please accurately compile documents as shown in List of Materials to Be Submitted (Appendix 2) depending on the type of purchased item and promptly submit them.

2-4 Amendment of Information on Chemical Substance Content in Purchased Items

If information on chemical substances contained in purchased items (composition, amount contained, etc.) is amended, or if a change occurs, please update the Survey of Chemical Substance Content information immediately and notify the TDK Group of the correction in writing.

2-5 Additions and Changes to Standards of External Organizations Quoted in Annex

The prohibited substances and content-controlled substances stipulated in the attached Appendix are quotations of the lists of prohibited substances and content-controlled substances stipulated in the legal requirements of other countries (REACH, RoHS [Restriction of Hazardous Substances directive], etc.) or independently by external organizations, such as the Global Automotive Declarable Substance List (GADSL). Since it is essential to conform to these lists in order to meet legal requirements and customer and social requirements, the TDK Group requests suppliers to regularly check these lists and deliver purchased items that meet the requirements of the latest applicable list. If, as a result of a list amendment, it is determined that a purchased item does not meet the requirements of the amended list, please update the Survey of Chemical Substance Content information within 30 days from the day of list amendment and notify the TDK Group of the correction in writing. If there is no report, it will be assumed that the requirements of the amended list are guaranteed.

Please note that lists will be amended regardless of the wishes of the TDK Group and without any specific forewarning to suppliers.

2-6 Response to Further Survey Requests

If the TDK Group considers it necessary because of legal revisions, changes in customer requirements, revisions of this document, or other reasons, the TDK Group may request a further Survey of Chemical Substance Content for all or specific purchased items. In this case, we ask suppliers to submit the further survey promptly. However, the following complementary documents may be submitted in lieu of a further survey:

- (a) Non-use guarantee, non-use certificate, etc. relating to the amended part
- (b) Non-use guarantee, non-use certificate, etc. relating to the specific requirement

2-7 Response to Revision of This Document

If the TDK Group revises this document, suppliers are requested to check the content immediately. If, as a result of the revision, a purchased item no longer satisfies this document, please update the Survey of Chemical Substance Content information within 30 days from the said revision and notify the TDK Group of the correction in writing. If there is no notification, it will be assumed that the requirements of the amended list are guaranteed.

3. Related Documents and Materials

Appendix 1 Environment-Related Substance List

See Appendix 1 for specific substance lists and supplementary lists.

How to Read Appendix 1

Requirement	Threshold level	Meaning
Content prohibited	—	Prohibited to be intentionally added or to be contained as impurity
Content prohibited	< 1,000 ppm	Intentional addition prohibited; content as impurity must be less than 1,000 ppm.
Content controlled	—	If content is identified, the amount must be clarified and declared, regardless of whether it is intentional addition or impurity.
Content controlled	< 1,000 ppm	If content exceeds 1,000 ppm, the amount must be clarified and declared, regardless of whether it is intentional addition or impurity.
Non-applicability	—	In certain specific cases, if no special provisions are provided separately, the supplier may be exempted from application of the prohibited substance or content-controlled substance standards if the supplier accurately enters the contained amount and declares non-applicability.

Note: Even if specific legal requirements (RoHS directive, ELV director, etc.) stipulate “no more than” (\leq), in consideration of customer requirements, etc., this document stipulates “less than” ($<$).

Appendix 2 List of Materials to Be Submitted

Appendix 3 Analysis Methods

Form 1. Survey format of Conflict Minerals

4. Record of Establishment and Revisions

April 1, 1999	Established
February 1, 2000	Ver.1
February 1, 2004	Ver.2
July 1, 2006	Ver.3
August 1, 2007	Ver.4
September 1, 2008	Ver.5
June 1, 2009	Ver.6
August 1, 2009	Ver.6.1
February 1, 2010	Ver.6.2
January 1, 2011	Ver.7.0
September 1, 2011	Ver.7.1
July 1, 2012	Ver.7.2
April 1, 2014	Ver.8
April 1, 2018	Ver.9

5. Main Revisions from TDK Green Procurement Standards Document Ver. 8

- Revision by law amendment
 - Add 4 Phthalates of EU RoHS Directive as “Prohibited Substances”

Chemical substances	CAS No.	Requirement	Threshold level	Scope
Bis (2-ethylhexyl) Phthalate (DEHP)	117-81-7	Content prohibited	< 1,000ppm	All applications
Butyl Benzyl Phthalate (BBP)	85-68-7	Content prohibited	< 1,000ppm	All applications
Dibutyl Phthalate (DBP)	84-74-2	Content prohibited	< 1,000ppm	All applications
Diisobutyl Phthalate (DIBP)	84-69-5	Content prohibited	< 1,000ppm	All applications

- Response to Chemical Substances Control Law(CSCL),IEC62474, and GADSL
 - Chlorine number of Polychlorinated Naphthalene (PCNs) is changed from 3 to 2.
 - Delete the threshold level of HBCD.
- Revise the applicable laws and regulations and abolish the Environment-Related Substances List B.
 - Environment-related Substances were changed to substances list of chemSHERPA managed standards.
- Change of designated format for Survey of Chemical Substance Content
 - New Appendix 2 was created as List of Materials to Be Submitted.
 - Change the survey format of Chemical Substance to "chemSHERPA".
- Response to Responsible Minerals Initiative (RMI)
 - New create Form-1 "Conflict Minerals containing check sheet".
 - We identify exact survey target early and aim for conflict free.
- Changed the precision analysis substances
 - Change the analysis target of the chemicals and parts from 2 substances to 4 substances.
 - Requirements: Cadmium, lead, mercury, and hexavalent chromium
- Amendment of other words and phrases in general and clarification of expressions