

# **Nikon Green Procurement Standards**



**Effective April 1, 2018 (4.2 edition)**

**NIKON CORPORATION**

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## Preface

Nikon Group upholds the “Nikon Basic Procurement Policy” and performs material procurement with sincerity and fairness in order to continuously provide our customers with products that meet their expectations and to develop business that contributes to a more desirable society and global environment. With this as a base, the “Nikon CSR Procurement Standards” were formulated to give the supply chain societal accountability and the “Nikon Green Procurement Standards” were formulated for procurement of components and materials with consideration to the global environment.

In Nikon Group procurement activities, all of our procurement partners have been requested to observe the “Nikon Green Procurement Standards.” Priority is given to the purchase of items produced while taking environmental issues into consideration and to suppliers who are proactive in caring for and conserving the environment. This is required for our procurement partners to meet our requirements as we aim to contribute to a reduction of environmental burden within the entire supply chain.

In recent years, especially with the strengthening of national regulations related to hazardous chemical substances such as the RoHS directive and REACH regulations in Europe, management of hazardous chemical substances implemented in the overall supply chain has become an important issue. Not only Nikon Group but all procurement partners are required to build and apply the Management System of Chemical Substances in Product, and Nikon as well as our procurement partners perform thorough management of hazardous chemical substances in their products.

In this document, the standards that should be met by Nikon Group and all procurement partners in regards to Nikon Green Procurement Activities and the specific actions to be taken that require your cooperation are provided. After checking the contents, observe all of them.

Nikon Corporation  
Chairperson of the Environmental Committee

## Section 1: Nikon Green Procurement Standards

### 1. Objective

Nikon Group <sup>(Note 1)</sup> has established the standards specified in this document (The Standards) as part of its efforts to offer environmental conscious products in contributing to the establishment of a sustainable society. The Standards contain an explanation of the Nikon Group Philosophy and standards, requests to suppliers, and evaluations and measures. Nikon Group, in cooperation with suppliers proactively involved in environmental protection programs, promotes the implementation of green procurement programs based on The Standards.

(Note 1) Nikon Group: Nikon Corporation and the domestic and overseas group companies of Nikon Corporation. The group companies where The Standards are applied are shown in "Appendix 1."

### 2. Basic Philosophy Regarding Green Procurement

#### **Nikon Basic Green Procurement Policy**

- 1. To give priority to the purchase of items produced while taking environmental issues into consideration.**
- 2. To give priority to suppliers who are proactive in caring for and conserving the environment.**

#### 2.1 Selection of Procurement Items

Nikon Group, in accordance with the document "Separate Volume: Corresponding Chemical Substance Lists" <sup>(Note 2)</sup>, only procurement items that meet the following conditions are procured.

- (1) For procurement items (finished products, parts and materials, and packaging materials), all prohibited chemical substances in products are completely eliminated and all controlled chemical substances in products are properly controlled <sup>(Note 3)</sup>.
- (2) For manufacturing processes, all prohibited chemical substances in processes are completely eliminated and all controlled chemical substances in processes are properly controlled.

(Note 2) For the document "Separate Volume: Corresponding Chemical Substance Lists", always reference the latest edition.

(Note 3) Control: For environmental impact chemical substances, a system is maintained so that information such as the type and amount of the substance used, part of the product where the substance is used, and manufacturing process in which the substance is used can be immediately provided upon request of Nikon Group.

## 2.2 Supplier Selection

Nikon Group gives business priority to suppliers who meet the following conditions.

- (1) Those that make proactive efforts towards environmental conservation.
- (2) Those that appropriately reduce or completely remove chemical substances included in products.
- (3) Those that appropriately control chemical substances included in products.
- (4) Those who comply with the national regulations of each country related to their company and relevant international conventions.
- (5) Those that can be a subject to surveys regarding contained chemical substances.

### 3. Applicable Scope

(1) All organizations and business activities of suppliers delivering procured products specified in (2) below to Nikon (including their manufacturing processes and chemical substances used in the processes)

(2) Procured products

1) Finished products Products designed and manufactured by third parties contracted by Nikon, and sold with the Nikon brand. This also includes sales promotion goods with the Nikon brand that will be delivered to end users.

2) Parts and materials Parts and materials comprising Nikon products <sup>(Note 4)</sup>, including:

- Units, modules, assembly parts, etc.
- Electric parts (print substrates, devices, etc.)
- Mechanism elements (machinery formed parts, screws, etc.)
- Materials (Metal materials, resin materials, glass materials, etc.)
- Product accessories (instruction manuals, warranty certificates, cables, protective covers, etc.)
- Indirect materials (adhesives, lubricants, solders, paints, etc.)
- Repair parts.

3) Packaging Packaging materials used for Nikon products, finished goods, parts and materials, including packing materials used in transport.

- Presentation boxes, cardboard, buffer materials, protective bags, films, etc.
- Printing inks, labels, tapes, bands, etc.
- Palettes, wooden boxes, etc.

The scope must apply except for materials controlled by shipping companies or suppliers (returnable containers, invoices, etc.), or the case where the total amount of materials is limited and a recipient business unit consents to dispose of the materials in Nikon Group.

(Note 4) Nikon Products: All products manufactured by Nikon and those sold as Nikon brand products.

## 4. Green Procurement Requirements

Nikon Group requires the below conditions related to green procurement to be undertaken by our suppliers so that Nikon Group can give priority to the purchase of items produced while taking environmental issues into consideration and to suppliers who are proactive in caring for and conserving the environmental and in management of chemical substances in products based on “2. Basic Philosophy Regarding Green Procurement.”

### 4.1 Environmental Management System

#### 4.1.1 Establishment and Operation of the Management System of Environmental Conservation

A system for reducing the environmental burden caused by business activities is established and operated appropriately. The system must also covers the environmental impact chemical substances used in manufacturing processes.

#### 4.1.2 Establishment and Operation of the Management System for Chemical Substances in Products

A system for managing and reducing the environment impact chemical substances included in procured products is established and operated appropriately.

### 4.2 Environmental Impact Chemical Substances

#### 4.2.1 Regulatory Compliance for Procurement Items

Comply with the regulations regarding prohibited chemical substances and controlled chemical substances, as stipulated in the document “Separate Volume: Corresponding Chemical Substance Lists.”

#### 4.2.2 Regulatory Compliance for Processes

Comply with the regulations regarding prohibited chemical substances in processes and controlled chemical substances in processes, as stipulated in the document “Separate Volume: Corresponding Chemical Substance Lists.”

**Table 1: Green procurement requirement list**

<b>Environmental management system</b>	1. Establishment and Operation of the Management System of Environmental Conservation
	2. Establishment and Operation of the Management System for Chemical Substances in Products
<b>Environmental impact chemical substances</b>	1. Regulatory Compliance for Procurement Items
	2. Regulatory Compliance for Processes



**Table 2: Composition of chemical substances specified in The Standards**

<b>Environmental impact chemical substances</b>	<b>Procurement items</b>	1. Prohibited Chemical Substances
		2. Controlled Chemical Substances
	<b>Manufacturing processes</b>	1. Prohibited Chemical Substances in Manufacturing Processes
		2. Controlled Chemical Substances in Manufacturing Processes

## Section 2: Requests to Suppliers

### 1. Basic Agreement and Quality Assurance Agreement

Prerequisite to becoming a supplier to Nikon Group is concluding a “Basic Agreement and Quality Assurance Agreement.” Article 32 (Environmental Management) includes The Standards and related directives to be complied with. This provision signifies that the supplier consents to conform to The Standards as well as to cooperate upon request with Nikon in matters related to these standards. The Standards are to be confirmed upon concluding an agreement by suppliers.

For contracts with suppliers outside of Japan, all contracts are individual and require a conclusion of the separate “Nikon Green Procurement Standards Agreement.” For the agreements, inquire with a relevant procuring department of the Nikon Group.

	Item	Nikon Group	Supplier
At the start of being a supplier	Understanding of the supplier related contacts and the content of requirements	“Basic Agreement and Quality Assurance Agreement” (Article 32 (Environmental Management))	Conclusion
		“Nikon Green Procurement Standards”	Confirmation and agreement

Figure 1 Confirmation and measures for supplier related contracts and the environmental management system

### 2. Requests Related to the Environmental Management System

#### 2.1 Efforts towards Management of Environmental Conservation

##### 2.1.1 Establishment and Operation of the Management System of Environmental Conservation

In order to reducing the environmental burden that occurs during business activities, establishment of a system to manage environmental conservation is requested.

While a system certified by a third-party certification body is preferable, a supplier’s proprietary management system of environmental conservation is also acceptable. Nikon Group requests establishment of one of the following three systems as well as its appropriate operation <sup>(Note 5)</sup>.

- (1) System certified by ISO 14001
- (2) Management system of environmental conservation certified by third-party certification other than ISO 14001  
Eco-Action 21, Eco-Stage, KES, Compact Eco-System, Michinoku EMS (these are Japanese certification systems), etc.

- (3) Supplier’s proprietary management system of environmental conservation

The content and operational status is confirmed through an audit corresponding to the 2.4 Environmental Management System Audit.

For basic contents of the management system of environmental conservation required by the Nikon Group other than (1) or (2) shown above, see Appendix 3.

Also, for suppliers without an established management system of environmental conservation, support will be provided if necessary.

The prohibited chemical substances in manufacturing processes and controlled chemical substances in manufacturing processes shown in The Standards are generally included in the “Management of Environmental Conservation“.

### 2.1.2 Observance of Environmental Regulations Applicable to the Work Location

Suppliers are requested to observe all environmental regulations as well as any other requirements for the country or region in which their work location is located. The classifications of the main environmental regulations are as follows.

- (1) Regulations related to the appropriate collection and disposal of chlorofluorocarbons
- (2) Regulations related to controlled discharge and appropriate processing of waste (transportation, disposal, recycling, etc.)
- (3) Regulations related to sooty smoke, volatile organic compounds, dust, harmful air pollutants, and vehicle exhaust and gas output that have an effect on the atmosphere
- (4) Regulations related to drainage water from the work location to public water supplies
- (5) Regulations regarding noise, vibration, and odor
- (6) Regulations regarding hazardous chemical substances, poisonous substances, dioxins, and PCBs
- (7) Regulations regarding workers' health and safety

## 2.2 Efforts towards Management of Chemical Substances in Products

### 2.2.1 Establishment and Operation of the Management System for Chemical Substances in Products

Establishment and appropriate operation <sup>(Note 5)</sup> of a system for appropriately managing and reducing the chemical substances included in procurement products is requested.

Establishment should be implemented with a method that matches the suppliers scale, type of business, and type of operations.

Nikon Group recommends the “Guidelines for the Management of Chemical Substances in Products (Version 3.0)” published by the Joint Article Management Promotion-consortium (JAMP). As for reference, the relevant part of this document is shown in Appendix 4.

For suppliers yet without an established management system for chemical substances in products, support will be provided if necessary.

Also, for the content and operational conditions, verification may be performed by the “Nikon Environmental Management System Audit.”

### 2.2.2 Compliance with Regulations Related to Chemical Substances

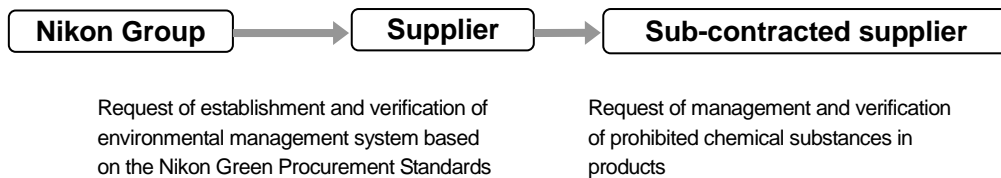
For regulations related to chemical substances included and other legal requirements, comply with the document “Separate Volume: Corresponding Chemical Substance Lists.”

### 2.3 Efforts in the Supply Chain

Nikon Group believes that it is necessary for each organization within the supply chain to make efforts in the establishment of the management system for chemical substances <sup>(Note 5)</sup>. Therefore, it is requested that our suppliers ask the sub-contracted suppliers to manage chemical substances and verify their management status.

Also, “Guidelines for the Management of Chemical Substances in Products (Version 3.0)”, recommended in the Nikon Green Procurement Standards, includes the items to be required and verified by our suppliers at the sub-contracted suppliers (4.4.3.2 Verification of the Management Status of Chemical Substances in Products at Supplier).

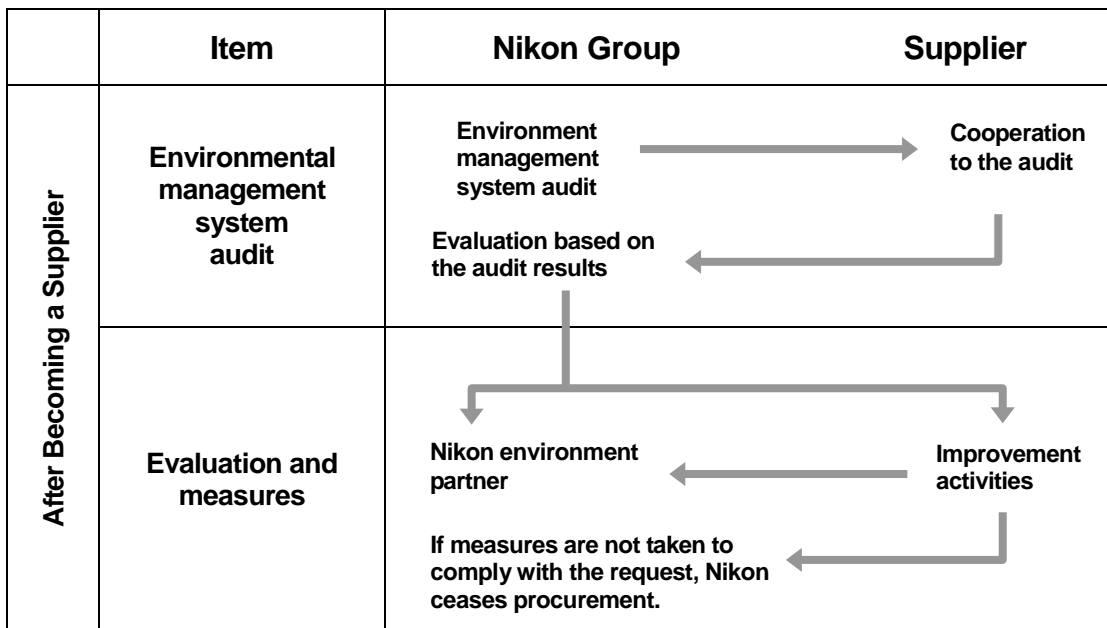
(Note 5) For information regarding “Establishing and Operating a Management System” common to both the Management System of Environmental Conservation and Management System of Chemical Substances in Products, see Appendix 2.



**Figure 2 Efforts towards management of chemical substances in products in the supply chain**

### 2.4 Cooperation to the Environmental Management System Audit

The Nikon Group may perform an environmental management system audit if necessary after a supplier starting business with the Nikon Group, so the supplier’s cooperation for that audit is requested. Also, depending on the evaluation using the results of the audit as a base, measures according to The Standards is taken. Details regarding the evaluation and measures are explained in Section 3, “Evaluation and Measures.”



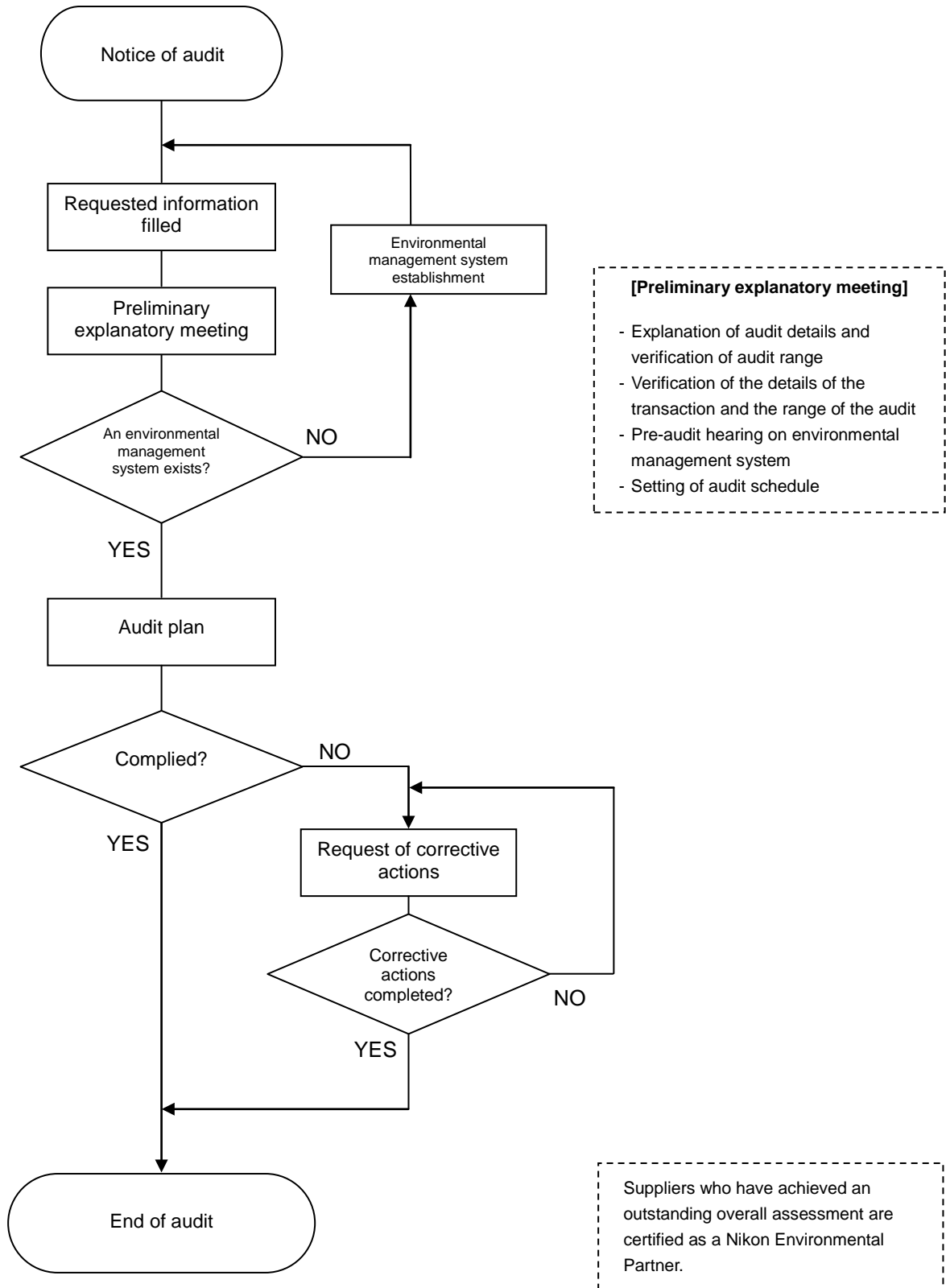
**Figure 3 Audit and evaluation response to the environmental management system**

**2.4.1 Contents and Targets of the Environmental Management System Audit**

- (1) The establishment and the operation status of the environmental management system specified by The Standards are verified in the environmental management system audit.
- (2) In addition to manuals, regulations, procedure manuals, records, and evidence, the manufacturing sites may also be checked.

**2.4.2 Environmental Management System Audit Procedure**

- (1) Nikon Group performs the audit after obtaining suppliers' consent to the audit. The audit file is sent at the time of request and the file with the supplier's information filled in is requested to be presented.
- (2) Before performing the audit, a preliminary explanatory meeting will be held to explain the content and procedure of the audit and determine the range and date of the audit. If an environmental management system is not verified, establishment of a system is requested. Consultation regarding the establishment method and support will be given if necessary.
- (3) After the preliminary explanatory meeting, the audit file with all required items filled in is requested to be presented before the audit.
- (4) For the audit, the Nikon Group audit team visits the suppliers' work site and spends a day checking the content input into the audit file. If it is found that everything complies, the audit ends at that time.
- (5) Depending on the results of the audit, corrective actions may be required. Cooperation is requested. In such cases, the audit is complete once corrections are made.



**Figure 4 Environmental management system audit flow chart**

### 3. Requests Regarding Environmental Impact Chemical Substances

#### 3.1 Regulatory Compliance with the Document “Separate Volume: Corresponding Chemical Substance Lists”

The Nikon Group has established the standards in the document “Separate Volume: Corresponding Chemical Substance Lists” regarding the environmental impact chemical substances used in procured products and their manufacturing processes, based upon applicable national environmental regulations, both in Japan and overseas, as well as related international conventions. Suppliers are requested to observe these standards. However, there are cases when the content of a request from each business unit or a group company may differ depending on the Nikon product, laws and regulations, or operating environment. For information regarding target materials, main laws and industrial standards, targets, thresholds, use examples, and exceptions, see the document “Separate Volume: Corresponding Chemical Substance Lists.”

##### (1) Prohibited Chemical Substances

For procurement items, inclusion of the prohibited chemical substances listed in the document “Separate Volume: Corresponding Chemical Substance Lists” over the threshold is prohibited. If no threshold is set, intentional addition is prohibited.

##### (2) Controlled Chemical Substances

If procured items contain controlled chemical substances listed in the document “Separate Volume: Corresponding Chemical Substance Lists,” the type, use location, use amount, use process, etc., are appropriately managed and should be reported immediately if requested by Nikon Group.

##### (3) Prohibited Chemical Substances in Manufacturing Processes

For manufacturing of procurement items, suppliers are requested not to use chemical substances prohibited from use in manufacturing processes listed in the document “Separate Volume: Corresponding Chemical Substance Lists.”

##### (4) Controlled Chemical Substances in Manufacturing Processes

For manufacturing procurement items, suppliers are requested to properly manage controlled chemical substances in manufacturing processes as listed in the document “Separate Volume: Corresponding Chemical Substance Lists.”

#### 3.2 Cooperation to the Survey of Chemical Substances

Nikon Group conducts a survey regarding chemical substances in procurement items and requests cooperation to the survey. The survey format and tools may differ depending on the Nikon business unit or group company. Follow the instructions of the relevant procuring department.

In addition to survey results, Nikon Group may ask your cooperation to submit analysis data, evidence, and a non-use guarantee.

#### 3.3 Submission of Alternative Products/Substances and Technologies

In order to eliminate the prohibited chemical substances in products and manufacturing processes, Nikon requests the cooperation of suppliers in submitting samples of the whole or part of products for evaluation and analysis, switching to alternative products or materials, and introducing alternative technologies.

### 3.4 Cooperation to Change Control

If there are changes to the items specified by Nikon Group business units or group companies, give notification immediately. Also, give prompt notification of any changes to the organization or management framework of the supplier.

### 3.5 Non-conformity Response

If non-conformities with the Nikon Green Procurement Standards are confirmed, report them immediately and comply with the responding measures required by Nikon Group.

**Table 3 List of requests to suppliers**

<b>Basic Agreement and Quality Assurance Agreement</b>	
<b>Environmental management system</b>	<b>1. Efforts Towards Management of Environmental Conservation</b>
	<b>2. Efforts towards Management of Chemical Substances in Products</b>
	<b>3. Efforts in the Supply Chain</b>
	<b>4. Cooperation to the Environmental Management System Audit</b>
<b>Environmental impact chemical substances</b>	<b>1. Regulatory Compliance for the Document “Separate Volume: Corresponding Chemical Substance Lists”</b>
	<b>2. Cooperation to the Survey of Chemical Substances</b>
	<b>3. Submission of alternative products and technologies</b>
	<b>4. Support for Change Management</b>
	<b>5. Non-conformity response</b>



## Section 3: Evaluation and Measures

### 1. Evaluation and Measures Related to the Environmental Management System

#### 1.1 Environmental Management System Improvement Requests and Support

Nikon Group will request improvements related to the environmental management system for suppliers who do not meet The Standards. Cooperation and support will be given as necessary.

In the event that a supplier proves, however, to be unwilling or incapable of implementing these improvements, Nikon further reserves the right to cease procurement.

#### 1.2 Nikon Environmental Partner

Upon completion of an environmental management system audit, Nikon Group certifies suppliers who have achieved an outstanding overall assessment as a Nikon Environmental Partner. It is important to bear in mind, however, that this certification relates to the supplier's environmental management system itself, not to procured products.

Nikon Group gives priority to doing business with suppliers that are Nikon Environmental Partners. Also, Nikon hopes to deepen mutual understanding and endeavors to boost mutual understanding that is beneficial to both Nikon and its suppliers as well as to contribute to the formation of a sustainable society.

##### (1) Requirements of Nikon environmental partner certification and effective period

Those who meet the requirements in "4.1. Environmental Management System" in "4. Green Procurement Requirements" of Section 1, The Standards as determined by the environmental management system audit results are recognized as an Environmental Partner. Certification will be given to the supplier. The effective period of the Nikon environmental partners is three years.

##### (2) Nikon environmental partner renewal

A renewal audit is performed to renew the effective period. The audit may consist of a check by the Nikon environmental management system audit team, by submission and verification of various documents, or both.

##### (3) Cancellation of Nikon environmental partner certification

If the supplier has deviated significantly from the certification requirement listed in part (1) above, certification will be cancelled.

### 2. Evaluation and Cooperation Related to Environment Impact Chemical Substances

Nikon Group requests regulatory compliance with the document "Separate Volume: Corresponding Chemical Substance Lists", cooperation to the survey about chemical substances, change control, and response to non-conformity. Also, Nikon Group may request submission of a non-use guarantee.

In the event that a supplier is found to be using any of the prohibited substances in products or manufacturing processes specified in The Standards, Nikon reserves the right to request the supplier to stop using the substance, replace it with an alternative substance, and/or introduce alternative technology.

For any supplier who does not comply with these requests from Nikon Group, Nikon Group reserves the right to cease procurement.

### **3. Revision of the Standards**

Nikon Group will undertake revision of The Standards as necessary to remain in step with changes in applicable laws and regulation or as stipulated by the expectations of the general public. Notification of revisions will be made in writing in a timely fashion. If necessary, notification of deadlines for complying with such revisions will be made in writing after mutual consultation.

### **4. Information Management**

Proprietary information provided to Nikon as a part of compliance with The Standards will be handled in the strictest confidentiality, as stipulated in the Nikon Basic Suppliers Contract\*. (\*Currently, only a Japanese version is available.)

## Appendix 1: Group companies (Current as of March 1<sup>st</sup>, 2018)

The number of Nikon Group Companies may change from time to time.

<b>Japan</b>			
1	Sendai Nikon Corporation	9	Nikon Engineering Co., Ltd.
2	Nikon Imaging Japan Inc.	10	Hikari Glass Co., Ltd.
3	Nikon Vision Co., Ltd.	11	Nikon–Essilor Co., Ltd.
4	Miyagi Nikon Precision Co., Ltd.	12	Nikon Optical Shop Co., Ltd.
5	Tochigi Nikon Precision Co., Ltd.	13	Nikon Business Service Co., Ltd.
6	Nikon Tec Corporation	14	Nikon Tsubasa Inc.
7	Nikon CeLL innovation Co., Ltd.	15	Nikon Systems Inc.
8	Nikon Instech Co., Ltd.	16	Tochigi Nikon Corporation

<b>The Americas</b>			
17	Nikon Americas Inc.	22	Nikon do Brasil Ltda.
18	Nikon Inc.	23	Nikon Precision Inc.
19	Nikon Canada Inc.	24	Nikon Instruments Inc.
20	Nikon Mexico, S.A. de C.V.	25	Nikon Metrology, Inc.
21	Nikon Latin America, S.A.	26	Nikon Research Corporation of America

<b>Europe</b>			
27	Nikon Holdings Europe B.V.	35	Nikon Precision Europe GmbH
28	Nikon Europe B.V.	36	Nikon Instruments Europe B.V.
29	Nikon GmbH	37	Optos Plc
30	Nikon U.K. Ltd. Nikon AG	38	Nikon Instruments S.p.A.
31	Nikon France S.A.S.	39	Nikon Metrology NV
32	Nikon CEE GmbH	40	Nikon Metrology GmbH
33	Nikon (Russia) LLC.	41	Nikon Metrology U.K. Ltd.
34	Mark Roberts Motion Control Limited	42	Nikon Metrology SARL

<b>Asia and Oceania</b>			
43	Nikon Holdings Hong Kong Limited	55	Nikon Lao Co., Ltd.
44	Nikon Asia Pacific Pte Ltd.	56	Nikon International Trading (Shenzhen) Co., Ltd.
45	Nikon Hong Kong Ltd.	57	Nikon Precision Korea Ltd.
46	Nikon Singapore Pte Ltd.	58	Nikon Precision Taiwan Ltd.
47	Nikon (Malaysia) Sdn. Bhd	59	Nikon Precision Shanghai Co., Ltd.
48	Nikon Australia Pty Ltd.	60	Nanjing Nikon Jiangnan Optical Instrument Co., Ltd.
49	Nikon India Private Limited	61	Nikon Instruments Korea Co., Ltd.
50	Nikon Sales (Thailand) Co., Ltd.	62	Nikon Instruments (Shanghai) Co., Ltd.
51	Nikon Middle East FZE	63	PT Nikon Indonesia
52	Nikon Imaging (China) Sales Co., Ltd.	64	Guang Dong Nikon Camera Co., Ltd.
53	Nikon Imaging Korea Co., Ltd.	65	Hang Zhou Nikon Camera Co., Ltd.
54	Nikon (Thailand) Co., Ltd.		

## **Appendix 2: Establishment and Operation of a Management System**

As shown in Chapter 2, “2. Requests Related to the Environmental Management System”, establishment and operation of a “Management System of Environmental Conservation” and a “Management System for Chemical Substances in Products” is requested. Basic contents are shown in Appendix 3 and Appendix 4, and the meaning of establishing and operating a management system common to both system is as follows:

The actual contents should desirably be performed in a method that matches the magnitude and actual situations of the organization. It is requested that a system with content that is applicable to the organization be established using Appendix 3 and Appendix 4 as a reference.

### **1. Establishment of a Management System**

For establishment of a management system, responsibilities and procedures are determined for the following items (1) to (7) and more in depth explanations can be documented if necessary.

- (1) Formulate a policy and notify the policy.
- (2) Clarify the applicable range of management.
- (3) The management framework and manager
- (4) Establish goals and plans.
- (5) Operation and management
- (6) Evaluation and revisions
- (7) Report the results to the manager.

### **2. Operation of the Management System**

Operation means performing the management system by following the responsibilities and procedures for the items (1) to (7) as described in “1. Establishment of a Management System” mentioned above, and recording logs of this process if necessary.

## **Appendix 3: Basic Management System of Environmental Conservation**

### **1 Environmental policy**

- (1) An environmental policy approved by management has been formulated.

### **2 Environmental management items**

- (1) The environmental management items (Note 6) for business activities, products, and services have been determined.

### **3 Environmental regulations**

- (1) The major environmental laws and regulations applicable to the selected environmental management items have been ascertained.

### **4 Environmental management system**

- (1) Business management has assigned a manager for environmental management.
- (2) On implementation of environmental management, who is in charge of what is was made clear and the range of responsibilities and authorities were determined.

### **5 Environmental training**

- (1) Training regarding environmental laws and regulations as well as training for emergencies has been performed.
- (2) Periodic checks are performed to confirm that employees hold necessary (legal) requirements for environmental conservation activities and that those abilities are retained.

### **6 Preparations and handling in emergency situations**

- (1) A response procedure for emergency situations such as fire or earthquake has been established. (Contact information, person in charge, regulations, measures)

### **7 Monitoring and measuring**

- (1) Monitoring/measurement results have been logged and managed.

### **8 Internal audit**

- (1) The system and operation is periodically checked with an internal audit or by some other method.

### **9 Revisions by management**

- (1) Revisions are instructed for corrective or preventative actions.

(Note 6) Environmental management item: an issue for which concrete actions should be taken for promotion of environmental conservation

## **Appendix 4: Guidelines for the Management of Chemical Substances in Products (Version 3.0)**

The “Guidelines for the Management of Chemical Substances in Products (Version 3.0)” published by the Joint Article Management Promotion-consortium (JAMP) is recommended. The relevant part of the document is shown below for reference.

### **4.1 Management of Chemical Substances in Products in General**

- The organization shall establish, document, implement, sustain and continuously improve the management system of chemical substances in products in accordance with the action items stated in the Guidelines.

### **4.2 Representation of the Management Policy of Chemical Substances in Products**

- Top managers of the management of chemical substances in products shall determine the management policy of chemical substances in products for the organization and shall address implementation of the effectual management of chemical substances in products.

### **4.3 Planning**

#### **4.3.1 Defining the management criteria of chemical substances in products**

- The organization shall determine and document the management criteria of chemical substances in products.

#### **4.3.2 Target and Implementation Plan**

- The organization shall set the target for management of chemical substances in products. The organization shall draw up, implement and sustain the implementation plan to achieve the target. The organization shall review the target and the implementation plan whenever needed.

#### **4.3.3 Defining Responsibility and Authority**

- The organization shall determine responsibilities and authorities to implement management of chemical substances in products effectively.

#### **4.3.4 Internal Communication**

- The organization shall establish a procedure for the internal communication and shall notify the policy, the management criteria of chemical substances in products, the target, the implementation plan, responsibilities and authorities to all related departments.

### **4.4 Operation and Management**

#### **4.4.1 Operation and Management in General**

- For the purpose of producing products which can fulfill the management criteria of chemical substances in products, management of chemical substances in products shall be implemented at the respective stage of design and development, purchasing, manufacturing and delivery.

#### **4.4.2 Management of Chemical Substances in Products at Design and Development**

- For the purpose of producing products which can fulfill the management criteria of chemical substances in products in the stage of design and development, the organization shall define clearly and document the management criteria of chemical substances in products at the respective stage of purchasing, manufacturing and delivery in accordance with products and the type of business operation.

#### **4.4.3 Management of Chemical Substances in Products at Purchasing**

##### **4.4.3.1 Collection and Verification of Information of Chemical Substances in Products**

- The organization shall present the management criteria of chemical substances in products for purchasing (hereinafter referred to as “the purchase management criteria”) to suppliers, and collect necessary information of chemical substances in products. The organization shall verify if information of chemical substances in the purchased products satisfies the purchase management criteria and record the result accordingly. The organization shall complete collection and verification of the information of chemical substances in products in accordance with the purchase management criteria before start of manufacturing.

##### **4.4.3.2 Verification of the Management Status of Chemical Substances in Products at Supplier**

- When the organization selects the supplier, the organization shall verify and record the management status of chemical substances in products at the supplier. In case that the organization continues business with the supplier, for the purpose of fulfilling the management criteria of chemical substances in products, the organization shall verify and record the supplier’s management status of chemical substances in products again whenever necessary. The organization shall define the actions against the outcome of the supplier’s management status prior to verification.

##### **4.4.3.3 Management of Chemical Substances in Products at Receiving**

- The organization shall verify purchased products upon receiving if they fulfill the purchase management criteria of the organization and record accordingly.

#### **4.4.4 Management of Chemical Substances in Products for the Manufacturing Process**

##### **4.4.4.1 Management of Chemical Substances in Products for the Manufacturing Process in General**

- The organization shall manage the manufacturing processes in accordance with the management criteria of chemical substances in products for manufacturing processes and record the result accordingly.

##### **4.4.4.2 Prevention of Contamination by Incorrect Use or Admixture**

- The organization shall implement the preventive measures against contamination by incorrect use or admixture of declarable chemical substances under the management criteria of chemical substances in products.

#### **4.4.5 Management at Delivery**

- Before the organization delivers products, the organization shall verify products if they satisfy the management criteria of chemical substances in products for delivery and record the result accordingly. At receiving or at the manufacturing process, the organization shall

verify again to ensure that all predetermined check items are completely confirmed. The organization shall also manage to prevent contamination by any incorrect shipment or mixed-up in the product warehouse.

#### **4.4.6 Verification of the Management Status of Chemical Substances in Products at Outsourcing**

- In case that the organization outsources some processes such as product design and development or manufacturing to another organization, the organization shall verify the management status of chemical substances in products at the outsourcing organization to ensure that the management criteria of chemical substances in products can be complied and shall record the result accordingly.

#### **4.4.7 Traceability**

- The organization shall assure traceability of the information of chemical substances in products by appropriate manners in order to grasp, utilize, disclose and transfer the information of chemical substances in products swiftly.

#### **4.4.8 Exchange of Information with the Customer**

- The organization shall clearly define and implement the effective method of exchanging information with the customer for the following matters, and record details of such information exchange.
  - a) Laws, regulations and the industry criteria that are required by the customer to comply
  - b) Information of chemical substances in products
  - c) Information on the management of chemical substances in productsIn case that any change is to be made to the information of chemical substances in products, the organization shall notify the customer prior to such a change.

#### **4.4.9 Change Management**

- The organization shall extract changeable elements which may affect declarable chemical substances under the management criteria of chemical substances in products. When any change arises, before the actual change is taken place, the organization shall effectually confirm a change to be made to the information of chemical substances in products and verify if the management criteria of chemical substances in products can still be fulfilled. The organization shall document the procedures of change management and record the result of change.

#### **4.4.10 Response to Occurrence of Nonconformity**

- The organization shall develop and document the method of in-house contacts, the method of contacting suppliers, outsourcing organizations and customers as well as the temporary corrective actions, in order to correspond to any nonconformity arising relating to chemical substances in products. After the temporary measure is taken, the organization shall investigate and identify the cause, determine and implement the necessary countermeasures to prevent recurrence of nonconformity. The organization shall take the preventive measures to avoid any occurrence of nonconformity. The organization shall record the responses taken at nonconformity.



## **4.5 Management of Human Resources, Documentation and Information**

### **4.5.1 Education and Training**

- The organization shall develop the contents of each management and operation module that are necessary to train and educate for management of chemical substances in products. The organization shall identify works and personnel to be engaged in management of chemical substances in products, and conduct the necessary training and education, and record accordingly.

### **4.5.2 Management of Document and Record**

- The organization shall manage the documents including “the procedures of documentation” and the records as required in the action items of the Guidelines as well as the procedures and the records which are determined by the organization as necessary.

## **4.6 Evaluation and Improvement of Implementation Status**

- The organization shall evaluate the management status of chemical substances in products periodically at a predetermined frequency. The organization shall implement corrective actions to matters which require correction. The organization shall record the result of evaluation and the corrective actions and report it to top managers of the management of chemical substances in products. The top management in chemical substances in products shall review the result of evaluation and the corrective actions.

Revision History		
Date	Edition	Description
Oct. 1, 2005	1.0	First edition
Oct. 1, 2006	2.0	Partial revisions of typographical errors
April 1, 2008	3.0	<ul style="list-style-type: none"> <li>• New structure, including combining section 3.3.3 <i>Requests for cooperation</i> with section 4. <i>Operations</i> as section 4. <i>Procedures for Nikon Green Procurement Standards</i></li> <li>• Revisions to content of Section 1. <i>Nikon's Commitment to the Environment</i>: <ul style="list-style-type: none"> <li>1. <i>Introduction</i></li> </ul> </li> <li>• Revisions to Section 2. <i>Nikon Green Procurement Standards</i>: <ul style="list-style-type: none"> <li>1. <i>Objective</i></li> </ul> </li> <li>• 3.2.1 Chemical substances standard in procured products Eliminated "limited substances"; added <i>Special examples for batteries and Precautions when using polyvinyl chloride to Prohibited Substances</i>; added <i>Restricted substances in packaging</i>; and added <i>Restricted substances in equipment and tools</i>.</li> <li>• 3.2.2 <i>Chemical substances standard in manufacturing processes</i> was revised to include hexavalent chromium as a controlled chemical substance.</li> <li>• Added further detail to 2. <i>Scope</i> and 3.1 <i>Requirements for environmental management systems</i></li> <li>• Added new section: 7. <i>Handling of information from all suppliers</i></li> </ul>
Oct. 1, 2008	3.1	<ul style="list-style-type: none"> <li>• 3.1.2 Establishment of environmental impact substances management system <ul style="list-style-type: none"> <li>• Added 8. <i>traceability</i> to Table 1: <i>Environmental impact substances management system</i></li> </ul> </li> <li>• 3.2.1 Chemical substances standards in procured products <ul style="list-style-type: none"> <li>• Added 17. <i>Perfluorooctane sulfonates (PFOSs)</i> to Table 2: <i>Prohibited chemical substances in procured products and their threshold amount</i></li> <li>• Added (5) <i>About perfluorooctane sulfonates (PFOSs)</i></li> <li>• Added further detail to Table 3: <i>Examples of uses of PVC</i></li> </ul> </li> <li>• Revisions to (6) <i>Applications exempted by the prohibited substances standards: The use of Deca BDE in polymeric applications</i></li> <li>• Added new exemptions from prohibition to (6) <i>Applications exempted by the prohibited substances standards: The use of Deca BDE in polymeric applications: a) Cadmium and its compounds and c) Lead and its compounds</i></li> </ul>
Aug. 1, 2010	3.2	<ul style="list-style-type: none"> <li>• Added another type of procured product to 2. <i>Applicable Scope</i></li> <li>• Added 3. <i>Definition of Terms</i></li> <li>• Added <i>Management System of Chemical Substances in Products</i> to 4.1.2. <i>Establishment of Management System of Chemical Substances in Products</i></li> <li>• Changed the names of types of chemical substances in 4.2 <i>Requirements for environmental impact chemical substances</i></li> <li>• Updated (6) <i>Exempted applications where prohibited chemical substances in products are allowed to be used</i> in 4.2.1. <i>Chemical substances standards in products</i> 1) <i>Prohibited chemical substances in products</i></li> <li>• Changed the number of phthalate compounds from three to six, and added a provision regarding SVHC under the EU REACH Regulation in 4.2.1. <i>Chemical substances standards in products</i> 2) <i>Controlled chemical substances in products</i></li> <li>• Upgraded Annex 5: <i>Class I Specified Chemical Substances under Japanese Act on the Evaluation of Chemical Substances and Regulation of Their Manufacture, etc.</i></li> </ul>
Apr. 1, 2012	3.3	<ul style="list-style-type: none"> <li>• Added another type of procured product to 2. <i>Applicable Scope</i></li> <li>• Added another 6 substances to Table 1: <i>Prohibited chemical substances in products and their threshold amount</i> in 4.2.1. <i>Chemical substances standards in products</i> 1) <i>Prohibited chemical substances in products</i></li> <li>• Deleted Annex 2: <i>Nikon Green Procurement Standards Agreement</i></li> <li>• Added Annex 3: <i>Exempted applications where prohibited chemical substances in products are allowed to be used</i></li> <li>• Added Annex 4: <i>Exempted applications where prohibited chemical substances in products for medical, monitoring and control equipment are allowed to be used</i></li> <li>• Added Annex 5: SVHC's in REACH</li> </ul>
Mar.1, 2013	3.4	<ul style="list-style-type: none"> <li>• Added notes *6 and *7 in 4.2.1. <i>Chemical substances standards in products</i> 1) <i>Prohibited chemical substances in products</i>.</li> <li>• Updated Annex 3: <i>Exempted applications where prohibited chemical substances in products are allowed to be used</i> and Annex 5: SVHC's in REACH.</li> </ul>

<p>April 1, 2014</p>	<p>4.0</p>	<ul style="list-style-type: none"> <li>• Made "Separate Volume: Corresponding Chemical Substance Lists" a separate document (removed the data that related to chemical substance)</li> <li>• Moved the policies to the back cover</li> <li>• Changed the structure to Section 1 "Nikon Green Procurement Standards", Section 2 "Requests to Suppliers", Section 3 "Evaluation and Measures"</li> <li>• Removed "Definition of Terms"</li> <li>• Added "2. Basic Philosophy Regarding Green Procurement" in Section 1.</li> <li>• Added "4.2 Environmental impact chemical substances" in Section 1</li> <li>• Added "2.1.2 Observance of Environmental Regulations Applicable to the Work Location" and "2.2.2 Compliance with Regulations Related to Chemical Substances" to Section 2, "2. Requests Related to the Environmental Management System"</li> <li>• Added "2.3 Efforts in the Supply Chain" to Section 2</li> <li>• Added a detailed explanation to "2.4 Cooperation to the Environmental Management System Audit" in Section 2</li> <li>• Added "3.1 Regulatory Compliance for the Document "Separate Volume: Corresponding Chemical Substance Lists" in Section 2</li> <li>• Added "3.5 Change Control" in Section 2</li> <li>• Added "3.6 Non-conformity response" in Section 2</li> <li>• Added "1.2 Nikon Environmental Partner" in Section 3</li> <li>• Added "Appendix 3: Establishment and Operation of a Management System"</li> <li>• Added "Appendix 4: Basic Management System of Environmental Conservation"</li> <li>• Added "Appendix 5: Guidelines for the Management of Chemical Substances in Products (Version 3.0)"</li> </ul>
<p>April 1, 2015</p>	<p>4.1</p>	<ul style="list-style-type: none"> <li>• Amended "(2) Procured products, 3) Packaging" in "3. Applicable Scope" in Section 1</li> </ul>
<p>April 1, 2018</p>	<p>4.2</p>	<ul style="list-style-type: none"> <li>• Removed (2) and changed part of (1) in "2.1 Selection of Procurement Items" in Section 1</li> <li>• Integrated "4.2.2 Regulatory Compliance for Packaging Materials" to "4.2.1 Regulatory Compliance for Products" and renamed as "4.2.1 Regulatory Compliance for Procurement Items" in Section1</li> <li>• Integrated "3.2. Submission of a Non-use Guarantee" to "3.3. Cooperation to the Survey of Environmental Impact Chemical Substances" and renamed as "3.2 Cooperation to the Survey of Chemical Substances" in Section 2</li> <li>• Changed part of words in "2. Evaluation and Cooperation Related to Environment Impact Chemical Substances" in Section 3</li> <li>• Updated "Appendix 1: Group Companies" as of March 1, 2018</li> <li>• Removed "Appendix 2: Non-use Guarantee (Example)"</li> <li>• Replaced the Nikon Basic Environmental Management Policy with the Nikon Environmental Activity Guidelines</li> <li>• Updated the Nikon Basic Procurement Policy to the latest version</li> </ul>

## Nikon Environmental Activity Policy

In accordance with Nikon's corporate philosophy of "Trustworthiness and Creativity," we are committed to conducting all of our businesses based on the following policy goals for the purpose of passing on a healthy environment that serves as a base for a sustainable society to future generations.

\* Nikon collectively means Nikon Corporation and the Nikon group companies.

We recommend our affiliated companies to follow this or an equivalent policy.

### ●Effective use of resources

We will promote energy conservation as well as reduction, reuse, and recycling of resources including water and raw materials in order to reduce our environmental burdens such as greenhouse gases and waste.

### ●Environmental considerations for products

We will perform environmental and safety assessments, including those to conserve biodiversity, at every stage of planning, development and design in order to provide products that fully comply with our environmental protection aims and objectives.

### ●Environmental considerations throughout product life cycles

We will develop eco-friendly technologies and actively introduce materials and equipment at every stage of product life cycles (production, distribution, use, disposal, etc.) in order to minimize our environmental burdens.

### ●Compliance with related laws and other requirements

We will develop and follow rigorous code of standards, comply with all relevant environmental conservation treaties, international and regional laws and regulations as well as responding to requests from stakeholders.

### ●Prevention of environmental pollution

We will cautiously use chemical substances to minimize health, safety, and environmental risks and strive to prevent environmental pollution.

### ●Collaboration with stakeholders

We will participate in environmental protection programs, including addressing climate change issues and conserving biodiversity in cooperation with our stakeholders. We will also actively disclose and provide information to stakeholders and work together to reduce our environmental burdens.

### ●Education

We will conduct ongoing education programs to raise environmental awareness of our employees and promote their involvement in environmental activities.

● **Continuous improvement**

To achieve the above goals, we will set environmental objectives and targets and strive to meet them and reduce our environmental burden through continuous improvement of our environmental management system and work efficiency.

## **Nikon Basic Procurement Policy**

Our approach is that our suppliers and Nikon are partners working together to build a better society with our products and solutions. Under this approach, we work to understand each other, build a relationship of trust, and prosper together.

### **1. Sustainable corporate activities**

Nikon shall conduct sustainable and fair corporate activities, while not only complying with applicable laws and accepted social norms, but tackling social issues such as forced labor, child labor, and environmental destruction.

Nikon shall also encourage socially responsible behavior within its supply chain.

### **2. Open-door procurement**

Nikon procures products and solutions from global suppliers in as transparent a fashion as possible.

### **3. Procurement based on the concept of fair competition**

Based on the principles of fair and free competition, Nikon assigns top priority to suppliers that offer superior performance in terms of quality, cost, delivery, technology, and corporate reliability that includes social responsibility initiatives.

\* "Nikon" refers to "Nikon Corporation and its domestic and overseas subsidiaries." Affiliates are encouraged to follow these Guidelines or to implement similar standards.  
Nikon shall also encourage socially responsible behaviour within its supply chain.