

Green Procurement Guideline

(Revision 4)

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Orbray Co., Ltd.
Orbray (Thailand) Co., Ltd.

Introduction

The 21st century is called the age of the environment, and the aggressive efforts of the global environment preservation activities are required to all the companies increasingly.

Orbray Co., Ltd. (hereinafter; Orbray or our company) are promoting the environmental activities in whole the company under the environmental policy.

This guideline has been established to provide our products and services to be considered the environment aspect, and also, to promote the Green Procurement for using parts and materials.

This guideline is the basic idea of Orbray about “Green Procurement” and indicates the basic ideas how Orbray and our suppliers take actions together on environmental improvement from now on continuously.

In accordance with social circumstances and/or regulation change, this guideline may be revised accordingly. For our suppliers, please be understood our environmental activity and thank you very much for your cooperation.

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Contents

1. Purpose	4
2. Scope	4
3. Terms and definitions	4
4. Orbray environment preservation activities.....	5
4.1 Vision on environment and quality	5
4.2 Environmental activities	5
5. Orbray green procurement	6
5.1 The concept of green procurement	6
5.2 Green procurement criteria	6
6. Requests to our suppliers	7
7. Regulating environmental impact substances.....	8
8. Revision history	10

1. Purpose

For the effective effort of deduction the environmental impact substances based on the environmental policy (the environmental activity) of Orbray, this procurement guideline has been prepared and promoted for procurement of parts and materials with fewer environmental impact substances, and also for procurement from suppliers with aggressive efforts in environmental preservation activities (hereinafter; Guideline)

2. Scope

This guideline is applied for such products as parts and materials including designing and outsourcings, and also subsidiary materials and packaging materials.

3. Terms and definitions

Terms and definitions of this guideline are as follows:

(1) Product assessment

Throughout its design process, the assessment of the environmental impact of a product must be implemented on such as parts and materials, procurement, production, distribution, use, recycle and disposal steps.

When the design change is necessary, it must be assessed and implemented to reduce the environmental impact.

(2) The parts and materials constituting the product, etc.

All elements that constitute products manufactured by Orbray. This includes parts and materials such as electronic components, machined parts, resin parts, pressed parts, bonding materials, solder, glass, fiber cores, and wires, as well as sub-materials, service parts, and packaging materials.

(3) Contain

This is the situation when a substance is intentionally or unintentionally added, immixed or adhered to parts and materials constituting the products. Impurity is also a category of this.

(4) Impurities

This is the situation when a substance is being contained in a natural materials and cannot be removed at all technically by the refinement process as to be industrial material and being occurred during the process of the synthetic reaction and cannot be removed at all technically.

(5) Intentionally added (use)

It is added intentionally (used) in the event that continual containing is desired to bring specified characteristics, appearance, quality.

(6) Homogeneous material

One material that is entirely of uniform composition or a material composed of several materials that cannot be disassembled or separated into different materials by mechanical action (unscrewing, cutting, crushing, grinding, etc.).

(7) RoHS Directive

1) RoHS (2002/95/EC)

Chemical substance control regulation of EU (Enforcement: 1st July, 2006). The regulation established which should not contain and no use any hazardous substances to the products. 6 substances are designated.

2) RoHS II (2011/65/EU) (EU/2015/863)

Directive EU/2015/863 being replaced Annex II of 2011/65/EU comes to public by the gazette; 4 substances of phthalic acid are added, and they become to totally 10 prohibited substances. (Date: 4/JUN/2015)

(8) REACH Regulation

Chemical substance regulation of the EU (1st June, 2007 in force).

Comprehensive management system of chemical substance to register, assess, permit, restrict and control the chemical substance used in a molded, a mixture, and a single part appropriately. Information on harmful chemicals are disclosed, communicated and shared in the supply chain.

(9) Substances of Very High Concern (SVHC)

Those substances which make very high anxiety against person's health and environment such as carcinogenic, toxic substance, persistent, etc.

(10) PBT Substances

PBT (Persistent, Bioaccumulative, Toxic) substances are persistent, highly accumulative, and toxic substances.

(11) Exemption

Substances which are excluded by laws and regulations because there is no substitution (substance, material, technical matter) and no other use and component at this moment

(12) Sub-materials

Sub-materials are tools, jigs, abrasives, cleaning agents, and other similar materials used in the manufacturing, processing, inspection, cleaning, storage, or shipment of products, excluding raw materials, parts, and packaging materials that constitute the product itself.

Among sub-materials, those that may remain on, adhere to, or be transferred to the product shall be evaluated as subject to Product Chemical Substance Management.

However, even if a sub-material contains regulated substances or environmental impact substances, it may be excluded from Product Chemical Substance Management, provided that it has been confirmed that such substances do not remain on, adhere to, or transfer to the final product after cleaning, removal, firing, drying, or other equivalent processes.

4. Orbray environment preservation activities

4.1 Vision on environment and quality

Our company intends to further develop global businesses that are in harmony with the global environment and that will enable us to pass the bountiful Earth on to coming generations. We also endeavor to offer products of the highest quality to serve the needs of our society, and to raise customer satisfaction to 100%. Ensuring that the high quality of our products is compatible with environmental protection is of utmost importance to future of our business and our planet.

4.2 Environmental activities

We grasp accurately that the above activities, products, and services have an environmental influence, establish the environmental objectives and targets within technological and economical possible scope, review periodically and plan for continuous improvement of the environmental preservation activities and to make an effort to prevent pollution.

On proceeding the environmental activity, we have consolidated in 2018 as Adamant Namiki Precision Jewel Co., Ltd. and have established and announced the environmental policy officially.

In 2023, we integrated Akita Adamant Co., Ltd. and established and announced our environmental policy as Orbray Co., Ltd.

5. Orbray green procurement

5.1 The concept of green procurement

Planning for the environmental impact reduction in products, Orbray works on the activity by partnership with the clients aiming at symbiosis with nature.

- (1) Procurement from the suppliers promoting environment preservation activities
Regarding the green procurement, we give priority to the suppliers which promote more the environment preservation activity and which have acquisition of the ISO 14001 certification of external certification bodies, etc. when we purchase.
- (2) Procurement of the less environmental impact products, sub-materials and packaging materials
We effort to select the less environmental impact goods when we purchase the products, and ant other production relating sub-materials and packaging materials.

5.2 Green procurement criteria

Regarding the green procurement, we follow the selection criteria for the suppliers and judge comprehensively in general considering both the supplier environment preservation activity and effect to the environmental impact of purchased products.

For your reference, the further judgement way may be differed among individual site of Orbray, please contact with the purchasing section of the site appropriately and cooperate us.

(1) Supplier selection criteria

Regarding the supplier selection, we evaluate quality (Q), cost (C), delivery (D), service (S) and evaluation of the supplier's aggressive effort for environmental preservation activity, and we precede the upper rank suppliers.

Operation procedures of this evaluation criteria are as follows:

- Please complete the Green Procurement Supplier Survey Form (Appendix-1) by conducting a self-assessment and enter your evaluation scores.
- Please submit the Green Procurement Supplier Survey Form to the purchaser in charge.
- Orbray's evaluated points will be added and evaluated comprehensively as "A", "B", "C" and "D".
- The comprehensive result will be informed you by the purchaser in charge.
- In the case that the comprehensive result becomes "A", "B" and "C", the

- transaction goes from the priority order of “A”, “B” and “C”.
- In the case that the comprehensive result becomes “D”, its new order comes to stop until any corrective actions would make efforts. In a case, the transaction comes to the end.
- At the cases, the Green Procurement Supplier Survey Form is needed when the name changed or when the supplier is a new comer.

(2) Selection criteria on the procured products

When selecting the buying products, we adopt them not only consideration of quality (Q) and cost (C), but also how excellent for the environmental impact reduction.

- There is no substance specified in the environmental impact substance list (Chemical substances management guidelines) or going reduced those substances.
- Being planned to use recycle parts or resources, made an effort to reduce weight and size, and took into consideration product durability improvement than before.
- Taking into consideration of resource saving and energy saving.
- Being considered ease of disassembly, sorting and collecting in design.
- Same as the products, the packaging materials are also considered resource saving, recycling, reducing weight and no or reducing the environmental impact substance.
- Compliance with those chemical laws and regulations in inside and outside Of the country.
- Implementation the products assessment
- Providing or being able to provide environmental information to public related to products.

The total is accumulated a) The item of requisition the environmental ISO, etc. by the outer body (third party) , b) The item of environment preservation activity and c) The item of reduction of environmental impact and adding Orbray’s evaluation result with the above accumulated total as follows:

《 Score 》	《 Evaluation results 》
ISO qualified or more than 101	A
80 ~ 100	B
50 ~ 79	C
Not more than 49	D

6. Requests to our suppliers

Suppliers are required the following submission considering above.

- (1) Survey on the presence and activities of third-party certification
 - ISO 14001 qualification
 - Eco-Action 21
 - Green procurement activities

- (2) Content survey of environmental impact substances contained in the delivered products:

To identify environmental impact substances contained in products delivered to Orbray, we will conduct surveys through the submission of

the Certificate of Non-Use of Prohibited Substances (Appendix-3), and to determine the content levels, through the submission of Safety Data Sheets (SDS), ingredient tables, chemical analysis data, content survey forms, and other relevant documents. Additionally, when deemed necessary, we will conduct similar surveys regarding the usage status of environmental impact substances throughout all manufacturing processes of the delivered products.

(3) Conclusion of a memorandum of understanding on environmental impact reduction

Also, in case to ensure reduction of the environmental impact in the products delivered to Orbray, the suppliers are required to sign a memorandum to accept cooperation for surveys (Appendix-2).

7. Regulating environmental impact substances

For the purpose of reduction and control, Orbray has categorized chemical substances into 2 types: “prohibited substance” and “controlled substances” since RoHS Directive issued considering any environmental risk.

Then, Orbray requires the suppliers to prohibit, reduce and control contained substances in the products being delivered to us. Regarding the environmental impact substances, please refer our “Chemical Substances Management Guideline”.

<http://www.orbray.com/>

Details of the environmental impact substance which Orbray specified are decided in conformity to RoHS Directive, REACH regulation, JAMP (Joint Article Management Promotion-consortium) and the customer’s environmental impact substance criteria.

For the detail information of the environmental impact substances in this guideline, please refer to following home pages, and for the detail information about RoHS Directive, REACH regulation, etc. are able to confirm “SME support portal site J-Net21”

- “JAMP : Joint Article Management Promotion-consortium”
<https://chemsherpa.net/>
- “SME (Small and Medium Enterprise) support site J-Net21”
<https://j-net21.smrj.go.jp/development/chemical/index.html>

(1) “Prohibited substances”

The chemical substances which are regulated by the overseas “RoHS Directive And REACH regulation, etc.” and the domestic typical laws, which are severely influenced against human health or ecosystem “SVHC or Substances of Very High Concern”, and which are prohibited to use by Orbray.

Regarding these substances, they are required to no intentional use in the product, the sub-materials, the packaging materials, etc. of which Orbray purchases. Also, it is needed that the impurity content value is less than Orbray’s regulated value.

(Submission of chemical analysis data and contents information such as SDS are needed.)

In case that it exceeded the limited value or is considered any possibility of intentional use, please clarify and disclose the reasons of intentional use or the contents percentage.

(2) “Controlled substances”

The one should be reduced as much as possible from the material, the parts, etc. which constitute Orbray products, and the one should be grabbed and controlled appropriately those contents percentage, areas and intentional use reasons (i.e. it is needed for characteristic stability and there is no substitution technically at present.)

(3) How to handle the recycling resin mold materials

Prohibition of use of the recycling resin mold materials

Reuse of exhausted products and waste materials is prohibited as the parts and materials for our products, and use of the parts and materials of the other products as recycling material as well.

However, if the value of them were LCL (Lower Control Level) definition of “Chemical Substances Management Guidelines”, it is acceptable.

In this case, please submit the analysis data of resin mold materials to be recycled. (For the details, please contact our purchasing section in charge.)

(4) Measures for Phthalate Ester Migration

Specified phthalate esters are known to exhibit migration properties (the property by which substances are transferred to other molded articles through contact), and therefore unintentional contamination is likely to occur.

Accordingly, depending on the manufacturing, storage, and handling conditions, appropriate control measures may be required to prevent phthalate ester migration.

Please refer to the Chemical Substances Management Guidelines and ensure that products, as well as the parts, materials, and sub-materials constituting the products, are confirmed to be free from the specified phthalate esters.

8. Revision history

Rev. No	Description	Establishment	Enforcement
0	First edition established by company name changed. Description of conflict minerals added.	22 / JAN / 2018	01 / FEB / 2018
1	RoHS II (2011/65/EU) (EU2015/863) 10 substances added. NPT apply this book also.	01 / APR / 2019	01 / MAY / 2019
1.2	Change of company name and logo/addition of controlled substances Revision of forms and other documents according to the above	06 / JAN / 2023	06 / JAN / 2023
2	3. Definition of terms (6) Homogeneous material was added. Deleted major customers. Updated Web-site address to access the information of the relevant organization. Updated the list of environmentally hazardous substances in Appendix 1. Updated environmental load substances in Table-3 "Certificate of Non-Use of Prohibited Substances".	27 / OCT / 2023	27 / OCT / 2023
3	· Revision accompanying the establishment of new procurement guidelines. The description regarding "conflict minerals" initiatives has been transferred to "3.3. Responsible Mineral Procurement" in the newly established higher-level procurement guidelines document, and Section 8 of this document has been deleted. · Minor revision of the expression for "materials and components constituting products" in Section 3, Terms and Definitions (2). · Deletion of Annex 1 Environmental Impact Substances List. · Separation of appendices from the main text. Addition of appendix numbers to the appendices. · Addition of description regarding the Certificate of Non-Use of Prohibited Substances to Section 6 (2).	15 / JUL / 2025	15 / JUL / 2025
4	· Added Section 3, Terms and definitions, Item (12) "Sub-materials." · Added Section 7, Regulating Environmental Impact Substances, Item (4) "Measures for Phthalate Ester Migration."	14 / JUL / 2026	14 / JUL / 2026