

**TOTO Group**  
**Standards for the Management of**  
**Chemicals in Products**

Version 8.3

Revised in January 2026

TOTO LTD. Supply Chain Division

**TOTO**

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# 1. Objective

This document describes the management criteria for chemicals in the parts and materials constituting the products sold by the TOTO Group (hereinafter referred to as "TOTO Group products"). The objective is to ensure our suppliers are aware of our requirements regarding chemicals in products and comply with them. Through this, we ensure compliance with the laws and regulations applicable to TOTO Group products, reduce environmental impacts, and provide safe and secure products to our customers.

# 2. Scope

These standards shall apply to all TOTO Group products as well as the parts and materials constituting such products (hereinafter referred to as "parts and other components") among the products and services delivered from suppliers to the TOTO Group (hereinafter referred to as "delivered products"). Specifically, these standards shall apply to the management of chemical contained in (1), (2), and (3) below.

## 1) Products

- (1) Goods delivered from the TOTO Group to customers and consumers on a chargeable or non-chargeable basis in its business activities.
- (2) Goods for which the design and manufacturing are outsourced to a third party, goods sold with the TOTO Group trademark, and goods for which the manufacturing is outsourced to other companies and sold with the TOTO Group trademark (so-called OEM products).
- (3) Goods for which the design and manufacturing are outsourced to the TOTO Group from a third party (excluding parts and materials designated by the third party).

## 2) Parts and materials

The parts, materials, and other items used for the products stated in 2-1) "Products" shall be subject to these standards.

- (1) Parts, functional units (including those for repair), and materials
- (2) Raw materials
- (3) Printed materials included in instruction manuals, warranty cards, labels, or the like.

- (4) Subsidiary materials (Among the subsidiary materials defined in 3-12, those that are extremely unlikely to remain in products, such as lubricants and machine oils used for production equipment, are excluded).

### **3) Packaging materials**

Packaging materials of the products sold by the TOTO Group (packaging boxes, vinyl bags, adhesive tape, or the like) and those used for transportation (pallets, shrink films, or the like) are subject to these standards, excluding the following:

- Packaging materials, such as returnable boxes, that are collected and reused under the control of cargo transporters without being disposed of by any company in the TOTO Group, customer, or consumer.
- Packaging and packing materials used only when goods are delivered to TOTO

## **3. Definitions**

For the purpose of this document the following definitions shall apply:

### **1) Prohibited substances**

The substances that are prohibited from being intentionally added to parts and other components or contained beyond the regulation value according to treaties, laws, and regulations.

The TOTO Group prohibits the usage of these substances in the TOTO Group products without exception.

### **2) Restricted Substances**

The substances for which the content volume or concentration is restricted or for which the content or concentration for special use is restricted by laws and regulations. The TOTO Group prohibit the usage of these substances in the products by limiting the providing regions or usage etc.

### **3) Monitoring Substances**

The substances that are required to be displayed or disclosed by laws and regulations when contained in products, parts and other components, or substances for which prohibition or restriction of use is being considered under international treaties or

laws and regulations, and which the TOTO Group is likely to designate as prohibited or restricted substances in the future.

4) Materials conforming to the standards on the emission of formaldehyde and 4 volatile organic compounds (VOCs)

Building materials, regulated by the Building Standards Act (Japan), with performance equivalent to F☆☆☆☆ in the classification based on JIS/JAS standards for the amount of formaldehyde emission, and Building materials that meet the "VOC emission rate standard from building materials" regarding 4-VOC (Toluene/Xylene/Ethylbenzene/Styrene) emission amount, defined by "Study Group on Voluntary Labeling of VOCs Dissipated from Building Materials (Secretariat: Japan Construction Material & Housing Equipment Industries Federation)", and approved to indicate the "4-VOC compliant mark".

5) Contained

All the conditions where specific chemical substances are contained in products, parts, and other components, but not limited to the following examples:

- The condition where substances are intentionally added.
- The condition where substances are contained as impurities.
- The condition where substances are used in manufacturing processes and remain in or adhere to final products, parts, or materials.

6) Intentionally added

The condition where substances are intentionally added to parts and materials to improve performance, functions, appearance, or quality. This includes the condition where substances are used in manufacturing processes or others and are obviously contained in final products.

7) Impurities and Byproducts

Impurities: Substances contained in natural materials that cannot be technically removed during the refining process as industrial materials.

Byproducts: Substances that are generated in the process of synthetic reactions and cannot be technically removed

8) Regulated Value

The value of the limit permitting the inclusion of hazardous substances according to laws and regulations, etc. Chemicals in products are generally determined by the content concentration.

9) Content concentration

The mass concentration that can be obtained from the mass of a chemical substance contained and based on the mass in the unit specified by the applicable law or regulation as the denominator.

10) Homogeneous materials

The materials that cannot be mechanically decomposed into different materials. Examples of homogeneous materials are shown in Reference 1.

11) Packaging material unit

The unit that can be easily decomposed when discarded.

For example, although adhesive tape does not need to be separated into a base material and an adhesive layer, when it is adhered to a corrugated cardboard, the corrugated cardboard and tape are handled as a packaging material unit. In addition, although packaging materials include ink, in the case of the marker pen ink printed on the corrugated cardboard or various types of ink, the cardboard is handled as a packaging material unit.

Examples of the packaging material unit are shown in Reference 2.

12) Subsidiary materials

The materials, such as grease, soldering materials, cleaning agents, and adhesives, used in product manufacturing processes, and those, such as adhesive tapes, sealing materials, adhesives, and repair materials, that are supplied with products and used as construction and repair materials.

## 4. Management Criteria for Chemicals in Products

To ensure the reliable management of chemicals in products, the TOTO Group has established management criteria for chemicals in products and manages according to the classified level defined by the criteria.

The TOTO Group will also add and update chemical substances to be managed in accordance with the addition of chemical substances regulated by treaties, laws and regulations as well as new establishment and revision of treaties, laws and regulations that shall be noted. We will inform the supplier of the contents as appropriate.

Always be sure to manage chemicals in products based on the latest information.

For the latest list of chemical substances to be managed, refer to the “List of Prohibited and Restricted Substances” attached separately.

### 1) Prohibited substances

According to international treaties and laws and regulations, substances whose use is prohibited or restricted by the TOTO Group are designated as "prohibited substances" regardless of country / region or usage.

The requirements for prohibited substances are as follows.

- Prohibit intentional addition to products shipped from the TOTO group and parts constituting the products.
- Not contain more than the regulated value regardless of intentional or unintentional addition. (If substances apply to the regulated value).

For the subject substances and legal regulated values for content, refer to the “List of Prohibited and Restricted Substances: Attached Table 1” that is attached separately.

The main treaties, laws and regulations used as the basis for determining the selection of Prohibited Substances are as follows:

Country/Region	Reference law/regulation
International treaties	- Stockholm Convention on Persistent Organic Pollutants (POPs convention) Annex A (Elimination), Annex B (Restriction), and Annex C (Unintentional production) - Montreal Protocol on Substances that Deplete the Ozone Layer

	<ul style="list-style-type: none"> <li>- Minamata Convention on Mercury</li> <li>- Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (PIC convention) Annex III (Prohibited and restricted substances)</li> </ul>
Japan	<ul style="list-style-type: none"> <li>- Act on the Regulation of Manufacture and Evaluation of Chemical Substances (hereinafter referred to as “Chemical Substances Control Act”) <ul style="list-style-type: none"> <li>Class 1 specified chemical substances (Substances prohibited to be manufactured and imported)</li> </ul> </li> <li>- Act on the Protection of the Ozone Layer Through the Control of Specified Substances, etc. and Other Measures (hereinafter referred to as “Ozone Layer Protection Law”) <ul style="list-style-type: none"> <li>Specific substances</li> </ul> </li> <li>- Article 55 of the Industrial Safety and Health Act (hereinafter referred to as “Safety and Health Act”) <ul style="list-style-type: none"> <li>Hazardous substances prohibited to be manufactured</li> </ul> </li> <li>- Building Standards Act <ul style="list-style-type: none"> <li>Prohibited substances</li> </ul> </li> <li>- Poisonous and Deleterious Substances Control Act (Poisonous and Deleterious Act)</li> <li>- Act on the Control of Household Products Containing Harmful Substances (Household Products Control Act)</li> </ul>
EU	<ul style="list-style-type: none"> <li>- The POPs Regulation <ul style="list-style-type: none"> <li>Annex I (Prohibited substances), Annex II (Restricted substances), and Annex III (Reduced substances)</li> </ul> </li> <li>- Regulation on substances that deplete the ozone layer</li> <li>- Regulations on Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH regulation) <ul style="list-style-type: none"> <li>Annex XVII (Restricted substances)</li> </ul> </li> </ul>
United States	<ul style="list-style-type: none"> <li>- Taxes on Ozone-Depleting Chemicals</li> <li>- Title VI of the Clean Air Act: Stratospheric Ozone Protection</li> <li>- Toxic Substances Control Act (TSCA)</li> </ul>

## 2) Restricted substances

According to international treaties, laws and regulations, substances whose use is prohibited or restricted by the TOTO Group, and not included in the list of "Prohibited substances" are designated as "Restricted substances".

The requirements for restricted substances are as follows.

- Prohibit intentional addition to products and parts or more than the regulated value by limiting the scope of application (countries / regions, usage, etc.)

For the subject substances, refer to "List of Prohibited and Restricted Substances: Attached Table 2" that is attached separately.

The main treaties, laws and regulations used as the basis for determining the selection of Prohibited Substances are as follows:

- Restriction of the Use of Specific Hazardous Substances in Electrical and Electronic Equipment (RoHS regulation of various countries)  
EU, China, Korea, Middle East, Southeast Asian Countries, and so on
- Restriction of the Use of Heavy Metals in Packaging Materials  
United States, EU, China, Korea, and so on
- Regulations of Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH regulation), Annex XVII (Restricted substances)

## 3) Monitoring Substances

The TOTO Group manages information on the inclusion of monitoring substances in materials, parts, and other components delivered to the TOTO Group, as well as their Safety Data Sheets (SDS). Additionally, the TOTO Group monitors and manages these substances based on established operational standards in accordance with legal requirements to ensure compliance with laws and regulations.

Although the inclusion of such substances in the materials, parts and other components delivered to the TOTO Group is not currently restricted, these substances are suspected to negatively impact human health and the environment.

Therefore, reducing use and replacing these substances with substitutes are recommended in the future. Information on inclusion needs to be collected and reported in accordance with laws, regulations, and other relevant stipulations.

If the provision of information on substances is required by laws and regulations or if their applications are updated, it is requested to provide the information on the inclusion of such chemical substances.

For substances of very high concern (SVHC) stipulated in REACH regulation, refer to the list provided on the European Chemicals Agency (ECHA) website (updated around January and July each year):

< Candidate List of substances of very high concern for Authorization >

<https://echa.europa.eu/candidate-list-table>

Provision of information on the inclusion of other subject substances will be requested by the TOTO Group when needed.

The main treaties, laws, and regulations used as the basis for determining the subject substances are as follows:

Country/Region	Reference law/regulation
International treaties,	<ul style="list-style-type: none"> <li>• Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (PIC convention) Annex III (Subject substances)</li> </ul>
Japan	<ul style="list-style-type: none"> <li>• Chemical Substances Control Act Class 2 specified chemical substances</li> <li>• Law for Promotion of Effective Utilization of Resources (J-MOSS)</li> </ul>
EU	<ul style="list-style-type: none"> <li>• REACH regulation, SVHC</li> <li>• Regulation Concerning the Export and Import of Hazardous Chemicals (PIC regulation) Annex I (Subject substances)</li> </ul>
United States	<ul style="list-style-type: none"> <li>• California's Safe Drinking Water and Toxic Enforcement Act of the State of California (Proposition 65)</li> </ul>

#### **4) Materials conforming to the standards on the Emission of Formaldehyde and 4 VOCs**

Wooden building materials and their related products sold by the TOTO Group in Japan shall conform to the standards on the emission of formaldehyde and 4 volatile organic compounds (VOCs) as defined in “3. Definitions” of this standard. The TOTO Group has established operational standards for formaldehyde F☆☆☆☆ and 4 VOCs (toluene, xylene, ethylbenzene, and styrene). For the measures against formaldehyde and 4 VOCs based on spaces, parts, and materials, the building materials subject to notification, and the building materials subject to labeling of 4 VOCs, refer to the separately attached “List of Prohibited and Restricted Substances: Attached Table 4”.

### **5. Request to Suppliers**

#### **1) Implementation of appropriate management of chemical substances in products and compliance with requirements according to management level.**

- Suppliers are requested to comply with the latest version of “TOTO Group Standards for the Management of Chemicals in Products”.
- Suppliers are requested to confirm and guarantee that the delivered products meet these standards.
- Suppliers are requested to provide these standards to their suppliers and subcontractors, and to instruct them to comply with the requirements.
- If revision is made to these standards and new substances are added, or scope, or regulated value is changed, or if the TOTO Group determines that the existing guarantee is insufficient, suppliers are requested to resubmit the non-use guarantee.

#### **2) Establishment and maintenance of a management system for chemicals in products**

- To ensure continual compliance with these standards and to prevent prohibited and restricted substances from being contained in delivered products, suppliers are

requested to establish their own chemical substance management system depending on their types of industry, type of business, and business content.

- "The Guidelines for the Management of Chemical Substances in Products" issued by JAMP is useful reference when establishing a system for managing chemicals in products.

JAMP (Joint Article Management Promotion-consortium)

<https://chemsherpa.net/>

- To keep the management system effective, please carry out self-check periodically and improve if necessary.
- Suppliers who have delivered products to which the RoHS Directive of each country is applied are evaluated for their management status of chemical substances contained in the products using our "Chemical Substance Risk Assessment Self-Check Sheet" as necessary.

### 3) Documents to be submitted

The guarantee of non-use and various types of documents shall be submitted to show that the content of a prohibited or restricted substance in the delivered products does not exceed the regulated value or that the requirements of laws, regulations, and other stipulations are satisfied. If requested by the TOTO Group, please fill in such documents and submit them by the requested date.

The list of the documents to be submitted according to each management category is as follows:

<List of documents to be submitted>

Management category	Subject	Requirement	Document to be submitted
Prohibited substance	All the products, parts, and raw materials sold by TOTO Group	Prohibition of intentional addition	<ul style="list-style-type: none"> <li>• Guarantee of Non-Use of Prohibited Substances &amp; Restricted Substances (Form 1, Type A)</li> </ul>
Restricted substance	Products, parts and raw materials designated by the TOTO Group	Prohibition of inclusion exceeding the legally	<ul style="list-style-type: none"> <li>• Guarantee of Non-Use of Prohibited Substances &amp; Restricted Substances (Form 1, Type B)</li> <li>• List of materials constituting products</li> </ul>

	defined maximum value.	<ul style="list-style-type: none"> <li>Component analysis table (Analysis data) *Any format can be acceptable for “list of materials constituting products” and “component analysis table (analysis data)”.</li> </ul>
Products not subject to the RoHS Directive and parts and materials configuring them	Prohibition of inclusion exceeding the legally defined maximum value.	<ul style="list-style-type: none"> <li>Guarantee of Non-Use of Prohibited Substances &amp; Restricted Substances (Form 1, Type C)</li> </ul>
Packaging materials regulation in the EU and the U.S.	Prohibition of inclusion exceeding the legally defined maximum value.	<ul style="list-style-type: none"> <li>Guarantee of Non-Use of Prohibited Substances &amp; Restricted Substances (Form 1, Type D)</li> <li>List of materials constituting products</li> <li>Component analysis table (Analysis data) * Any format can be acceptable for “list of materials constituting products” and “component analysis table (analysis data)”.</li> </ul>
Products subject to the RoHS of each country and parts and materials configuring them	Prohibition of inclusion exceeding the legally defined maximum value.	<ul style="list-style-type: none"> <li>Guarantee of Non-Use of Prohibited Substances &amp; Restricted Substances (Form 1, Type E)</li> </ul>
Products, parts and materials regulated in the U.S.	Prohibition of inclusion exceeding the legally defined maximum value.	<ul style="list-style-type: none"> <li>Guarantee of Non-Use of Prohibited Substances &amp; Restricted Substances (Form 1, Type F)</li> </ul>

Substances to be monitored	Substances of Very High Concern (SVHC)	To be reported if the content is 0.1 wt% or higher	<ul style="list-style-type: none"> <li>The concentration and content shall be reported</li> <li>*No template (Using a tool such as chem SHERPA is recommended)</li> </ul>
	Substances required by other individual laws, regulations, and so on	Specified in individual written requests	<ul style="list-style-type: none"> <li>The requested matters and documents to be submitted are notified at each request</li> </ul>
Conforming materials	Products that are sold in Japan to be installed in a living room or a space equivalent to a living room	Target value or lower	<p>&lt;Formaldehyde F☆☆☆☆&gt;</p> <ul style="list-style-type: none"> <li>Application for conformance to formaldehyde F☆☆☆☆</li> <li>A document certifying that the formaldehyde emission is at the target value or lower</li> </ul> <p>&lt;4 VOCs&gt;</p> <ul style="list-style-type: none"> <li>Application for conformance to the 4 VOCs standards</li> <li>A document certifying that the emissions of 4 VOCs are at the target values or lower</li> </ul>

#### 4) Provision of Information on Chemicals in Products

To manage and assure the chemicals in products reliably, it is necessary to collect and maintain accurate information on chemicals throughout the supply chain.

Suppliers may also be requested to provide information on specific chemical substances not listed in these standards based on the legal requirements of each country/region and requests from our customers.

Your cooperation in promptly submitting documents, such as non-use guarantees and investigation reports, when requested by the TOTO Group, is appreciated.

## 5) Change Management

When any changes are made to the processes and materials for products delivered to the TOTO Group that affect the management of chemicals in products and their components, it is necessary to submit a Request for Change Review and to obtain approval in advance.

If needed, you may also be requested to resubmit information on the contained chemical substances for examining the change.

Additionally, in the event of a change to our requirements as outlined below, it may be requested to re-investigate the chemical substances in all or specific delivered products and resubmit the results, if the TOTO Group determines it necessary.

Example 1) Revision of the “TOTO Group Standards for the Management of Chemicals in Products”

Example 2) Revision and new establishment of laws and regulations

Example 3) Change or addition of customer requirements

## 6. List of Forms to be Submitted and Attached Tables

Reference 1	Examples of homogeneous materials
Reference 2	Examples of packing material units
Form1 Type A	Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Prohibited substance)
Form 1 Type B	Guarantee of Non-Use of Prohibited Substances & Restricted Substances (All Restricted Substances)
Form 1 Type C	Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Products Not Subject to RoHS Directive)
Form 1 Type D	Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Packaging materials for Europe and the USA)
Form 1 Type E	Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Products Subject to RoHS in each country)
Form 1 Type F	Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Products for the USA)
Form 2	(Japanese only)
Form 3	(Japanese only)

For the following attached tables, refer to “List of Prohibited and Restricted Materials” that is attached separately.

Attached Table 1	List of prohibited substances
Attached Table 1-2	List of representative substances of prohibited substances
Attached Table 1-3	List of exclusions from application of prohibited substances
Attached Table 2	Examples of Substances Subject to EU Standards Concerning Restricted Substances
Attached Table 2-2	Table of specific amines that should not be generated
Attached Table 2-3	List of Specific Use Subject to Regulation of EU Standards Concerning Restricted Substances
Attached Table 2-4	List of exclusions from application of operation standards regarding prohibited substances
Attached Table 3	(Japanese only)
Attached Table 3-2	(Japanese only)
Attached Table 3-3	(Japanese only)
Attached Table 3-4	(Japanese only)
Attached Table 4	Examples of Substances Subject to U.S. laws

## 7. Revision History

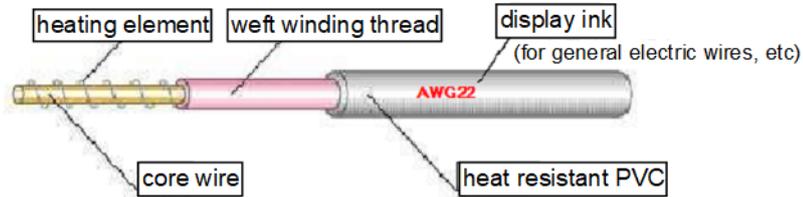
Establishment: April 2010

<b>Year and month of revision</b>	<b>Version No.</b>	<b>Details of revision</b>
April 2011	Version 2	Overall review following the revision of company rules
June 2013	Version 3	Change of organization names and company name following the integration of group companies
April 2017	Version 4	Addition of prohibited substances following the revision of a law
May 2018	Version 5	Addition of prohibited substances following the revision of a law
June 2021	Version 6	Addition of prohibited and restricted substances following the revision of a law
January 2022	Version 7	Overall review of the structure and layout intended to clarify the requested matters Change of the document name of (former) chemical substance management standard (product edition)
July 2024	Version 8	Addition of prohibited and restricted substances. Revision of "Form1" (Guarantee of Non-Use of Prohibited Substances & Restricted Substances)
September 2024	Version 8.1	Corrected the description in [6. List of Forms to be Submitted and Attached Tables]
June 2025	Version 8.2	Replacement due to "Form 1" version change (Ver. 4 to Ver. 5), specifically correcting a typo in Type B, C and D.
January 2026	Version 8.3	Modification of sample form

<Reference 1 Examples of homogeneous materials>

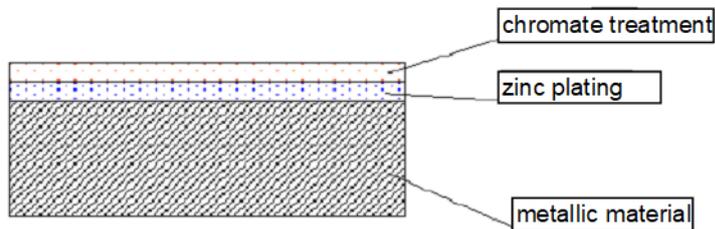
[Case 1] Heater wire

Component parts: core wire, heating element, weft winding thread, insulator, display ink



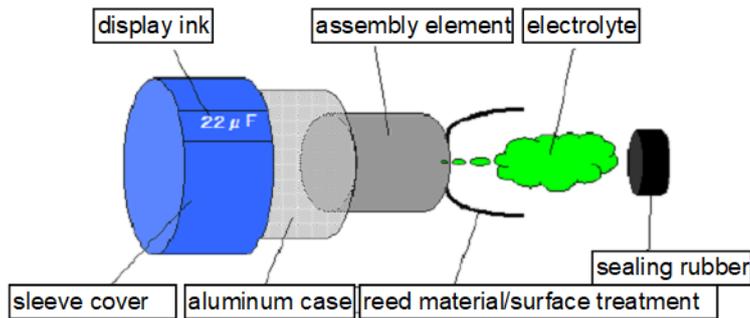
[Case 2] Plating on metal materials

Component parts: metallic material, zinc plating, chromate treatment

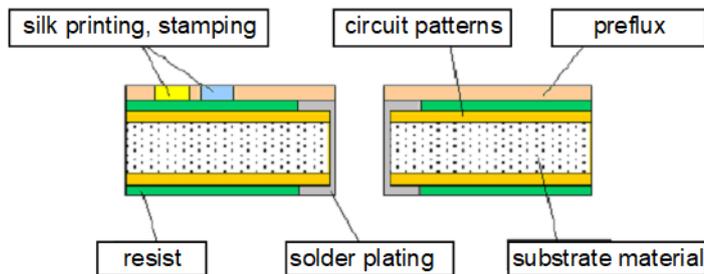


[Case 3] Aluminum electrolytic capacitor

Component parts: sleeve cover, display ink, aluminum case, assembly element, reed material, surface treatment on reed material, electrolyte, sealing rubber



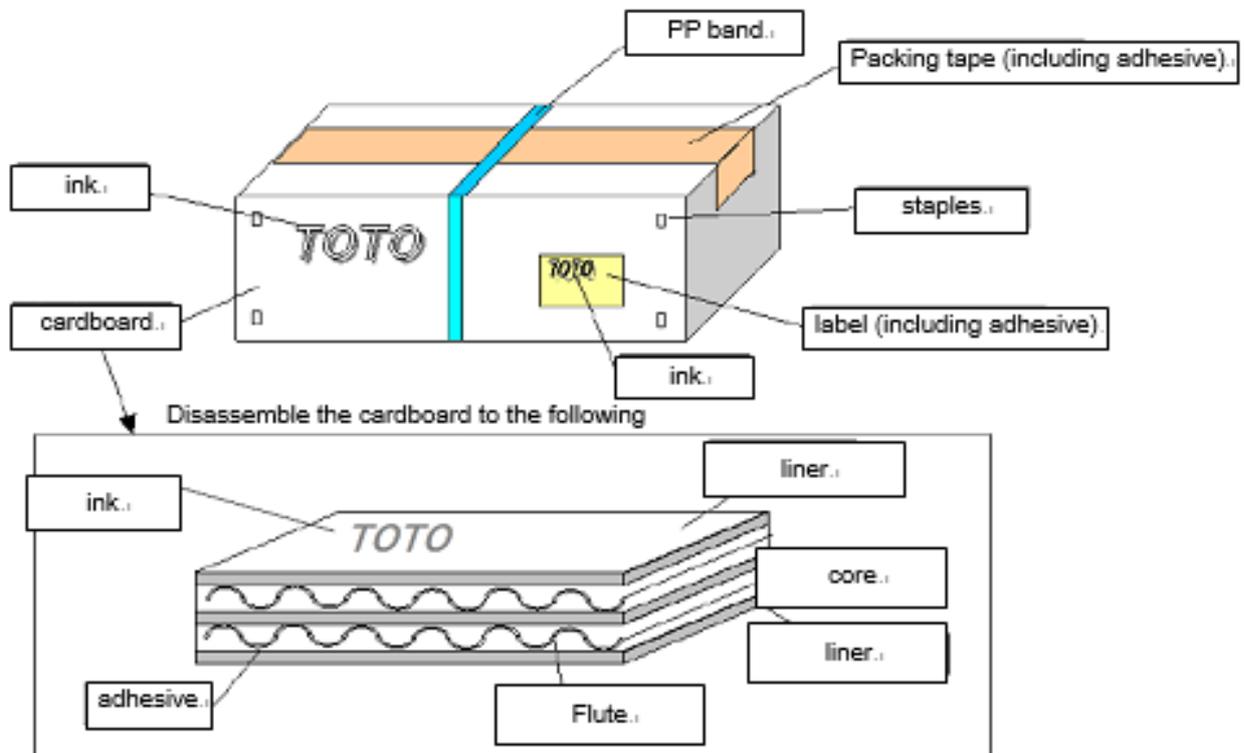
[Case 4] Printed circuit board



<Reference 2 Examples of packing material units >

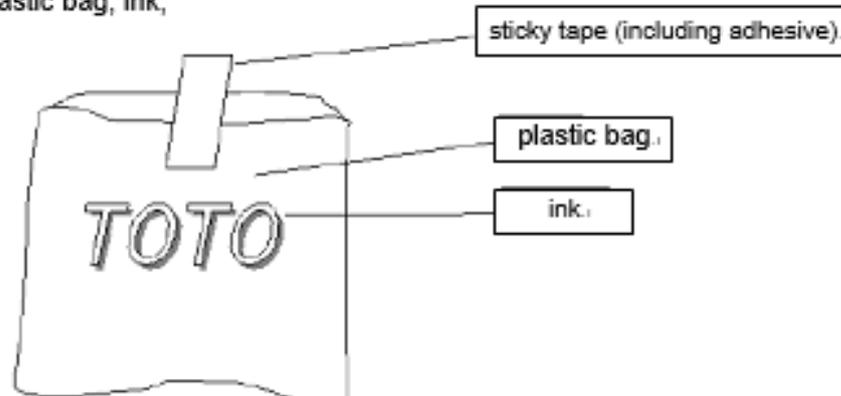
[Case 1] Around the outer box.

Component parts: cardboard, ink, packing tape, label, staples, PP



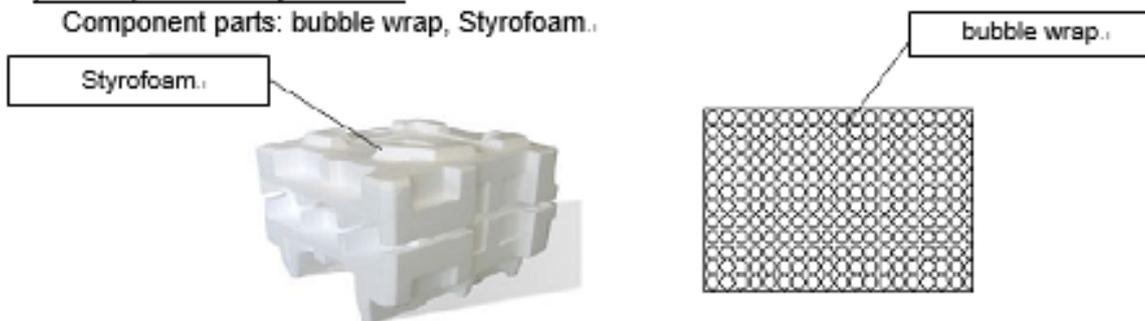
[Case 2] Plastic Bags.

Component parts: plastic bag, ink,



[Case 3] Cushioning materials.

Component parts: bubble wrap, Styrofoam.





# <Form1 Type B>

To TOTO Group

Date:

## Guarantee of Non-Use of Prohibited Substances & Restricted Substances

Our company shall submit Type **B** Guarantee.

### Type

- A : Group I
- B : Group I + II + III + IV + V (All Restricted Substances)
- C : Group I + IV (Products Not Subject to RoHS Directive)
- D : Group I + II + IV (Packaging materials for Europe and the USA)
- E : Group I + II + III (Products Subject to RoHS in each country)
- F : Group I + V (Products for the USA)

Corporate Seal

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_

Responsible Person: \_\_\_\_\_

Our company shall guarantee that we shall not intentionally add the chemical substances listed below (for the chemical substances for which regulation values are stipulated by laws and regulations, the values shall not be exceeded regardless of intentional or unintentional addition) to the following parts and other components delivered to the TOTO Group directly or through third parties (including parts, raw materials, and subsidiary materials, such as accessory parts).

If there is a change in the guarantee, or if there is an addition or change to the prohibited or restricted substances specified by your company, we will promptly resubmit the applicable Guarantee of Non-Use.

### Prohibited Substances (Refer to Table1 for details of substances)

Group	No	Substance Name or Substance Group Name	No	Substance Name or Substance Group Name
I	1	Chlorofluorocarbon(CFC)	29	[1,1'-Biphenyl]-4,4'-diamine and its salts*
	2	halon	30	Phosphorethioic acid, O,O-diethyl O-(3,5,6-trichloro-2-pyridinyl) ester
	3	Methane, tetrachloro-	31	Perfluorooctanesulfonic Acid
	4	Ethane, 1,1,1-trichloro-	32	Perfluoro-n-octanesulfonyl Fluoride
	5	Hydrobromofluorocarbon(HBFC)	33	Pentachlorobenzene
	6	Methane, bromochloro-	34	alpha-Hexachlorocyclohexane
	7	Methane, bromo-	35	beta-Hexachlorocyclohexane
	8	Asbestos*	36	gamma-Hexachlorocyclohexane
	9	Polychlorinated biphenyls (PCB)	37	Chlordecone (Kepone)
	10	Polychlorinated naphthalenes (PCN)	38	Polybrominated Biphenyls (PBBs)
	11	Benzene, hexachloro-	39	Tetrabromodiphenyl ether
	12	aldrin	40	Pentabromodiphenyl ether
	13	dieldrin	41	Hexabromodiphenyl ether
	14	endrin	42	Heptabromodiphenyl ether
	15	Dichloro Diphenyl Trichloroethane (DDT)	43	Endosulfan (Benzoepin)
	16	Chlordane, pur	44	Hexabromocyclododecane(HBCD)
	17	Tributyl tin compounds	45	Pentachlorophenol (PCP)
				Polychlorinated paraffins (C10-13)(SCCPs)
	21	dodecachloropentacyclo[5.2.1.02.1.02.6.03.9.05.8]decane	49	PFOA-related compounds
	22	dicofof	50	Polychlorinated Terphenyls (PCTs)*
	23	1,3-Butadiene, 1,1,2,3,4,4-hexachloro-	51	Tetraethyl lead
	24	Phenol, 2-(2H-benzotriazol-2-yl)-4,6-bis(1,1-dimethylethyl)-	52	Tetramethyl lead
	25	Methane, oxybis(chloro-*	53	Tris(2,3-dibromopropyl)phosphate
	26	Biphenyl-4'-ylamine and its salts*	54	Mercury and mercury compounds
	27	2-Naphthalenamine and its salts*	55	Hydrochlorofluorocarbon (HCFC)
	28	4-nitrobiphenyl and its salts*	56	Perfluorohexane-1-sulphonic acid and its salts (PFHxS) and its salts

### Restricted Substances (Refer to Table2 for details of substances)

Group	No	Substance Name or Substance Group Name	Laws and Regulations	Regulation Value	
II	1	Mercury and its compounds *	*RoHS *Packaging materials	RoHS:<1000ppm	
	2	Lead and its compounds *		RoHS:<1000ppm	
	3	Cadmium and its compounds *		RoHS:<100ppm	
	4	Hexavalent chromium compounds *		RoHS:<1000ppm	
III	5	PBBs (polybrominated biphenyl) *	*RoHS	RoHS:<1000ppm	
	6	PBDEs (polybromodiphenyl ether) *		RoHS:<1000ppm	
IV	7	Bis (2-ethylhexyl) phthalate (DEHP) *	*REACH ANNEX 17 *French mineral oil regulation	Less than 1000ppm with one of No. 7 to 10 or any combination.	
	8	Butyl benzyl phthalate (BBP) *			
	9	Dibutyl phthalate (DBP) *			
	10	Diisobutyl phthalate (DIBP) *			
	12	Polychlorinated terphenyls (PCT) *			Less than 50ppm
	13	Azo dye that generates some aromatic amines *			Less than 30ppm as a specific amine
	14	Monomethyl-tetrachloro-diphenylmethane			Intentional addition prohibited
	15	Monomethyl-dichloro-diphenylmethane			Intentional addition prohibited
	16	Monomethyl-dibromo-diphenylmethane (DBBT)			Intentional addition prohibited
	17	Dibutyl tin compound (DBT) *			Less than 1000ppm
	18	Diocetyl tin compound (DOT) *			Less than 1000ppm
	19	Trisubstituted organotin compound *			Less than 1000ppm
	20	Dimethyl fumarate (DMF) *	Less than 0.1 ppm		
				Less than 1.0ppm	
	23	Perfluorocarboxylic acid (C9-C14) (PFCA) *			
	24	Mineral oil aromatic hydrocarbons containing 1 to 7 aromatic rings (MOAH)		Mass concentration in ink shall be less than 0.1% or Mass concentration of compounds with 3 to 7 aromatic rings shall be less than 1 ppm.	
	25	Saturated hydrocarbons in mineral oil containing 16 to 35 carbon atoms (MOSH)		Mass concentration in ink shall be less than 0.1%.	
V	26	Phenol, Isopropylated Phosphate (3:1) (PIP(3:1))	*TSCA	Intentional addition prohibited	

The above prohibited and restricted substances are international treaties (POPs Convention, PIC Convention, Montreal Protocol, Minamata Convention, etc.), representative national laws and regulations (European REACH Regulation, RoHS Directive, Packaging Material Directive, Japan Building Standard Law, Safety and Health Law, etc.). Substances with (\*) after the substance name are substances for which legal content regulation values are stipulated by these conventions and laws.

### List of Delivered Parts Subject to Guarantee of Non-Use of Restricted Substances

Name	Item No.	Name	Item No.

This guarantee shall be valid unless we are requested to change the information in this guarantee from our company and the TOTO Group.

<Form1 Type C>

To TOTO Group

Date:

**Guarantee of Non-Use of Prohibited Substances & Restricted Substances**

Our company shall submit Type **C** Guarantee.

Corporate Seal

Type	Company Name:
A : Group I	_____
B : Group I + II + III + IV + V (All Restricted Substances)	_____
C : Group I + IV (Products Not Subject to RoHS Directive)	_____
D : Group I + II + IV (Packaging materials for Europe and the USA)	Address: _____
E : Group I + II + III (Products Subject to RoHS in each country)	_____
F : Group I + V (Products for the USA)	Responsible Person: _____

Our company shall guarantee that we shall not intentionally add the chemical substances listed below (for the chemical substances for which regulation values are stipulated by laws and regulations, the values shall not be exceeded regardless of intentional or unintentional addition) to the following parts and other components delivered to the TOTO Group directly or through third parties (including parts, raw materials, and subsidiary materials, such as accessory subparts).

If there is a change in the guarantee, or if there is an addition or change to the prohibited or restricted substances specified by your company, we will promptly resubmit the applicable Guarantee of Non-Use.

**Prohibited Substances (Refer to Table1 for details of substances)**

Group	No	Substance Name or Substance Group Name	No	Substance Name or Substance Group Name
I	1	Chlorofluorocarbon(CFC)	29	[1,1'-Biphenyl]-4,4'-diamine and its salts*
	2	halon	30	Phosphorothioic acid, O,O-diethyl O-(3,5,6-trichloro-2-pyridinyl) ester
	3	Methane, tetrachloro-	31	Perfluorooctanesulfonic Acid
	4	Ethane, 1,1,1-trichloro-	32	Perfluoro-n-octanesulfonyl Fluoride
	5	Hydrobromofluorocarbon(HBFC)	33	Pentachlorobenzene
	6	Methane, bromochloro-	34	alpha-Hexachlorocyclohexane
	7	Methane, bromo-	35	beta-Hexachlorocyclohexane
	8	Asbestos*	36	gamma-Hexachlorocyclohexane
	9	Poly chlorinated biphenyls (PCB)	37	Chlordane (Kepone)
	10	Poly chlorinated naphthalenes (PCN)	38	Polybrominated Biphenyls (PBBs)
	11	Benzene, hexachloro-	39	Tetrabromodiphenyl ether
	12	aldrin	40	Pentabromodiphenyl ether
	13	dieldrin	41	Hexabromodiphenyl ether
	14	endrin	42	Heptabromodiphenyl ether
	15	Dichloro Diphenyl Trichloroethane(DDT)	43	Endosulfan (Benzoepin)
	16	Chlorane, pur	44	Hexabromocyclododecane(HBCDD)
	17	Tributyl tin compounds	45	Pentachlorophenol(PCP)
	18	1,4-Benzenediamine, NN'-bis(methylphenyl)-	46	Short chain chlorinated paraffins (C10-13)(SCCPs)
	19	Phenol, 2,4,6-tris(1,1-dimethylethyl)-	47	Decabromodiphenyl ether(decaBDE)
	20	Tetrachloroethane	48	Perfluorooctanoic acid(PFOA), its salts
	21	1,2-Dichloroethane		
	22	1,1,1,2-Tetrachloroethane		
	23	1,3-Dioxane		
	24	Phenol, 2-(2H-benzotriazol-2-yl)-4,6-bis(1,1-dimethylethyl)-	52	Tetramethyl lead
	25	Methane, oxybis(chloro)*	53	Tris(2,3 dibromopropyl)phosphate
	26	Biphenyl-4-ylamine and its salts*	54	Mercury and mercury compounds
	27	2-Naphthalenammine and its salts*	55	Hydrochlorofluorocarbon (HCFC)
	28	4-nitrobiphenyl and its salts*	56	Perfluorohexane-1-sulphonicacid and its salts (PFHxS) and its salts

**Restricted Substances (Refer to Table2 for details of substances)**

Group	No	Substance Name or Substance Group Name	Laws and Regulations	Regulation Value
II	1	Lead and its compounds in polyvinyl chloride (PVC)*		Less than 1000ppm
	7	Bis (2-ethylhexyl) phthalate (DEHP) *		
	8	Butyl benzyl phthalate (BBP) *		Less than 1000ppm with one of No.7 to 10 or any combination.
	9	Dibutyl phthalate (DBP) *		
	10	Diisobutyl phthalate (DIBP) *		
	12	Poly chlorinated biphenyls (PCB)*	*REACH ANNEX 17	Less than 50ppm
	13	Polycyclic aromatic hydrocarbons (PAH)*		Less than 30ppm as a specific name
	16	Monomethyl-dibromo-diphenylmethane (DBBT)		International agreement prohibited
	17	Dibutyl tin compound (DBT) *		Less than 1000ppm
	18	Diocetyl tin compound (DOT) *		Less than 1000ppm
	19	Trisubstituted organotin compound *		Less than 1000ppm
	IV	20	Dimethyl fumarate (DMF) *	
21		Poly cyclic aromatic hydrocarbon (PAH) *		Less than 1ppm
22		Phenyl mercury *		Less than 100ppm
23		Perfluorocarboxylic acid (C9-C14) (PFCA) *		PFCA's: Less than 25ppb Total related substances: Less than 280ppb
24		Mineral oil aromatic hydrocarbons containing 1 to 7 aromatic rings (MOAH)		Mass concentration in ink shall be less than 0.1% or Mass concentration of compounds with 3 to 7 aromatic rings shall be less than 1 ppm
25		Saturated hydrocarbons in mineral oil containing 16 to 35 carbon atoms (MOSH)		Mass concentration in ink shall be less than 0.1%

The above prohibited and restricted substances are international treaties (POPs Convention, PIC Convention, Montreal Protocol, Minamata Convention, etc.), representative national laws and regulations (European REACH Regulation, RoHS Directive, Packaging Material Directive, Japan Building Standard Law, Safety and Health Law, etc.). Substances with (\*) after the substance name are substances for which legal content regulation values are stipulated by these conventions and laws.

**List of Delivered Parts Subject to Guarantee of Non-Use of Restricted Substances**

Name	Item No.	Name	Item No.

This guarantee shall be valid unless we are requested to change the information in this guarantee from our company and the TOTO Group.

<Form1 Type D>

To TOTO Group

Date:

**Guarantee of Non-Use of Prohibited Substances & Restricted Substances**

Our company shall submit Type **D** Guarantee.

<b>Type</b>		
A : Group I		Corporate Seal
B : Group I + II + III + IV + V (All Restricted Substances)	Company Name:	
C : Group I + IV (Products Not Subject to RoHS Directive)	Address:	
D : Group I + II + IV (Packaging materials for Europe and the USA)	Responsible Person:	
E : Group I + II + III (Products Subject to RoHS in each country)		
F : Group I + V (Products for the USA)		

Our company shall guarantee that we shall not intentionally add the chemical substances listed below (for the chemical substances for which regulation values are stipulated by laws and regulations, the values shall not be exceeded regardless of intentional or unintentional addition) to the following parts and other components delivered to the TOTO Group directly or through third parties (including parts, raw materials, and subsidiary materials, such as accessory subparts).

If there is a change in the guarantee, or if there is an addition or change to the prohibited or restricted substances specified by your company, we will promptly resubmit the applicable Guarantee of Non-Use.

**Prohibited Substances (Refer to Table1 for details of substances)**

Group	No	Substance Name or Substance Group Name	No	Substance Name or Substance Group Name
I	1	Chlorofluorocarbon(CFC)	29	[1,1'-Biphenyl]-4,4'-diamine and it's salts*
	2	halon	30	Phosphorothioic acid, O,O-diethyl O-(3,5,6-trichloro-2-pyridinyl) ester
	3	Methane, tetrachloro-	31	Perfluorooctanesulfonic Acid
	4	Ethane, 1,1,1-trichloro-	32	Perfluoro-n-octanesulfonyl Fluoride
	5	Hydrobromofluorocarbon(HBFC)	33	Pentachlorobenzene
	6	Methane, bromochloro-	34	alpha-Hexachlorocyclohexane
	7	Methane, bromo-	35	beta-Hexachlorocyclohexane
	8	Asbestos*	36	gamma-Hexachlorocyclohexane
	9	Polychlorinated biphenyls (PCB)	37	Chlorodecane (Kepone)
	10	Polychlorinated naphthalenes (PCN)	38	Poly brominated Biphenyls (PBBs)
	11	Benzene, hexachloro-	39	Tetrabromodiphenyl ether
	12	aldrin	40	Pentabromodiphenyl ether
	13	dieldrin	41	Hexabromodiphenyl ether
	14	endrin	42	Heptabromodiphenyl ether
	15	Dichloro Diphenyl Trichloroethane (DDT)	43	Endosulfan (Benzoepin)
	16	Chlordane, pur	44	Hexabromocyclododecane (HBCD)
	17	Tributyltin compounds	45	Pentachlorophenol (PCP)
20	Toxaphene			
21	dodecachloropentacyclo[5.2.1.02.6.03.9.05.8]decane	49	PFOA-related compounds	
22	dicofol	50	Polychlorinated Terphenyls (PCTs)*	
23	1,3-Butadiene, 1,1,2,3,4,4-hexachloro-	51	Tetraethyl lead	
24	Phenol, 2-(2H-benzotriazol-2-yl)-4,6-bis(1,1-dimethylethyl)-	52	Tetramethyl lead	
25	Methane, oxybis(chloro)-*	53	Tris(2,3 dibromopropyl)phosphate	
26	Biphenyl-4-ylamine and it's salts*	54	Mercury and mercury compounds	
27	2-Naphthalenamine and it's salts*	55	Hydrochlorofluorocarbon (HCFC)	
28	4-nitrobiphenyl and it's salts*	56	Perfluorohexane-1-sulphonicacid and its salts (PFHxS) and its salts	

**Restricted Substances (Refer to Table2 for details of substances)**

Group	No	Substance Name or Substance Group Name	Laws and Regulations	Regulation Value
II	1	Mercury and its compounds *	•RoHS •Packaging materials	Total values of heavy metals of 1 to 4 are less than 100 ppm.
	2	Lead and its compounds *		
	3	Cadmium and its compounds *		
	4	Hexavalent chromium compounds *		
IV	7	Bis (2-ethylhexyl) phthalate (DEHP) *	•REACH ANNEX17 •French mineral oil regulation	Less than 1000ppm with one of No. 7 to 10 or any combination. Less than 50ppm Less than 30ppm as a specific amine Intentional addition prohibited Intentional addition prohibited Intentional addition prohibited Less than 1000ppm Less than 1000ppm Less than 1000ppm Less than 0.1ppm Less than 1ppm Less than 100ppm
	8	Butyl benzyl phthalate (BBP) *		
	9	Dibutyl phthalate (DBP) *		
	10	Diisobutyl phthalate (DIBP) *		
	12	Polychlorinated terphenyls (PCT) *		
	13	Azo dye that generates some aromatic amines *		
	14	Monomethyl-tetrachloro-diphenylmethane		
	15	Monomethyl-dichloro-diphenylmethane		
	16	Monomethyl-dibromo-diphenylmethane (DBBT)		
	17	Dibutyl tin compound (DBT) *		
	18	Diocetyl tin compound (DOT) *		
	19	Trisubstituted organotin compound *		
	20	Dimethyl fumarate (DMF) *		
21	Polycyclic aromatic hydrocarbon (PAH) *			
V	24	Mineral oil aromatic hydrocarbons containing 1 to 7 aromatic rings (MOAH)		aromatic rings shall be less than 1 ppm
	25	Saturated hydrocarbons in mineral oil containing 16 to 35 carbon atoms (MOSH)		Mass concentration in ink shall be less than 0.1%
	26	Phenol, Isopropylated Phosphate (3:1) (PIP(3:1))	•TSCA	Intentional addition prohibited

The above prohibited and restricted substances are international treaties (POPs Convention, PIC Convention, Montreal Protocol, Minamata Convention, etc.), representative national laws and regulations (European REACH Regulation, RoHS Directive, Packaging Material Directive, Japan Building Standard Law, Safety and Health Law, etc.). Substances with (\*) after the substance name are substances for which legal content regulation values are stipulated by these conventions and laws.

**List of Delivered Parts Subject to Guarantee of Non-Use of Restricted Substances**

Name	Item No.	Name	Item No.

This guarantee shall be valid unless we are requested to change the information in this guarantee from our company and the TOTO Group.



