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(To Suppliers)

Green Procurement Guideline

TOPCON CORPORATION

Manufacturing Div.
Integrated Procurement Dept.

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♦Introduction

Under current business situation such that it is always required to demonstrate its all-round ability, it redefined and clarified its common values transcending nationalities and individual companies in order to exert its strengths such as global scale and diversity, and to build a self-supporting organizational culture.

Every employee conducts TOPCON WAY, and Topcon group will step in brand-new direction for centennial through which it does not only conduct its strategies to strengthen the profitability by foreseeing changes of business environment, but also enhance its capability with the mindset of TOPCON WAY.

Green procurement involves procuring products, parts and materials, etc. with minimal environmental impacts from suppliers that vigorously promote environmental protection.

To reduce environmental impacts and risks of hazardous chemical substances, the entire supply chain is required to thoroughly participate in such activities. As the cooperation with our suppliers is a key factor, we established the "Green procurement guidelines".

We would appreciate it if our valued suppliers understand the concept of green procurement to be implemented in accordance with the guidelines described in this document and cooperate with us accordingly.

Topcon Corporation
General Administration & Legal Div.
Product Development Div.
Manufacturing Div.



-Corporate Identity-

Topcon contributes to enrich human life by solving the societal challenges within healthcare, agriculture and infrastructure.

-Management Policy-

Topcon focuses on leading-edge technology to provide new value through innovation and manufacturing.

Topcon respects diversity and acts as a global company.

Topcon places the utmost priority on compliance and continues to be a trustworthy partner to all stakeholders.

Topcon for Juman Life

♦ Basic procurement policy of Topcon

• Equal and fair procurement activities

We engage in transparent, equal, and fair procurement activities in new transactions with all clients.

We make decisions on the selection of clients based on comprehensive and objective evaluations and procedures covering aspects such as certainty in quality, price, deadline, stability in technical standards and administration, and a environmental consideration.

Coexistence and co-prosperity

We constantly maintain and encourage trust-based relationships and aim to achieve coexistence and co-prosperity with our clients through business transactions.

• Rules on the compliance with laws

We engage in business transactions while complying with laws, social norms, and healthy commercial practices.

Management and protection of information

We never disclose confidential information of our procurement activities with clients to the outside of our company.

• Green procurement

We procure items from partners that are implementing conservation activities. We also purchase/use products, parts, materials, and raw materials which produce low environmental load in their lifecycles.

◆ Topcon Green Procurement

1. Objective

As part of the environmental protection activity process, recognizing our responsibility to maintain the health of the global environment as an irreplaceable asset for future generations, we at Topcon Corporation are engaging in environmental activities in close cooperation with our suppliers.

As one of our efforts, we are promoting the supply of products and services with 1 minimal environmental impacts. For this purpose, the concept of green procurement is essential.

We aim at procuring the parts, materials, units, products, secondary materials, etc. (hereinafter collectively called "delivered items") with low environmental loads by promoting the business activities, being aware of the environmental loads and risks.

2. Request to suppliers

We request our suppliers to "promote the environment protection activities", "build the system for controlling the chemical substances contained in the products" and "conduct the survey on the use of chemical substances contained in the products".

Our suppliers are respectfully advised to understand our requests and the purpose of such survey, and cooperate with us accordingly.

2-1 Promotion of environmental protection

We take priority in procuring items from our suppliers who are promoting environmental protection. Such efforts encompass the following activities.

- Establishment of environmental policies
- Improvement of the environmental preservation system
- · Construction of the system for education and achievement control

By implementing such environmental protection activities, our suppliers are requested to promote the energy-saving activities, the concept of 3Rs (Reduce, Reuse and Recycle) and the control of chemical substances contained in the products.

2-2 Establishment of the system for the control of chemical substances contained in the products

1) Developing the control system

Our partners as well as their suppliers are requested to build the system for controlling and reducing the chemical items contained in the products, which form part of the delivered items, and operate such system appropriately.

For the details of the control of chemical substances contained in the products, refer to the "Guidelines for the control of chemical substances contained in the products" offered by JAMP (*1).

(*1) The Joint Article Management Promotion-consortium (hereinafter called "JAMP") is an NPO involved in the promotion of the establishment of systems for ensuring the information on the chemical substances contained in the products is smoothly disclosed and communicated through the entire supply chains.

2) Checking the control system

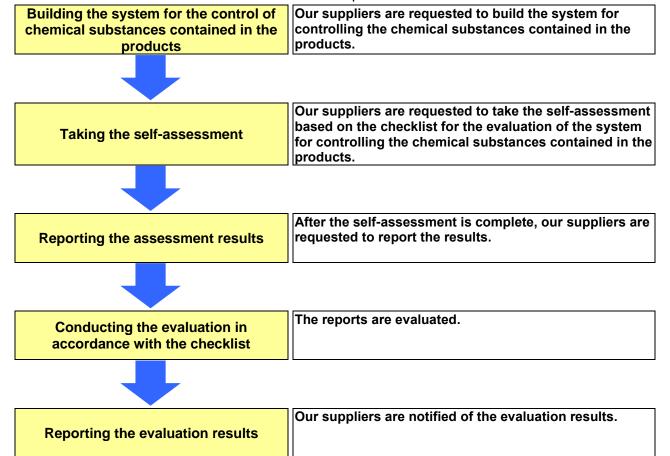
To check the effectiveness of the system for the control of chemical substances contained in the products, which is conducted by each of our suppliers, they are requested to take a self-assessment by using Appendix (1) "Checklist for the evaluation of the system for the control of chemical substances contained in the products".

Note that the system for the control of chemical substances contained in the products is checked in accordance with the flowchart shown below.

- * We will conduct the on-site audit if we deem it necessary.

 When conducting the on-site audit, we would appreciate it if you understand that we check the achievement of the requirements described in the checklist and cooperate with us accordingly.
- * Those of our suppliers, whose scores are less than 60 as a result of the audit conducted in accordance with the checklist, are requested to take corrective measures. If no improvement is observed, we may discontinue the partnership with such suppliers.

<<Flowchart for checking the effectiveness of the system for the control of chemical substances contained in the products>>



- 2-3 Controlling the chemical substances contained in the procured products
 - 1) Standards for the control of chemical substances contained in the products

We handle the substances contained in the delivered items by defining the "Substance groups handled by Topcon Group" and classifying them into the following 2 categories: "Rank A: Prohibited substances (Group)" and "Rank B: Controlled substances (Group)".

Table 1 "Substance groups handled by Topcon Group"

Category	Criteria	Relevant substances (Group)
Rank A: Prohibited substances (Group)	The substances (Group) which may not be contained in or used for all the delivered items.	
Rank B: Controlled substances (Group)	The substances (Group), for which efforts must be made to identify the use conditions and prevent the environmental loads by reducing their quantities, finding alternative substances, etc.	Appendix (2)

2) Request to submit "Statement of mutual agreement about limitations on the use of specified hazardous substances" concerning the procured products

According to the need, we request our suppliers to submit "Statement of mutual agreement about limitations on the use of specified hazardous substances" (Attachment 3) to ensure the control of chemical substances contained in the products concerning the procured products.

Answering formats	References
Statement of mutual agreement about limitations on the use of specified hazardous substances	Attachment 3

3) Request for cooperation in the survey

To aim the declaration of conformity (self-declaration) of the products made by the Topcon group, our suppliers are requested to submit their answers for the survey of the use parts.

In response to the survey we conduct, our suppliers are requested to submit their answers by using the formats shown in item (1) of Table 2 "Items of the survey of use conditions concerning the chemical substances contained in the products" shown below.

Table 2 "Items of the survey of use conditions concerning the chemical substances contained in the products"

(As of August, 2020)

No.	Survey items	Answering formats	References
(1)	Survey on the inclusion	AIS	Maintenance was completed
	and contents of SVHC	MSDS and MSDSPlus	after the update in January
	under the RoHS directive	(materials and material-related	2018.
	revised by EU and the	parts)	
	REACH rules	ChemSHERPA®	URL:
			http://chemsherpa.net/

* In response to future revisions of the standards for the control of chemical substances contained in the

products, the contents of the survey report may be changed.

Also, even if the answers have been already submitted, we may request those answers to be updated

according to the latest information.

4) Request for the analysis measurements

Those suppliers, who may not submit the answers for Table 2 "Items of the survey of use conditions concerning the chemical substances contained in the products", are requested to conduct the analysis

measurements independently and submit the results.

Those suppliers, who not only have not submitted the survey report data designated in Table 2 but

also may not submit the analysis measurements, will be requested to take corrective measures. If no

improvement is observed, we may discontinue the partnership with them.

5) Request for cooperation in the building of the "Environment survey database" (SUMMERS) for

materials and parts

To ensure that the survey on the use conditions concerning the chemical substances contained in the

products is conducted efficiently, we have built the "Environmental survey database" (SUMMERS) by

gathering the survey data on the contents of materials and parts, which are very likely to be adopted in

future (Table 2 "Items of the survey of use conditions concerning the chemical substances

contained in the products" (1)). Therefore, our suppliers are requested to proceed with the data

gathering and submit the data regardless of the purchase records.

If the survey data on the contents of materials and parts are submitted, they are registered in the

"Environment survey database" (SUMMERS) and disclosed to the designers as the information used

for selecting new materials and parts.

[Contact Information]

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