Fukui Byora Group

Supplier Sustainability Declaration

4th Edition

Fukui Byora Co., Ltd.

Quality Assurance Department

Established: 9/26/2005
Revised: 14/11/2013
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Table of Contents

0. Revision record

Edition no.	Date	Contents	Development	Inspection	Approval
Initial Edition	2005/9/26	Newly enacted (Initial edition)	Quality Assurance Department	ISO Commission	Top Management Committee
1st Edition	2006/11/7	3. Guideline 4. Selection criteria, evaluation instigation, and entry review 5. Revised appendix of chemical substances management rank terminology and definitions guide Table 1, 2：Added and deleted prohibited substances Table 4: Reviewed and added to the list of examples of common substances Table 5: Analysis methodology schedule details Table 7: Added product review operations evaluation procedure Table 8: Added Fukui Byora management standards	Quality Assurance Department	ISO Commission	Management
2nd Edition	2007/12/21	Revision accompanying company reorganization (Elimination of Byora Seiko and Byora Technical Service)	Quality Assurance Department	—	Management
3rd Edition	2009/7/1	General revision	Quality Assurance Department	System Commission	Management
4th Edition	2013/11/14	Table 1 Updated of information contained in the law Updated Fukui Byora group Itemized exemption	Quality Assurance Department	Management	Management

1. Objective

Fukui Byora, in accordance with environmentally conscious companies, aims toward an assurance of protection of and harmony with the environment in our promotion of high efficiency and sustainable manufacturing. In addition, world wide regulation of chemical substances is becoming increasingly stringent year by year and high quality products with a guarantee of environmental safety is increasingly becoming a business requirement. In order to offer environmentally safe products to our customers, we ask our suppliers to promote conservation and consider "environmental quality assurance" a priority. We call for your (our suppliers) understanding in this endeavor and Fukui Byora group thanks you for your support.

2. Application

The scope of this guideline is as follows.

2.1 Consignment Subcontracting

(1) Designed by Fukui Byora group and processed and commissioned products.
  a. Purchased products
  b. Processed by cutting, machining, pressing etc.
  c. Processing such as plating, painting and heat treatment
(2) Dies and process to die

2.2 Materials
Parts, materials, equipment, etc. purchased by Fukui Byora Group

(1) Materials (metals, resins, etc.)
(2) Packaging materials (ink, adhesives and other structural material including tape)
(3) Processing oil, detergents, lubricants, anti-rust oil, WAX and other chemical products
(4) Items which contact the product in processing such as gloves, testing tools, cases, trays, etc.
(5) Dies materials
(6) Paint

2.3 Packing Materials
Packaging materials for items (from 2.1 and 2.2 above) subject to delivery to Fukui Byora Group.

2.4 Production Facilities, Ancillary Equipment and Associated Parts
Lubricants, refrigerants and other materials requiring regular maintenance such as paints, etc.

3. Operations

Operation guidelines as follows:

3.1 Substances not stipulated in this declaration still require adherence to all applicable local laws, ordinances and regulations.

3.2 Substances not stipulated in this declaration are still subject to investigation upon customer request.

3.3 Products not covered in the range of this declaration may still be required to comply to the relevant guidelines.

3.4 Items in this declaration are subject to timely reviews, as necessary.

3.5 Individual consultations will be conducted to determine acceptability of the guideline criteria contained herein.

4. Definition of Terms

4.1 Chemical substances management rank

The regulated chemical substances should be sorted and classified by rank.

(1) Level A Substances

Substances which are prohibited by customer demand or due to national or international regulations, or products containing such substances. Intentional use is banned. When a regulated value exists, the amount must be kept below the minimum threshold, including impurities. Even usage under the intentional control value is prohibited, so in this case, immediately cease, discontinue use and issue a report.

(2) Level B Substances

Substances with a high probability of future restrictions or prohibitions being imposed.

When such substances are used or contained in a product, a report detailing such use and delineating substitutions must be produced upon request.

(3) Level C Substances

Not intended to restrict use, but additional usage information is required by the customer from the third party vendor. When such a request is made, please be prepared to provide such information.

4.2 Usage

There are two classifications, “intentional use” and “non-intentional use”. Fukui Byora prohibits the intentional use of prohibited substances (those substances in the A group above).

(1) Intentional use

Substances with desired characteristics that may, upon contact, adhere to and be incorporated with the product.

ex. Substances such as methylene chloride used to clean components after processing

(2) Non-intentional use

Substances which may be contained as impurities in the materials used in processing, even when they do not adhere to the product.

ex. Substances such as PAH contained in the mineral oil and processing oil

4.3 Impurity

A substances contained in natural materials but which cannot be fully eliminated during the refining process, or which is generated in a reaction process but cannot be eliminated technically.

5.1 Document Submission

Document submission procedures are detailed below, please confirm.

5.1.1 Submitting documents

	Document Submission	Submission Form	Document Creation Procedure (Reference examples)
①	Environmentally hazardous banned substance compliance (Form - 0001)	Written document (signed or sealed original) *No electronic data	5-2. Refer to the “Environmentally hazardous banned substance compliance” and “Table of chemical substances”
②	Table of chemical substances (form - 0002)	Excel format	5-2. Refer to the “Environmentally hazardous banned substance compliance” and “Table of chemical substances”
③	Accurate Analysis Date	Physical document or electronic data	5-3. Refer to “Accurate Analysis Data”
④	MSDS	Physical document or electronic data	5-4. Refer to MSDS (Material Safety Data Sheet)

Note 1: For ③ & ④ above, we ask that electronic data be in PDF or JPEG format.
Note 2: For ③ & ④ above, when submitting physical documentation, we ask that an easily distinguishable table of contents be included.
Note 3: Although FAX submission of the above documents is accepted on a preliminary basis, we ask that originals must be properly submitted and received at a later date.

5.1.2 Form acquisition procedure

(1) Fukui Byora home page (download access from http://www.byora.co.jp).
(2) Vendors, please inquire from your contact at Fukui Byora or request directly to the Quality Assurance Department.

5.1.3 List of additional required documents

Summary list of required documentation.

Scope	Item	① Environmentally hazardous banned substance compliance Form	② Table of Chemical Substances	③ Data Analysis	④ MSDS
2.1	Purchased products	○	○	○	○
	Cutting and press processing	○	○	※1	※1
	Heat treatment and isonite	○	○	※1	※1
	Passivation	○	○	※1	※1
	Black oxide coating	○	○	※1	※1
	Chemical polishing and kirinsu processing	○	○	※1	※1
	Alumite	○	○	○	○
	Plating	○	○	○	○
	Coating/painting	○	○	○	○
	GEOMET coating	○	○	○	○
	Die, mold	○	○	○	○
	Die/mold processing	○	○	○	○
2.2	Raw material	○	○	○	○
	Packaging materials	○	○	○	○
	Processed oil, lubricant, cleaner	○	○	○	○
	Rust prevention oil, Wax, color change inhibitor etc	○	○	○	○
	Paint	○	○	○	○
	Die material	○	○	○	○
	Items used in processing by Fukui Byora, such as inspection tools and gloves, cases, trays, and other items that have contacted or been exposed to the product.	○	○	○	○
2.3	Packaging and delivery materials	○	—	—	—
2.4	Lubricants, refrigerants, paints and other such items necessary for periodic maintenance.	○	—	—	—

※1 For rust prevention oil, processed oil, discoloration inhibitor and other such substances which may adhere to the product, please submit “MSDS” and “Data Analysis” forms to Fukui Byora Group.

5.2 Regulated Material Compliance and Table of Chemical Substances

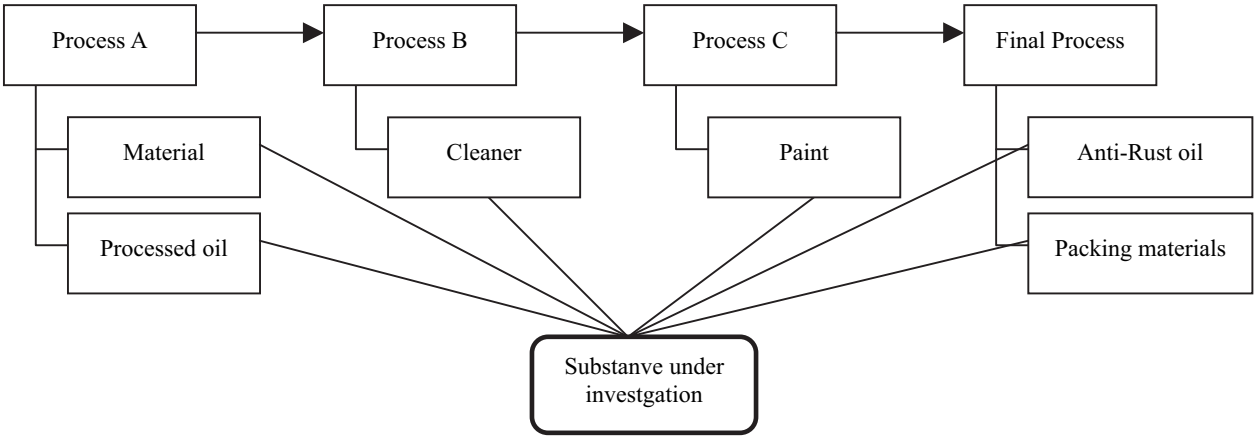
When submitting documentation of banned substances, the following procedures must be followed.

5.2.1 Points to observe in research

When researching a substance, the entire supply chain must be investigated.

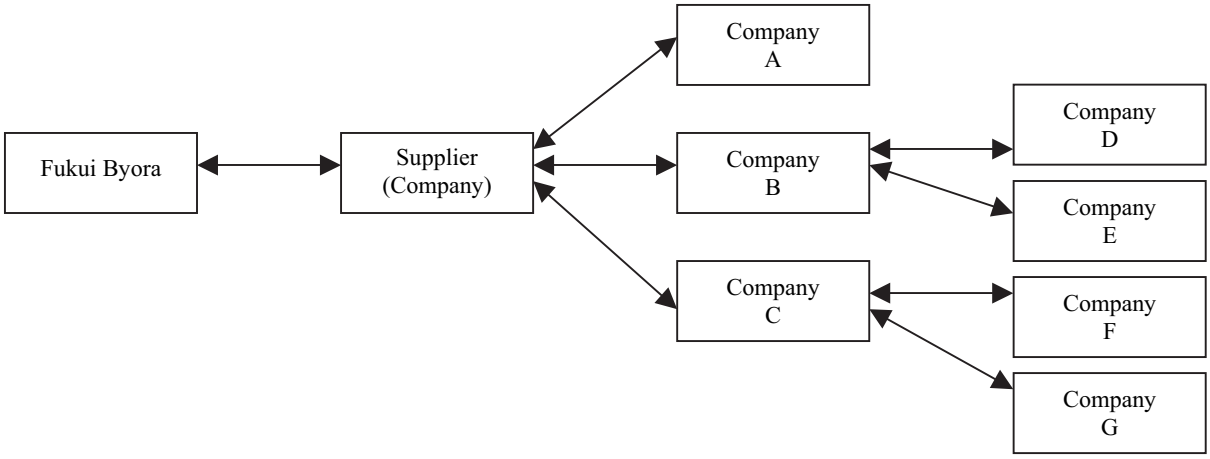
(1) Manufacturing process examples

Each substance under investigation must be researched through each process undergone.



(2) Secondary and tertiary suppliers

Please additionally conduct research for all secondary and tertiary suppliers



5.2.2 Handling and treatment of the chemical substance table and banned materials

When investigating secondary or tertiary suppliers, using the chemical substance table and banned materials from the Fukui Byora group is acceptable. When doing so, please modify the name of the supplier and destination.

5.2.3 Upon submission

Submit aggregate investigative reports for secondary and tertiary suppliers including supplier names and the chemical substance table and banned materials.

5.2.4 Details on each system

See banned substances (form 0001) and chemical substance table (form 0002) for a detailed explanation with samples of each respective procedure and ensure sufficient verification.

5.3 Accurate Analysis Data

5.3.1 High accuracy analysis

Accurate data for analysis is required for every instance of homogeneous material.

For example, full understanding of the chemical substances in components subjected to surface treatment is required to obtain accurate data analysis in each separate material including plating material.

5.3.2 Precision analyzing equipment

We recommend the following equipment for precision analysis.

Other equipment than that described below and in 5.3.4 which can offer guaranteed accurate results may also be utilized.

Chemical Name	Measurement Equipment
Lead (Pb), Cadmium (Cd) Associated chemical compounds	ICP optical emission spectrometry (ICP-OES) ICP mass spectrometry (ICP-MS) Atomic absorption spectrophotometry (AAS and FLAAS)
Mercury (Hg) Associated chemical compounds	Reduced Vaporized ICP optical emission spectrometry (ICP-OES) Reduced Vaporized ICP mass spectrometry (ICP-MS) Reduced Vaporized atomic absorption spectrophotometry (AAS, FLAAS)
Hexavalent Chromium (Cr^{6+}) Associated chemical compounds	Absorptiometer (Diphenylcarbazide method) Ion chromatography (IC) ※Chromate treatment is limited to EN15205 method.
Specified brominated flame-retardants (PBB、PBDE)	High resolution gas chromatograph mass spectrometry (HRGC/HRMS)

Note: Devices such as the fluorescence energy dispersive x-ray analyzer (EDX - RF) and wavelength dispersive fluorescent x-ray analyzer (WDX - RF) and other such simple measuring instruments are not allowed.

5.3.3 Requisite statement of particulars on precise analysis data

In principle, analysis data must be submitted to an acceptable third party (ISO17025 acquisition agency).

(1)Preprocessing methodology

When using a named official methodology, show where the methodology differs, and ensure that when, in effect, it has been completely dissolved in preprocessing that such is properly indicated.

(2)Measuring method

Please indicate the measuring methodology official name.

(3) Note the measurement name, the responsible party's name, and the measuring facility's name.

(4) Measurement date

(5) Measurement results

With N.D. (not detectable) results, describe the minimum detection concentration.

(6) Measurement flowchart

5.3.4 Analytical precision

Each substance should have a declared quantitation limit, as below.

Chemical Name	Pb	Cd	Hg	Cr^{6+}	PBB	PBDE
Quantitation Limit	20ppm	5ppm	2ppm	2ppm	5ppm	5ppm

5.3.5 Provide accurate data for analysis

(1) Analysis differs according to the substance, for example metallic and nonmetallic.

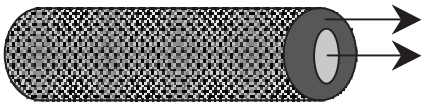
	Example	Test Item					
		Pb	Cd	Hg	Cr6+	PBB	PBDE
Metal	Material (metal) Surface treatment, plating (metal) etc.	○	○	○	○	—	—
Non-metal	Processing oil, packing materials (heavy duty polyethylene bag, cardboard etc)	○	○	○	○	○	○

(2) The accuracy of analyzed data is considered to be valid for a period of one year.

Data validity will expire one year from the date of analysis, update upon expiration.

5.3.6 Accurate analysis notes

(1) Material

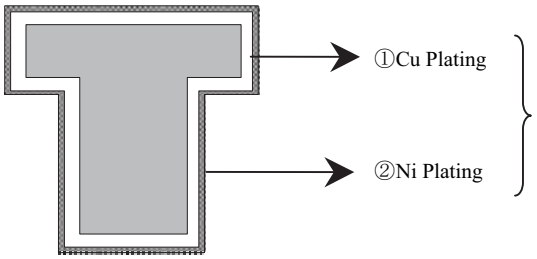


※ For composite wire rods (such as clad material) separate analysis of the core and cladding is required
(Also in the case of a base metal reflow line, separate analysis of the plating is required)

(2) Coating material

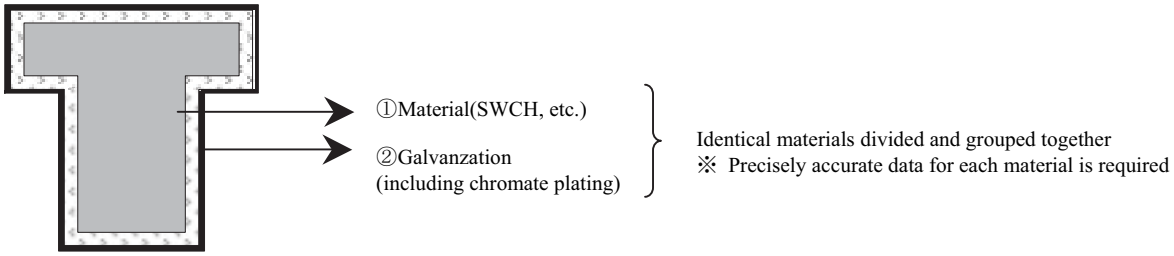
Analysis data for substances the material may have come in contact with, such as lime and rust prevention oil, must also be submitted.

(3) Plating processing (Cu plating and Ni plating)



※ Always execute separate analysis for Cu plating and Ni plating.
※ If Cu plating and Ni plating in the same component are analyzed together, the results are considered flawed.

(4) Regarding trivalent chromate for zinc-plated products



※ Chromate treatment, zinc plating consists of galvanized+chromate coating.
Because galvanized material cannot be separated from the chromate coating, please follow the procedure outlined below.

A. Example of preparing chromate plating sample for analysis

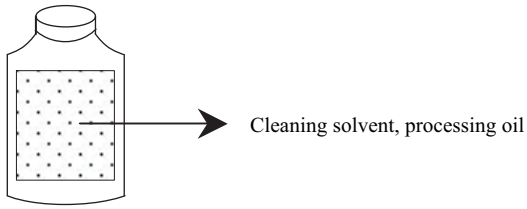
① Prepare an appropriately sized thin slat (SUS304) for plated material.
② Execute galvanization processing on the SUS304.
③ Execute chromate processing.
④ Peel off the galvanized sheet (including the chromate coating) from the SUS board.
⑤ The created galvanized material (including the chromate coating) can be used as the analysis sample.
※ Additionally, the dissolution test for hexavalent chromium may also be used.

B. Chromate plating analysis methodology

For lead, cadmium, mercury, PBB and PBDE, calculate density on the basis of the weight of the chromate plating (galvanized chromate membrane).

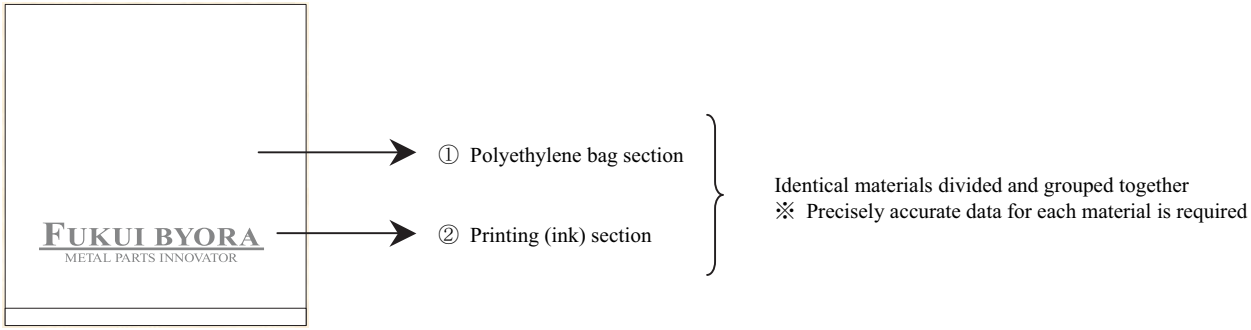
(For Hexavalent Chromium, please follow the analysis procedure for EN15205 method)

(5) Processing oil and other cleaning agents



※ Only execute the analysis on the cleaning agents, processing oils etc themselves. Packaging materials such as plastic containers, drums and etc do not need to be included in the analysis. Execute analysis.

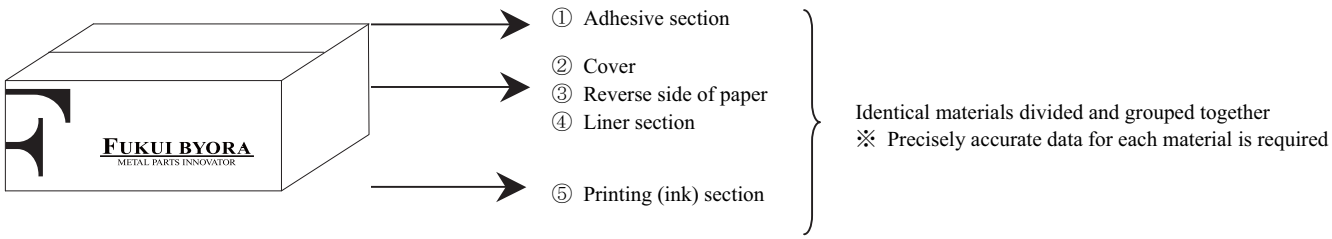
(6) Packaging materials (Heavy duty polyethylene bags)



※ Polyethylene bags as written above consist of the bag section and the printing section.
Submit accurate analysis separately for each component. When submitting analytical data for plastic based raw materials, include separately analysis data for each additive. (Submitting data analysis for precision molded material is acceptable.)

※ Since packaging materials may contain lead, cadmium, and mercury the total concentration of chromium 6 has been applied at less than 100ppm.

(7) Cardboard



※ As above, cardboard, adhesive, cover, paper's reverse, liner and ink are construed as being in the ink section. Accordingly, execute precise analysis for each material together with the raw materials.

5.4 MSDS (Material Safety Data Sheet)

5.4.1 Submitting the MSDS

In principle legally, the finished product data must be submitted, however, when it is difficult to define a “finished product”, submit an MSDS of the chemicals and other materials used in treatment. (If there is a lack of technical expertise for such submission, please contact the Fukui Byora group and confer outside of these parameters.)

5.4.2 Submitting MSDS explanation

Attach an explanation only where necessary, use the following guidelines when submitting the MSDS.

(1) Purchased products
- ・Raw Materials
- ・Rust prevention oil
- ・Processing oil, etc. (when included at delivery)

(2) Processing such as cutting and pressing
- ・Rust prevention oil
- ・Processing oil, etc. (when included at delivery)

(3) Heat treatment and isonite
- ・Rust prevention oil
- ・Other chemicals (when included at delivery)

(4) Kirinsu
- ・Discoloration inhibitors (when included at delivery)

(5) Passivation
- ・Rust prevention oil, etc (when included at delivery)

(6) Black oxide coatings
- ・Rust prevention oil, etc (when included at delivery)

(7) Chemical polishing
- ・Discoloration inhibitor
- ・Rust prevention oil, etc (when included at delivery)

(8) Alumite
- ・Anodized aluminum and dye used to color
- ・Sealer

(9) Plating
- ・Plated membrane
- ・Sealer
- ・Discoloration inhibitor
- ・WAX, etc (when included at delivery)

(10) Painting
- ・Painting material
- ・Thinner
- ・Primer, etc

(11) Die
- ・Die material
- ・Rust prevention oil, etc (when included at delivery)

(12) Die processing
- ・Surface coating
- ・Rust prevention oil, etc (when included at delivery)

(13) Material
- ・Materials
- ・Rust prevention oil, coating materials such as lime, etc (when included at delivery)

(14) Packaging materials of goods delivered to Fukui Byora group (2.1 subcontracted products and 2.2 materials)
- ・Submission is unnecessary

(15) Production facilities, ancillary equipment and associated parts
- ・Submission is unnecessary

Table 1 level A substances

Level A substances are those which have been prohibited from intentional use. Substances delineated in the table below are deliberately restricted and concentrations must be below the corresponding thresholds.

Substance Group No.	Chemical Classification		Regulation Concentration Limits (Threshold)	Main Relevant Laws and Regulations
	Substance Group	Target Application		
A01	Lead and its compounds	Plastic (including rubber film), paint, pigment, ink, dye (with no volatile components) and packing material	100ppm	RoHS Directive, ChemG, EU REACH Annex ⅩⅤⅡ (Restrictions), EU Packaging Directive
		Lead free solder	500ppm	
		Metal plating	500ppm	
		Steel alloy	0.35wt%	
		Aluminum alloy	0.4wt%	
		Copper alloy and brass	4wt%	
		All applications other than above	1000ppm	
A02	Cadmium and its compounds	Plastic (including rubber film), paint, pigment, ink, dye (with no volatile components) and packing material	5ppm	RoHS Directive, ChemG, EU REACH Annex ⅩⅤⅡ (Restrictions), EU Packaging Directive
		Lead free solder	20ppm	
		Metal plating (tin plating)	20ppm	
		Metal (aside from tin) plating	75ppm	
		Zinc and its alloys (including brass, etc) usages other than the above	75ppm	
		Packing material	100ppm	
		All applications other than above	100ppm	
A03	Mercury and its compounds	Packing material	100ppm	RoHS Directive, EU Packaging Directive
		All applications other than above	100ppm	
A04	Hexavalent chromium compounds	Chromate filming treatment	0.1μg/cm2	RoHS Directive, EU Packaging Directive
		Packing material	100ppm	
		All applications other than above	100ppm	
A05	Specific organic tin compounds (TBT and TPT)	All applications	Intentional use prohibited	EU REACH Annex ⅩⅤⅡ (Restrictions), ChemG, Chem-sub Law
A06	Specific brominated flame-retardants (PBB and PBDE)	All applications	100ppm	RoHS Directive, EU REACH Annex ⅩⅤⅡ (Restrictions), Chem-sub Law

Table 1 level A substances

Level A substances are those which have been prohibited from intentional use. Substances delineated in the table below are deliberately restricted and concentrations must be below the corresponding thresholds.

Substance Group No.	Chemical Classification		Regulation Concentration Limits (Threshold)	Main Relevant Laws and Regulations
	Substance Group	Target Application		
A07	Short-chain paraffin chloride (SCCP)	All applications	Intentional use prohibited	EU REACH Annex Ⅹ Ⅶ (Restrictions)
A08	Polychlorinated biphenyl (PCB) Polychlorinated terphenyl (PCT)	All applications	Intentional use prohibited	Chem-sub Law EU REACH Annex Ⅹ Ⅶ (Restrictions), ChemG
A09	Poly-vinyl chloride (PVC), its mixtures, its copolymers	All applications	Intentional use prohibited	EU REACH Annex Ⅹ Ⅶ (Restrictions)
A10	HBCDs (Hexabromocyclododecane)	All applications	Intentional use prohibited	EU REACH Annex Ⅹ Ⅶ (Restrictions)
A11	Ozone depleting substance	All applications	Intentional use prohibited	Ozone Layer Law, Montreal Protocol, US Regulations (Tax on ODC use)
A12	HFCs、PFCs、SF6	All applications	Intentional use prohibited	Ozone Layer Law, Montreal Protocol, US Regulations(Tax on ODC use)
A13	Other halogen compounds (only specified substances)	All applications	Intentional use prohibited	Soil Contamination Prevention Counter measures Law, Water Pollution Control Law
A14	Dioxin	All applications	Intentional use prohibited	Law Concerning Special Measures against Dioxins
A15	Radioactive substances	All applications	Intentional use prohibited	Prevention of Radiation Hazards due to Radioisotope Act
A16	Beryllium oxide	All applications	Intentional use prohibited	IEC62474
A17	Cobalt chloride	Application as a desiccant indicator	Intentional use prohibited	EU REACH Annex Ⅹ Ⅶ (Restrictions)
A18	Azo dye and pigment forming specified amines	Indicating possibility of direct and prolonged contact orally or with human skin	Specific amines 30ppm	EU REACH Annex Ⅹ Ⅶ (Restrictions)
A19	Dibutyltin hydrogen borate	All applications	Intentional use prohibited	EU REACH Annex Ⅹ Ⅶ (Restrictions)
A20	Tris- (1-aziridinyl) phosphine oxide (TEPA)	All applications	Intentional use prohibited	EU REACH Annex Ⅹ Ⅶ (Restrictions)
A21	Tris (2,3-dibromopropyl) phosphate	All applications	Intentional use prohibited	EU REACH Annex Ⅹ Ⅶ (Restrictions)

Table 1 level A substances

Level A substances are those which have been prohibited from intentional use. Substances delineated in the table below are deliberately restricted and concentrations must be below the corresponding thresholds.

Substance Group No.	Chemical Classification		Regulation Concentration Limits (threshold)	Main Relevant Laws and Regulations
	Substance Group	Target Application		
A22	Formaldehyde	Carpentry products	Intentional use prohibited	ChemG, Formalin Act(Denmark), State of California: Regulations on the generation of formaldehyde by plywood
A23	Benzene	All applications	Intentional use prohibited	Industrial Safety and Health Law
A24	Specific substances provided for in the Class 1 Specified Chemical Substance Control Law	All applications	Intentional use prohibited	Chem-sub Law (Law Concerning the Examination and Regulation on Manufacture, etc of Chemical Substance)
A25	Substances provided for in the Prohibited Substances Occupational Health and Safety Law	All applications	Intentional use prohibited	Industrial Health and Safety Law
A26	Specific substances provided for in the Poisonous and Deleterious Substances Control Law	All applications	Intentional use prohibited	Poisonous and Deleterious Substances Control Law
A27	Substances classified as “P” in the GADSL classification	All applications	Intentional use prohibited	GADSL
A28	Halogen compound and halogen resin	Packing material	Intentional use prohibited	Blue angel, echo mark, Basel treaty, WEE Directive Appendix Ⅱ

※For name details on form 0001, refer to the illustrative list, form 0002.

Table 1 level A substances

Level A substances are those which have been prohibited from intentional use. Substances delineated in the table below are deliberately restricted and concentrations must be below the corresponding thresholds.

Substance Group No.	Chemical Classification		Regulation Concentration Limits (threshold)	Main Relevant Laws and Regulations
	Substance Group	Target Application		
A22	Formaldehyde	Carpentry products	Intentional use prohibited	ChemG, Formalin Act(Denmark), State of California: Regulations on the generation of formaldehyde by plywood
A23	Benzene	All applications	Intentional use prohibited	Industrial Safety and Health Law
A24	Specific substances provided for in the Class 1 Specified Chemical Substance Control Law	All applications	Intentional use prohibited	Chem-sub Law (Law Concerning the Examination and Regulation on Manufacture, etc of Chemical Substance)
A25	Substances provided for in the Prohibited Substances Occupational Health and Safety Law	All applications	Intentional use prohibited	Industrial Health and Safety Law
A26	Specific substances provided for in the Poisonous and Deleterious Substances Control Law	All applications	Intentional use prohibited	Poisonous and Deleterious Substances Control Law
A27	Substances classified as “P” in the GADSL classification	All applications	Intentional use prohibited	GADSL
A28	Halogen compound and halogen resin	Packing material	Intentional use prohibited	Blue angel, echo mark, Basel treaty, WEE Directive Appendix Ⅱ

※For name details on form 0001, refer to the illustrative list, form 0002.

Table 2 level B substances

Level B substances are those which are required to be reported. Ensure that all level B substances used in a product or process treatment are detailed appropriately.

Substance Group No.	Chemical Group Classification		CAS No.
	Classification	Detailed Name	
B01	Halogen compounds	1,2-dichloropropane	78-87-5
		1,2-dichloroethylene	540-59-0
		Hexachlorocyclohexane	58-89-9
		1,2,3-trichlororo benzene	87-61-6
		1,2,4-trichlororo benzene	120-82-1
		1,2,5-trichlororo benzene	108-70-3
		1,1-bis(4-chlorophenyl) ethane	3547-04-4
		Benzotrichloride	98-07-7
		3,3-dichlorobenzidine	91-94-1
		Chloroaniline	106-47-8
		3,3'-dichloro-4,4'-diamino diphenylmethane	101-14-4
		Polychloronaphthalene (the quantity of chlorine under 3)	—
		(Medium chain size and long chain type) paraffin chloride	—
		1-1-bromopropane	106-94-5
		2-2-bromopropane	75-26-3
		Pentabromodiphenyl Ether	32534-81-9
		DBBT	99688-47-8
		Dodekabromoterphenyl	79596-31-9
		Undecabromoterphenyl	83929-80-0
		4-bromo-p-terphenyl	1762-84-1
		2-bromo-p-terphenyl	3282-24-4
		4,4'-dibromo-p-terphenyl	17788-94-2
		3-bromo-p-terphenyl	1762-87-4
		3,5,3',5-tetrabromo-bisphenol A	79-94-7
		Brominated flame-retardants (excluding PBB and PBDE)	—
		Pentadecafluorooctanoic acid sodium salt	335-95-5
		Pentadecafluorooctanoic acid potassium salt	2395-00-8
		Pentadecafluorooctanoic acid silver(Ⅰ) salt	335-93-3
		Perfluorocaprylic acid fluoride	335-66-0
		Pentadecafluorooctanoic acid methyl ester	376-27-2
		Pentadecafluorooctanoic acid ethyl ester	3108-24-5
		Pentadecafluorooctanoic acid	335-67-1
		Pentadecafluorooctanoic acid ammonium salt	3825-26-1
B02	Glycol ether and its acetate ester	2-ethoxyethanol	110-80-5
		Acetic acid 2-methoxyethyl ester	110-49-6
		2-ethoxyethanol acetate	111-15-9
B03	Phtalate ester	DEHP	117-81-7
		DBP	84-74-2
		BBP	85-68-7
		DINP	28553-12-0
		DIDP	26761-40-0
		DNOP	117-84-0
		DNHP	84-75-3
B04	Polycyclic aromatic hydrocarbon (PAH and PCAH)	Benzo [a] pyrene	50-32-8
		Benzo [e] pyrene	192-97-2
		Benzo [a] anthracene	56-55-3
		Chrysene	218-01-9
		Benzo [b] fluoranthene	205-99-2
		Benzo [j] fluoranthene	205-82-3
		Benzo [k] fluoranthene	207-08-9

Table 2 level B substances

Level B substances are those which are required to be reported. Ensure that all level B substances used in a product or process treatment are detailed appropriately.

Substance Group No.	Chemical Group Classification		CAS No.
	Classification	Detailed Name	
B04	Polycyclic aromatic hydrocarbon (PAH, PCAH)	Dibenz [a, h] anthracene	53-70-3
		Benzo [e] fluoranthene	205-99-2
		Benzo [g, h, i] perylene	191-24-2
		Indeno [1,2,3-cd] pyrene	193-39-5
		Naphthalene	91-20-3
B05	Phosphorus and its compounds	Trimethyl phosphate	512-56-1
		TCP	1330-78-5
		TCX	25155-23-1
		CDP	26444-49-5
		Tris (2-chloroethyl) phosphate	115-96-8
		Red phosphorus	7723-14-0
		Other organic phosphorous compounds	—
B06	Aniline and its compounds	Aniline	62-53-3
		Aniline hydrochloride	142-02-1
		Aniline sulfate	542-16-5
		Anilinetrifluoroboron	660-53-7
		4.4'-methylenedianiline	101-77-9
B07	Nitrosamine and its compounds	N-nitrosodiethanolamine	1116-54-7
		N-nitrosodiethylamine	55-18-5
		N-nitrosodiisopropylamide	601-77-4
		N-nitrosodimethylamine	62-75-9
		N-nitrosodi-n-propylamine	621-64-7
		N-nitroso-N-ethylaniline	612-64-6
		N-nitroso-methyl-ethylamine	10595-95-6
		N-nitroso-N-methylaniline	614-00-6
		N-nitrosomorpholine	59-89-2
		N-nitrosopiperidine	100-75-4
		N-nitrosopyrrolidine	930-55-2
B08	Phenylenediamine and its compounds	Phenylenediamine	25265-76-3
		O-phenylenediamine	95-54-5
		O-phenylenediamine dihydrochloride	615-28-1
		M-phenylenediamine	108-45-2
		M-phenylenediamine dihydrochloride	541-69-5
		P-phenylenediamine	106-50-3
		P-phenylenediamine dihydrochloride	624-18-0
B09	Organic nitrogen compounds	Hydrazine	302-01-2
		2,4-diaminotoluene	95-80-7
		Nitrosamine	35576-91-1
		Musk xylene	81-15-2
B10	Surface active agents	Polyethylene glycol nonylphenyl ether	9016-45-9
		Polyethylene glycol mono-4-octylphenyl ether n (=:)10	9002-93-1
		Nonylphenol	25154-52-3
B11	Agricultural chemicals	Thiram	137-26-8
		Simazine	122-34-9
		Thiobencarb	28249-77-6
		Chlorpyrifos	2921-88-2
		Fenobucarb	3766-81-2
		Diazinon	333-41-5
		Schradan	152-16-9
		Parathion	56-38-2
		Methyl Demeton	8022-00-2

Table 2 level B substances

Level B substances are those which are required to be reported. Ensure that all level B substances used in a product or process treatment are detailed appropriately.

Substance Group No.	Chemical Group Classification		CAS No.
	Classification	Detailed Name	
B11	Agricultural chemicals	Phosphamidon	13171-21-6
		Methyl parathion	298-00-0
		TEPP	107-49-3
B12	Resins	POLY (BUTYLENE TEREPHTHALATE)	26062-94-2
		Bisphenol A	80-05-7
B13	Other organic solvents	1,4-dioxane	123-91-1
		Methoxsalen	298-81-7
		Methanol	67-56-1
		Carbon disulfide	75-15-0
		Dimethyl fumarate	624-49-7
B14	Others	Sodium azide	26628-22-8
		Mineral fiber (nature and synthesis)	—
		Arsenic and its compounds	—
		Beryllium and its compounds	—
		Selenium and its compounds	—
		Antimony and compounds	—

Level B substances are classified according to applications. Please note that other usages and associated substances may be possible.

Table 3 level C substances

Level C materials are controlled substances. These substan1 ces must be controlled by the suppliers, including recycling and/or proper disposal.

Substance Group No.	Chemical Group Classification	
	Classification	Name
C01	Metals and its compounds	Nickel and its compounds
		Manganese and its compounds
		Chrome and its compounds
		Cobalt and its compounds
		Zinc and its compounds
		Barium and its compounds
		Bismuth and its compounds
		Magnesium and its compounds
C02	Precious metals and its compounds	Copper and its compounds
		Gold and its compounds
		Palladium and its compounds
		Silver and its compounds

6.Q&A

No	Item	Question Contents	Reply
1	Inquiry	Where can questions be posted and answered?	Please contact the Fukui Byora Quality Assurance Department for inquiries regarding filling out questionaires, measurement and analysis methods. E-mail：hinsyo@byora.co.jp
2	Objective	Are all restricted chemical substances listed in level A?	Include substances from level B and level C in investigations and analysis.
3	Investigation (Packaging)	Should the packaging material be included?	If packaging material complies with item 2.3 of this document, it is treated as a separate material.
4	Investigation (Residue)	Should chemicals that have been injected in the manufacturing process but have subsequently been removed through washing be included in the investigation?	Because materials used in the manufacturing process are defined as “substances” they are also subject to the same investigation.
5	Content	After obtaining the MSDS from the vendor and investigating the contents, how should such contents be reported?	The MSDS cannot account for chemical substances in concentrations of less than 1wt%. In this investigation, it is necessary to disclose even a level as small as a few ppm, so there may be times when results must be received from different suppliers.
6	Content (confidentiality)	How is a report made based on information from third party suppliers when the contents are confidential?	This investigation does not require disclosure of all contents. For regulatory compliance purposes, the investigation is limited to the presence of chemical substances. Limit the reporting to chemical contents.
7	Reply	What should be done if the equivalent chemical investigation can not be completed?	The investigation results are a fundamental regulatory compliance, supported by all corporations and suppliers. If there are any difficulties in reporting, contact the Quality Assurance Department of the Fukui Byora corporation.
8	Future schedule	Are there plans to increase the number of chemical substances requiring investigation in the future?	Considerating the situation in society and the regulatory status it is likely that investigative requirements will be increased in the future.

7. Fukui Byora group itemized exemptions

7.1 Cadmium and cadmium chemical compounds

- Cadmium and its compounds in electrical contacts
- Cadmium alloys as electrical/mechanical solder joints to electrical conductors located directly on the voice coil in transducers used in high-powered loudspeakers with sound pressure levels of 100 dB (A) and more
- Cadmium and cadmium oxide in thick film pastes used on aluminium bonded beryllium oxide
- Cadmium and lead in filter glasses and glasses used for reflectance standards
- Cadmium in printing inks for the application of enamels on glasses, such as borosilicate and soda lime glasses
- Cadmium in detectors for ionizing radiation
- Radioactive cadmium isotope source for portable X-ray fluorescence spectrometers
- Cadmium in ion selective electrodes including glass of pH electrodes
- Cadmium in helium-cadmium lasers
- Cadmium in atomic absorption spectroscopy lamps
- Cadmium in metallic bonds to superconducting materials in MRI and SQUID detectors
- Cadmium in X-ray measurement filters
- Cadmium in infra-red light detectors

7.2 Lead and lead chemical compounds

- Lead in glass of cathode ray tubes
- Lead in glass of fluorescent tubes not exceeding 0.2% by weight
- Lead in high melting temperature type solders
- Lead in solders for servers, storage and storage array systems, network infrastructure equipment for switching, signaling, transmission, and network management for tele-communications
- Electrical and electronic components containing lead in a glass or ceramic other than dielectric ceramic in capacitors, e.g. piezoelectronic devices, or in a glass or ceramic matrix compound
- Lead in dielectric ceramic in capacitors for rated voltage of 125V AC or 250V DC or higher
- Lead in PZT based dielectric ceramic materials for capacitors being part of integrated circuits or discrete semiconductors
- Lead in bearing shells and bushes for refrigerant-containing compressors for heating, ventilation, air conditioning and refrigeration (HVACR) applications
- Lead in solders to complete a viable electrical connection between semiconductor die and carrier within integrated circuit flip chip packages
- Lead in linear incandescent lamps with silicate coated tubes
- Lead halide as radiant agent in high intensity discharge (HID) lamps used for professional reprography applications
- Lead and cadmium in printing inks for the application of enamels on glasses, such as borosilicate and soda lime glasses
- Lead in solders for the soldering to machined through hole discoidal and planar array ceramic multilayer capacitors
- Lead oxide in surface conduction electron emitter displays (SED) used in structural elements, notably in the seal frit and frit ring
- Lead bound in crystal glass as defined in Annex 1 (Categories 1,2,3 and 4) of Council Direxitive 69/493/EEC
- Lead in soldering materials in mercury free flat fluorescent lamps (which, e.g. are used for liquid crystal displays, design or industrial lighting)
- Lead oxide in seal frit used for making window assemblies for Argon and Krypton laser tubes
- Lead in solders for the soldering of thin copper wires of 100μm diameter and less in power transformers
- Lead in cermet-based trimmer potentiometer elements
- Lead in the plating layer of high voltage diodes on the basis of zinc borate glass body
- Lead in detectors for ionizing radiation
- Lead bearings in X-ray tubes
- Lead in electromagnetic radiation amplification devices: micro-channel plate and capillary plate
- Lead in glass frit of X-ray tubes and image intensifiers and lead in glass frit binder for assembly of gas lasers and for vacuum tubes that convert electromagnetic radiation into electrons
- Lead in shielding for ionizing radiation
- Lead in X-ray diffraction crystals
- Radioactive cadmium isotope source for portable X-ray fluorescence spectrometers
- Lead in ion selective electrodes including glass of pH electrodes
- Lead anodes in electrochemical oxygen sensors
- Lead in infra-red light detectors
- Lead in atomic absorption spectroscopy lamps
- Lead in alloys as a superconductor and thermal conductor in MRI
- Lead in metallic bonds to superconducting materials in MRI and SQUID detectors
- Lead in counterweights
- Lead in single crystal piezoelectric materials for ultrasonic transducers
- Lead in solders for bonding to ultrasonic transducers
- Lead in solders in portable emergency defibrillators
- Lead in solders of high performance infrared imaging modules to detect in the range 8-14 μm
- Lead in Liquid crystal on silicon (LCoS) displays

Alloy Type	Permissible Lead Content Levels
Steel	Below 0.35wt%
Aluminum alloy	Below 0.4wt%
Copper alloy (including brass and phosphorus bronze)	Below 4wt%

7.3 6 value chromium and its chemical compound

- Hexavalent chromium as an anticorrosion agent of the carbon steel cooling system in absorption refrigerators up to 0.75% by weight in the cooling solution

7.4 Mercury and its chemical compound

- Mercury in single capped (compact) fluorescent lamps not exceeding (per burner)
  For general lighting purposes < 30 W : 3.5 mg/burner
  For general lighting purposes ≥ 30 W and < 50 W : 3.5 mg/burner
  For general lighting purposes ≥ 50 W and < 150 W : 5 mg/burner
  For general lighting purposes ≥ 150 W : 15 mg/burner
  For general lighting purposes with circular or square structural shape and tube diameter ≤ 17 mm : 7 mg/burner
  For special purposes : 5 mg/burner
- Mercury in double-capped linear fluorescent lamps for general lighting purposes not exceeding (per lamp)
  Tri-band phosphor with normal lifetime and a tube diameter < 9 mm : 4 mg/lamp
  Tri-band phosphor with normal lifetime and a tube diameter ≥ 9 mm and ≤17 mm : 3 mg/lamp
  Tri-band phosphor with normal lifetime and a tube diameter > 17 mm and ≤ 28 mm : 3.5 mg/lamp
  Tri-band phosphor with normal lifetime and a tube diameter > 28 mm : 3.5 mg/lamp
  Tri-band phosphor with long lifetime (≥ 25000 h) : 5 mg/lamp
- Mercury in other fluorescent lamps not exceeding (per lamp)
  Non-liner tri-band phosphor lamps with tube diameter > 17 mm : 15 mg/lamp
  Lamps for other general lighting and special purposes : 15 mg/lamp
- Mercury in cold cathode fluorescent lamps and external electrode fluorescent lamps (CCFL and EEFL) for special purposes not exceeding (per lamp)
  Short length (≤ 500 mm) : 3.5mg/lamp
  Medium Length (> 500 mm and ≤ 1500 mm) : 5 mg/lamp
  Long length (> 1500 mm) : 13 mg/lamp
- Mercury in other low pressure discharge lamps (per lamp): 15 mg/lamp
- Mercury in High Pressure Sodium (vapour) lamps for general lighting purposes not exceeding (per burner) in lamps with improved colour rendering index Ra > 60
  P (lamp electricity) ≤ 155 W : 30 mg/burner
  155 W < P ≤ 405 W : 40 mg/burner
  P > 405 W : 40 mg/burner
- Mercury in other High Pressure Sodium (vapour) lamps for general lighting purposes not exceeding (per burner)
  P (lamp electricity) ≤ 155 W : 25 mg/burner
  155 W < P ≤ 405 W : 30 mg/burner
  P > 405 W : 40 mg/burner
- Mercury in metal halide lamps (MH)
- Mercury in other discharge lamps for special purposes not specifically mentioned in this guideline
- Mercury in detectors for ionising radiation
- Mercury in infra-red light detectors
- Mercury in reference electrodes: low chloride mercury , mercury sulphate and mercury oxide
- Mercury in very high accuracy capacitance and loss measurement bridges and in high frequency RF switches and relays in monitoring and control instruments not exceeding 20 mg of mercury per

7.5 Azo dye made from specific amines, pigment

- Items with no potential for direct and prolonged contact with human skin or oral ingestion

7.6 Formaldehyde

- Fiber board, wood products other than particle board and plywood

7.7 Polyvinyl chloride (PVC) and binder for PVC blend resin

- Binder resin
- High pressure vinyl electric wire
- Insulating tape
- Speaker grille
- Power cord
- Lead transformer (varnish-filled)
- Call cord
- Fine electric wire above AWG36
- Cable unavailable as commercial commodities (Cable broadcast cameras with associated cables and microphones, etc)

Form-0001

Fukui Byora Corporation Date 200X, 00, 00

Environmentally Hazardous Banned Substance Compliance

Company name:

Address: Company Seal

Title/Position:

Contact name:

Signature

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Our corporation (including our subsidiaries and affiliates), directly and/or through any third party as applicable, do hereby certify that the following products subject to delivery (including any packaging material used in delivery) to the Fukui Byora Group follow the guidelines put forward in the “Supplier Sustainability Declaration” (EMS-0001-04) and that chemical substances deemed to be of Level A are not contained therein (including at a value below that required by regulation) nor intentionally used in the manufacturing thereof.

Description

Target items

	Item Name	Item Number
1		
2		
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15		

※If item number exceeds this amount, please attach a separate sheet.

Remarks

End