

LECIP Group

Green Procurement Guidelines

7th Edition

February 17, 2025

LECIP

1 . Introduction

We would like to thank you for your cooperation in our procurement activities.

We at the LECIP Group are engaged in our daily business activities based on our management philosophy of "providing society with products and services that help realize a comfortable everyday life through energy conservation, global environmental responsiveness, and enhanced security.

In recent years, customers' awareness of products and companies has been changing, and it has become essential to address environmental issues such as CO₂ reduction and reducing the impact of chemical substances on people and the environment as part of the social responsibility expected of companies.

When considering the sustainable development of society as a whole, it is essential for us to cooperate not only with the activities of our group, but also with our suppliers, who share our issues and are willing to work with us to achieve our goals.

We will continue to strive for even greater environmental responsiveness based on good partnerships with our suppliers, and we would like to ask for your further support.

LECIP HOLDINGS CORPORATION

Managing Executive Officer (in charge of quality)

Toru Tanaka

LECIP CORPORATION

General Manager of Procurement Dept.

Tetsuya Takeyama

2. Environmental Policy of the LECIP Group

■ Basic Policy

As a member of society, we at the LECIP Group are committed to creating a recycling-oriented society suitable for the 21st century by creating attractive products and services that are compatible with the global environment, and by continuously striving to protect the environment while living in harmony with the community and society.

■ Course of Action

1. We will continuously work to protect the environment and prevent pollution by complying with environmental laws and regulations, setting specific environmental objectives and targets, and implementing and reviewing them.
2. All employees will share the company's philosophy of environmental activities, and will be informed and educated so that each of them will have a deep understanding of the relationship between their daily work and the environment, and link this to their actions.
3. We will cooperate and collaborate with the activities of local residents and suppliers involved in environmental protection, and actively disclose our company's environmental initiatives.

3. Requests to Suppliers

The LECIP Group promotes "Green Procurement" in order to provide customers with clean and safe products that are friendly to the global environment.

With regard to parts and materials that make up our products, sub-materials used in the manufacturing process, packaging, etc., it is necessary to consider resource saving, resource recycling, ease of disassembly and disposal, and energy-saving performance, as well as the use of materials that have minimal impact on the human body and the environment due to chemical substances.

Suppliers are requested to take the following actions regarding products, parts and sub-materials to be delivered to the LECIP Group.

- (1) Compliance with environmental laws and regulations
- (2) Ensure non-inclusion of prohibited substances
- (3) Disclosure of information on chemical substances contained in products
- (4) Compliance with customer requirements
- (5) Establishment of an environmental management system

(1) Compliance with environmental laws and regulations

We require our suppliers to comply with Japanese laws and regulations concerning chemical substances contained in products in their business activities.

(2) Ensure non-inclusion of prohibited substances

We require that products, parts, etc. delivered to the LECIP Group do not contain chemical substances prohibited by the following laws and regulations.

a) Substances listed in Annex II of the RoHS Directive (Directive 2011/65/EU)

<Reference URL>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02011L0065-20250101>

Reference information: Official Journal replacing Annex II of the RoHS Directive (Directive (EU) 2015/863)

<Reference URL>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015L0863>

b) Substances regulated by ELV Directive (Directive 2000/53/EC)

<Reference URL>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02000L0053-20230330>

c) Substances subject to restriction and authorization under the REACH Regulation (Regulation (EC) No 1907/2006)

Restricted substances: Substances listed in Annex XVII of the REACH Regulation.

Substances subject to authorization: Substances listed in Annex XIV of the REACH Regulation

<Reference URL>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02006R1907-20241010>

d) Substances listed in Annex I of the POPs Regulation (Regulation (EU) 2019/1021)

<Reference URL>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02019R1021-20241017>

e) Substances subject to prohibition or restriction of use regulated by Article 6 of TSCA (US Toxic Substances Control Act)

<Reference URL>

<https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/regulation-chemicals-under-section-6a-toxic-substances>

f) Chemical substances prohibited in GADSL (Global Automotive Declarable Substance List)

<Reference URL> <http://www.gadsl.org/>

g) Class I Specified chemical substances under the "Act on the Regulation of Manufacture and Evaluation of Chemical Substances".

h) Highly Toxic Substances under the "Poisonous and Deleterious Substances Control Act".

i) Substances prohibited from manufacture under the "Industrial Safety and Health Act".

Please note that the reference URLs provide information as of the date of publication of this guideline. Please check the latest information on applicable laws, regulations, and directives as appropriate.

(3) Disclosure of information on chemical substance contained

Many automobile manufacturers that are customers of the LECIP Group products require not only the non-inclusion of prohibited substances, but also reports on the content of controlled substances.

The LECIP Group manages information on chemical substances contained in its products using IMDS (International Material Data System), a materials database for the automotive industry.

As for the products and parts specified by us among the products and parts to be delivered to our group, please submit information on chemical substances contained in products based on IMDS input or the "JAPIA Standard Material Datasheet" (JAPIA sheet) maintained by the Japan Auto Parts Industries Association (JAPIA).

(4) Compliance with customer requirements

When we receive unique environmental requirements from our customers, we may ask them to take additional environmental measures, cooperate in surveys on chemical substances contained in our products, or submit a declaration of non-use of certain chemical substances.

If a response becomes necessary, the LECIP Group will make the request, and we ask for your cooperation.

(5) Establishment of an environmental management system

a) Report on acquisition of ISO 14001 and other external certifications

Although it is not mandatory to obtain ISO 14001 certification, we would like to

know the status of certification in order to strengthen partnerships with suppliers who are actively engaged in environmental conservation activities. Suppliers who have registered for other environmental certifications are also requested to report their certification status in the same way. (See Attachment 1)

b) Establishment of Environmentally Hazardous Substance Management System

In order to ensure thorough management of environmentally hazardous substances at suppliers (including manufacturers), we request the following actions.

1) Clarify the responsibility and authority for the management of chemical substances in products in internal rules, etc.

2) Clarify the management standards to be complied with regarding chemical substances contained in products, and disseminate them to the relevant departments.

3) Obtain information on chemical substances contained in purchased products and confirm that they conform to the management standards.

4) Document, maintain, and control the rules concerning the management of chemical substances in products. In addition, make and keep appropriate records of the results of the operation.

c) Environmental Audits

We have been requested by our customers of the LECIP Group's products to take actions to develop and ensure environmental assurance systems at suppliers, and we may conduct environmental audits of suppliers as necessary.

【Attachment 1: ISO 14001 External Certification】

Attachment 1: ISO 14001 External Certification Status Survey

End of document

ISO14001 External Certification Status Survey Form

Date of creation:

Company Name	
Location of your company	
Department/ Person in charge	
Person in charge Name	
E-mail address	
Phone Number	

ISO14001 certification status

Acquisition status /plan	Date of acquisition Planned date of acquisition	Registered Certification Body Certification number
Certified		
Scheduled to be certified		
No certification planned		
Other environmental Certifications already obtained		

Confirmation of receipt	Received

Revision History

Date of revision	Amendment	Amendment Clause	Details of Amendment
2007.4.23	First Edition		Newly enacted
2025.2.17	7th edition	Review of prohibited substances	<ul style="list-style-type: none">• Regarding substances prohibited under REACH regulations, SVHC (substances subject to authorization) have been changed to restricted substances and substances subject to authorization.• Regarding substances prohibited under TSCA, PBT substances have been changed to substances prohibited or restricted under Article 6 of TSCA
		Reference URL	Reflected the latest information.