



Green Procurement Guidelines

(Rev.5)

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1.Introduction

Since our founding, the KBG Group has operated as a technical trading company specializing in 'Protective' products primarily rubber, based on the belief that 'there is no future for us without addressing environmental issues.'

In recent years, achieving a sustainable society has become an important mission for companies. We believe that companies contributing to environmental conservation by incorporating environmental considerations into their business activities and providing environmentally friendly products will significantly contribute to addressing future environmental issues.

Furthermore, environmental laws and regulations enacted in countries around the world are becoming stricter day by day, and companies that fail to comply with these laws may be held accountable to society, potentially facing significant business risks.

Against this background, environmentally conscious procurement are becoming increasingly important for companies and are an issue that must be addressed throughout the entire supply chain.

Therefore, in order to ask for the understanding and cooperation of our business partners, we are issuing the "Green Procurement Guidelines (Fifth Edition)" to comply with environmental laws and regulations, and contribute to an environmentally friendly and sustainable society.

We express our gratitude for your cooperation in our business activities to date, and we would appreciate your continued understanding and support.

2.Environmental Policy and Green Procurement

【Environmental Policy】

To contribute to a sustainable living environment, our group aims for harmony with the global environment in all of our business activities.

1. We will establish an environmental management system based on ISO 14001 and work to implement and continuously improve it in our business activities.
2. We will actively propose and provide products with low environmental impact and safety, as well as services that contribute to reducing environmental impacts.
3. We will comply with environmental laws and regulations related to our business activities, as well as requirements from our customers to which we agree, and provide necessary information.
4. The environmental policy will be made public as needed.

【Initiatives for Green Procurement】

Based on our policy of prioritizing the procurement of materials and components that minimize environmental impact from suppliers with excellent environmental initiatives, we will work with our suppliers to promote environmental conservation efforts.

3. Basic Concept of Green Procurement

When conducting business with our business partners, we will prioritize those who actively address our requirements.

In particular, our requirements must be complied with for the designated chemical substances listed in the table below.

【designated chemical substances】

Management Rank	Substances
Prohibited Substances (31 groups)	Cadmium, Hexavalent Chromium, Lead, Mercury, PBBs, PBDEs, DEHP, BBP, DBP, DIBP, PCBs, PCTs, Polychlorinated Naphthalenes, SCCP (C10-C13), MCCP (C14-C17), Asbestos, Certain Organotin Compounds, PFOS, UV-328, DMF, HBCD, PAHs, PIP (3:1), PCTP, HCBd, PFOAs, PFCAs (C9-C21), PFHxS, MOAH, MOSH, Dechlorane Plus
Reduction	Ozone-Depleting Substances (Class 1)
Controlled Substances	IEC62474 Declarable Substance List REACH SVHC List

*For details, please refer to the "Appendix: List of Designated Chemical Substances".



Please note that due to our customers' specific regulations or industry trends, the management details (substance group, management rank, threshold, etc.) may differ. In such cases, we may ask you to confirm these special requirements and take appropriate action.

Futhermore, we may request your cooperation in investigating designated chemical substances used in the manufacturing process, storage, transportation, and other stages. We would also appreciate your cooperation.

4.Requirements for Green Procurement

4-1) Environmental Management Requirements for Business Partners

(1) Environmental Management System

To establish an environmental management system for the proper management and operation of green procurement and related designated chemical substances.

We also request that you provide information regarding the presence of designated chemical substances from our secondary and tertiary suppliers (promoting the dissemination of environmental information).

(2) Legal compliance

To comply with all applicable environmental protection laws and regulations.

(3) Promotion of environmental improvement activities

To voluntarily promote environmental improvement activities such as energy conservation, reduction of waste and CO2 emissions, and improvement of transportation efficiency.

(4) Providing information

Provide necessary environmental information if requested by our company.

However, if the information may be confidential, notify us in advance.

4-2) Product Requirements

(1) Restrictions on Designated Chemical Substances

The materials and parts supplied to our company are prohibited from containing any of the "prohibited" substances listed in the "List of Designated Chemical Substances".

(2) Reporting of Designated Chemical Substances

For materials and parts delivered to our company, must report information on the content of "controlled" substances designated in the "List of Designated Chemical Substances" (including the chemical substance content, location of content, mass of the products, purpose of content, and hazardous nature).

(3) Cooperation in the designated chemical substance survey

If requested by our company or our customers for a designated chemical substance survey, please provide information regarding the content, location of the chemical substance, mass of the products, purpose of inclusion, and hazardous properties of the designated chemical substance.

【Revision History】

Edition	Date	Main Revisions
1st Edition	January 2021	Issued
2nd Edition	February 2022	Updated designated chemical list
3rd Edition	February 2024	Updated list and appendix
4th Edition	March 2025	Updated environmental policy and chemical list
5th Edition	February 2026	Updated procurement requirements and chemical list

【Appendix: List of Designated Chemical Substances】

Management Rank	No.	Specified Chemical Substances	Related Regulations	CAS No. (representative)	Threshold
Prohibited	1	Cadmium and its compounds	EU RoHS II	7440-43-9	0.01wt% in homogeneous materials
	2	Chromium (VI) Compounds	EU RoHS II	10588-01-9	0.01wt% in homogeneous materials
	3	Lead and its compounds	EU RoHS II	7439-92-1	0.01wt% in homogeneous materials
	4	Mercury and its compounds	EU RoHS II	7439-97-6	Intentionally added or 0.01wt% in homogeneous materials
	5	Polybrominated biphenyls (PBB)	EU RoHS II EU POPs Regulation	—	0.01wt% in homogeneous materials
	6	Polybrominated diphenyls ether (PBDE)	EU RoHS II Japanese law (Class1 Specified Chemical Substances) USA TSCA PCB regulation	—	0.01wt% in homogeneous materials
	7	Bis(2-ethylhexyl) phthalate (DEHP)	EU RoHS II	117-81-7	0.01wt% in homogeneous materials
	8	Benzyl butyl phthalate (BBP)	EU RoHS II	85-68-7	0.01wt% in homogeneous materials
	9	Dibutyl phthalate (DBP)	EU RoHS II	84-74-2	0.01wt% in homogeneous materials
	10	Diisobutyl phthalate (DIBP)	EU RoHS II	84-69-5	0.01wt% in homogeneous materials
	11	Polychlorinated biphenyls and specific substitutes (PCBs)	Japanese law (Class1 Specified Chemical Substances) EU POPs Regulation	1336-36-3	Intentionally added
	12	Polychlorinated Terphenyls (PCTs)	EU REACH Regulation Annex XVII	61788-33-8	0.005wt% in material
	13	Polychlorinated naphthalenes (with more than 1 chlorine atoms)	Japanese law (Class1 Specified Chemical Substances)	70776-03-3	Intentionally added
	14	Alkanes, C10-13, chloro (Short-chained chlorinated paraffins)	EU POPs Regulation Japanese law (Class1 Specified Chemical Substances)	85535-84-8	Intentionally added or 0.01wt% in homogeneous materials
	15	Chlorinated paraffins with carbon chain lengths in the range C14-17 and chlorination levels at or exceeding 45 per cent chlorine by weight (MCCP)	EU POPs Regulation	85535-85-9	Intentionally added
	16	Asbestos	EU REACH Regulation Annex XVII Industrial Safety and Health Act (Prohibition of Manufacturing)	77536-66-4	Intentionally added
	17	Specific organotin compounds Tributyltin compounds (TBTs) Triphenyltin Compounds (TPTs) Bis(tributyl tin)=oxide (TBTOS) Dibutyltin compounds (DBTs) Dioctyltin compounds (DOTs)	EU REACH Regulation Annex XVII	—	Intentionally added or 0.1wt% of tin in the part
	18	Perfluorooctanesulfonic acids (PFOS) and its salts and PFOS-related substances	EU REACH Regulation Annex XVII EU POPs Regulation Japanese law (Class1 Specified Chemical Substances)	1763-23-1	Intentionally added or 0.025ppm (as PFOS including its salts) or 1ppm (as PFOS-related substances) of the part
	19	2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328)	EU POPs Regulation Japanese law (Class1 Specified Chemical Substances)	25973-55-1	Intentionally added or 100ppm
	20	Dimethylfumarate (DMF)	EU REACH Regulation Annex XVII	624-49-7	0.00001wt% of the part
	21	Hexabromocyclododecane (HBCD/HBCDD)	EU POPs Regulation Japanese law (Class1 Specified Chemical Substances)	25637-99-4	Intentionally added or 0.0075wt%
	22	Polycyclic aromatic hydrocarbons (PAHs)	EU REACH Regulation Annex XVII	50-32-8	0.0001 mass% of the plastic or rubber part

Management Rank	No.	Specified Chemical Substances	Related Regulations	CAS No. (representative)	Threshold
Prohibited	23	Phenol, Isopropylated Phosphate(3:1) (PIP(3:1))	USA TSCA PCB regulation	68937-41-7	Intentionally added
	24	Pentachlorothiophenol (PCTP)	USA TSCA PCB regulation	133-49-3	1wt% in homogeneous materials
	25	Hexachlorobutadiene (HCBD)	USA TSCA PCB regulation	87-68-3	Intentionally added
	26	Perfluorooctanoic acid (PFOA) and its salts and PFOA-related substances	EU POPs Regulation Japanese law (Class1 Specified Chemical Substances)	335-67-1	Intentionally added or 0.025ppm of PFOA including its salts in article or mixture, PFOA-related substances or 1 ppm of one or a combination of PFOA-related substances, in article or mixture
	27	C9-C14 perfluorocarboxylic acids (C9-C14 PFCA) and their salts and C9-C14 PFCA-related substances	EU REACH Regulation Annex XVII	375-95-1 335-76-2 2058-94-8 307-55-1 72629-94-8 376-06-7	25 ppb for the sum of C9-C14 PFCA and their salts or 260 ppb for the sum of C9-C14 PFCA-related substances
	28	C15-C21 perfluorocarboxylic acids (C15-C21 PFCA) and their salts and C15-C21 PFCA-related substances	EU POPs Regulation	141074-63-7 67905-19-5 57475-95-3 16517-11-6 133921-38-7 68310-12-3	Intentionally added
	29	Perfluorohexanesulfonic acid (PFHxS) and its salts and PFHxS-related substances	Japanese law (Class1 Specified Chemical Substances) EU REACH Regulation Annex XVII EU POPs Regulation	355-46-4	Intentionally added or 25 ppb by mass of PFHxS or any of its salts Intentionally added or a mass content of the sum of PFHxS precursor compounds of 1000 ppb
	30	mineral oil aromatic hydrocarbons (MOAH) consisting of 1-7 aromatic cycles	—	—	1000 ppm in packaging materials and inks in printed materials
	31	mineral oil aromatic hydrocarbons (MOAH) consisting of 3-7 aromatic cycles	—	—	1 ppm in packaging materials and inks in printed materials
	32	mineral oil saturated hydrocarbons (MOSH) consisting of 16-35 carbon atoms	—	—	1000 ppm in packaging materials and inks in printed materials
Controlled	33	1,6,7,8,9,14,15,16,17,17,18,18-Dodecachloropentacyclo [12.2.1.16,9.02,13.05,10]octadec a-7,15-diene ("Dechlorane Plus")	EU POPs Regulation	13560-89-9	Intentionally added or 1000ppm
	34	EU REACH Regulation SVHC group (Prohibited substances specified in these guidelines are excluded.)	—	—	0.1wt% of each article
	35	Applicable substances listed in IEC62474 (Prohibited substances specified in these guidelines are excluded.)	—	—	—