

TOTO Group

Standards for the Management of Chemicals in Products

Version 7

Revised in January 2022

TOTO LTD. Supply Chain Promotion Division

TOTO

<Table of Contents>

1. Objective	3
2. Scope	3
1) Products	3
2) Parts and materials.....	3
3) Packaging materials.....	4
3. Definitions	4
4. Standards for the Management of Chemical Substances	7
1) Prohibited substances	7
2) Restricted substances.....	8
3) Monitoring Substances	9
4) Materials conforming to the standards on the emission of formaldehyde and 4 VOCs	10
5. Request to Suppliers	11
1) Implementation of appropriate management of chemical substances in products and compliance with requirements according to management level.	11
2) Establishment and maintenance of a management system for chemical substances contained in products	11
3) Documents to be submitted	12
5) Change Management	14
6. List of Forms to be Submitted and Attached Tables	15
7. Revision History	16

1. Objective

This document describes the management criteria for chemicals in the parts and materials constituting the products sold by TOTO Group (hereinafter referred to as "TOTO Group products").

The objective is to ensure our suppliers to aware of our requirements that shall be complied with about chemicals in products and to comply them.

Through this, we ensure to comply with the laws and regulations of TOTO Group products and reduce the 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 that are 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 that are 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, the ones that are extremely unlikely to remain in products, such as lubricants and machine oils that are 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 the ones used for transportation (pallets, shrink films, or the like) are subject to these standards, excluding the following:

- The 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
- The packaging and packing materials that are 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 to be 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 those 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 those 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. The TOTO Group continuously monitors its content in products and strives to reduce its environmental impact by reducing or substituting it 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 to 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 for the purpose of improvement of performance, functions, appearance, or quality. Furthermore, this includes the condition where substances are used in manufacturing processes or others and 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, which are used in product manufacturing processes, and the ones, 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 “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 whose use is 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 TOTO group and parts constituting the products.
- Not contain more than regulated value regardless of intentional or unintentional addition. (If substances applying the regulated value)

For the subject substances and legal regulated values for content, refer to “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	<ul style="list-style-type: none">- 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- Minamata Convention on Mercury

	<ul style="list-style-type: none"> - 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)
Japan	<ul style="list-style-type: none"> - 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"> Class 1 specified chemical substances (Substances prohibited to be manufactured and imported) - 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"> Specific substances - Article 55 of the Industrial Safety and Health Act (hereinafter referred to as “Safety and Health Act”) <ul style="list-style-type: none"> Hazardous substances prohibited to be manufactured - Building Standards Act <ul style="list-style-type: none"> Prohibited substances - Poisonous and Deleterious Substances Control Act (Poisonous and Deleterious Act) - Act on the Control of Household Products Containing Harmful Substances (Household Products Control Act)
EU	<ul style="list-style-type: none"> - The POPs Regulation <ul style="list-style-type: none"> Annex I (Prohibited substances), Annex II (Restricted substances), and Annex III (Reduced substances) - Regulation on substances that deplete the ozone layer - Regulations on Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH regulation) <ul style="list-style-type: none"> Annex XVII (Restricted substances)
United States	<ul style="list-style-type: none"> - Taxes on Ozone-Depleting Chemicals - Title VI of the Clean Air Act: Stratospheric Ozone Protection - Toxic Substances Control Act (TSCA)

2) Restricted substances

According to international treaties, laws and regulations, substances whose use is prohibited or whose use is 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

For the substances to be monitored, the TOTO Group not only manages the information on the inclusion of such substances in the materials, parts and other components that are delivered to the TOTO Group and their safety data sheet (SDS) but also monitors and manages them based on the established operation standards according to legal requirements so that the actions are taken to meet the requirements of laws and regulations.

Although the inclusion of such substances in the materials, parts and other components that are delivered to the TOTO Group is not restricted at present, they are suspected to have a negative impact on human health and environment.

Therefore, reducing use and replacing with substitutes are recommended in the future, and the information on inclusion needs to be grasped and reported in accordance with the stipulations in laws, regulations, and so on.

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 among the subject substances, refer to the list provided on the website of European Chemicals Agency (ECHA) (updated in around January and July every year).

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

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

The provision of the information on the inclusion of other subject substances will be requested from the TOTO Group when needed.

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

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

4) Materials conforming to the standards on the emission of formaldehyde and 4 VOCs

The wooden building materials and so on constituting the products that the TOTO Group sells in Japan shall be the materials conforming to the standards on the emission of formaldehyde and 4 volatile organic compounds (VOCs) defined in “3.Definitions” of this standard. The TOTO Group has the operation standards for formaldehyde F☆☆☆☆ and 4 VOCs (toluene, xylene, ethylbenzene, and styrene) respectively. For the concepts of measures against formaldehyde and 4 VOCs based on spaces, parts, and materials, the

building materials subject to notification, and the building materials subject to indication of 4 VOCs, refer to “List of Prohibited and Restricted Substances: Attached Table 4” that is attached separately.

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, regulated value or exemptions are changed, suppliers are requested to re-submit the non-use guarantee.

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

- To ensure that these standards are continually complied with and 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 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 as the documents showing that the content of a prohibited or restricted substance in the delivered products does not exceed the regulation value or the requirements of laws, regulations, and other requirements are satisfied. If requested from the TOTO Group, 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"> Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Form 1, Type A)
Restricted substance	Products subject to EU RoHS directive	Restriction of inclusion	<ul style="list-style-type: none"> Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Form 1, Type B) List of materials constituting products Component analysis table (Analysis data) <p>*Any format can be acceptable for “list of materials constituting products” and “component analysis table (analysis data)”.</p>
	Products that are not subject to EU RoHS directive, among the products sold in the EU region	Restriction of inclusion	<ul style="list-style-type: none"> Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Form 1, Type C)

	Products subject to EU directive on packaging materials	Restriction of inclusion	<ul style="list-style-type: none"> Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Form 1, Type D) List of materials constituting products Component analysis table (Analysis data) <p>* Any format can be acceptable for “list of materials constituting products” and “component analysis table (analysis data)”.</p>
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"> The concentration and content shall be reported <p>*No template (Using a tool such as chemSHERPA is recommended)</p>
	Substances required by other individual laws, regulations, and so on	Specified in individual written requests	<ul style="list-style-type: none"> The requested matters and documents to be submitted are notified at each request
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><Formaldehyde F☆☆☆☆></p> <ul style="list-style-type: none"> Application for conformance to formaldehyde F☆☆☆☆ A document certifying that the formaldehyde emission is at the target value or lower <p><4 VOCs></p> <ul style="list-style-type: none"> Application for conformance to the 4 VOCs standards A document certifying that the emissions of 4 VOCs are at the target values or lower

4) Provision of the information on chemicals in products

In order to manage and assure the chemicals in products in a reliable manner, it is necessary to collect and maintain the accurate information on chemicals in products throughout the supply chain.

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

If the submission of documents, such as non-use guarantee and investigation reports, is requested from the TOTO Group, your cooperation in submitting immediately is appreciated.

5) Change Management

When any change arises to be made to the processes and materials for the delivered products to the TOTO Group that vary or influence the management of chemicals in products, as well as their components, it is necessary to submit a request for examination of change and to obtain approval on the change in advance.

It may also be requested to re-submit the information on chemical substances contained, if needed for examining the change.

In addition, in the event of a change to our requirements as shown below, it may be requested to re-investigate the information on chemical substances contained in all or specific delivered products and re-submit the result, if 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 homogenous 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 (Products subject to EU RoHS directive)
Form 1 Type C	Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Products that are not subject to EU RoHS directive, among the products sold in the EU region)
Form 1 Type D	Guarantee of Non-Use of Prohibited Substances & Restricted Substances (Products subject to EU directive on packaging materials)
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)

7. Revision History

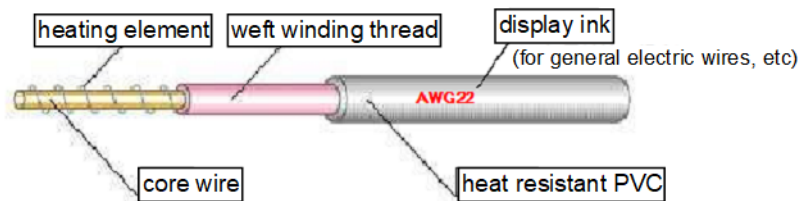
Establishment: April 2010

Year and month of revision	Version No.	Details of revision
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)

<Reference 1 Examples of homogenous materials>

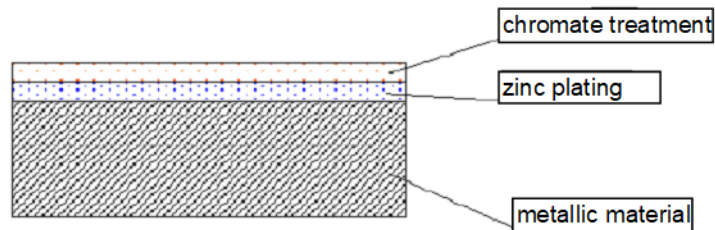
[Case 1] Heater wire

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



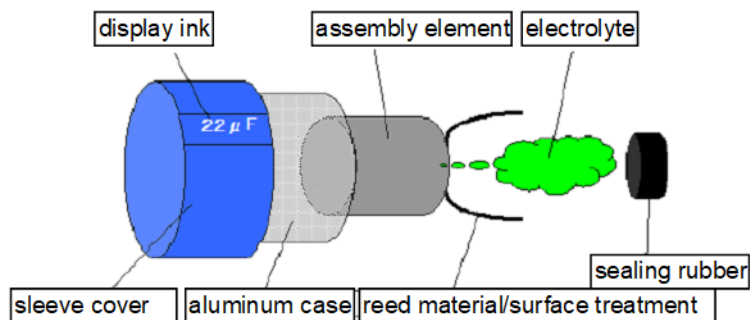
[Case 2] Plating on metal materials

Component parts: metallic material, zinc plating, chromate treatment

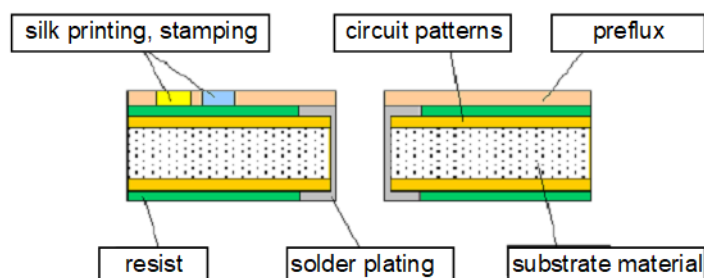


[Case 3] Aluminum electrolytic capacitor

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



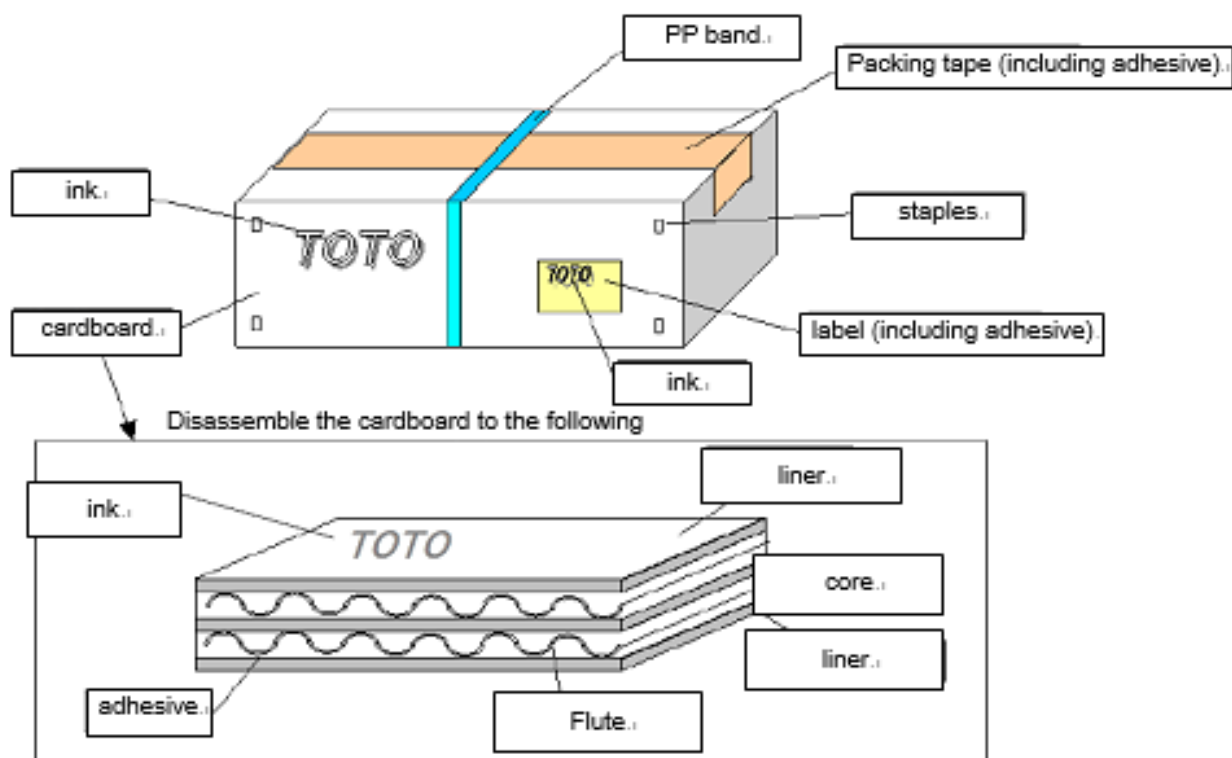
[Case 4] Printed circuit board



<Reference 2 Examples of packing material units >

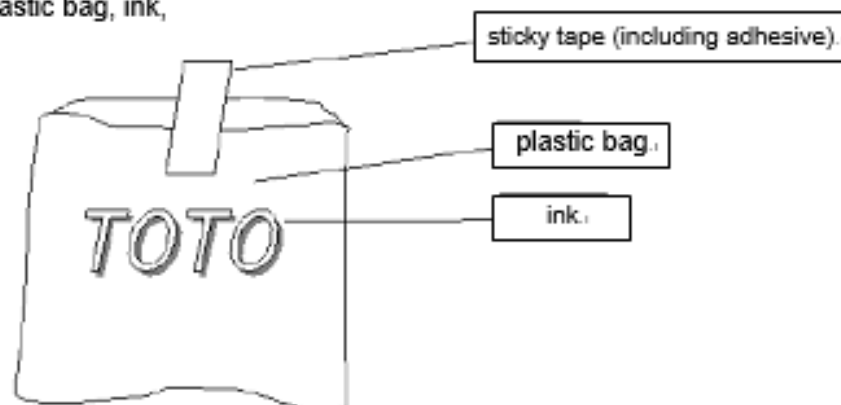
[Case 1] Around the outer box.

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



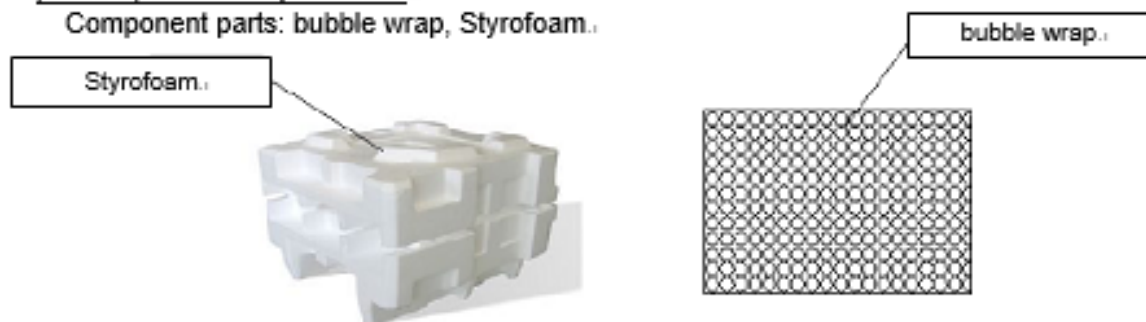
[Case 2] Plastic Bags.

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

Ver.03(2021/4/1 revised)

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

Type	Corporate Seal
A : Group I (No need to write "List of Delivered Parts Subject to Guarantee of Non-Use of Restricted Substances")	Company Name:
B : Group I + II + III + IV (Products Subject to RoHS Directive)	Address:
C : Group I + IV (Products Not Subject to RoHS Directive)	Responsible Person:
D : Group I + II + IV (Products Subject to Packaging Material Directive)	
E : Group I + II + III (Products Subject to RoHS in each country)	

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 (Table 1)

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)
	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)
	18	1,4-Benzenediamine, N,N'-bis(methylphenyl)-	46	Short chain chlorinated paraffins (C10-13)(SCCPs)
	19	Phenol, 2,4,6-tris(1,1-dimethylethyl)-	47	Decabromodiphenyl ether(decaBDE)
	20	Toxaphene	48	Perfluorooctanoic acid(PFOA), its salts
	21	dodecachloropentacyclo[5.2.1.02,6.03,9.05,8]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 it's salts*	54	Polychlorinated dibenzo-p-dioxins(PCDDs)
	27	2-Naphthalenamine and it's salts*	55	Polychlorinated dibenzofurans(PCDFs)
	28	4-nitrobiphenyl and it's salts*	56	Mercury and mercury compounds
			57	Hydrochlorofluorocarbon (HCFC)

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 •REACH ANNEX17(Entry51)	RoHS:<1000ppm
	6	PBDEs (polybromodiphenyl ether) *		RoHS:<1000ppm
	7	Bis (2-ethylhexyl) phthalate (DEHP) *		RoHS:<1000ppm
	8	Butyl benzyl phthalate (BBP) *		RoHS:<1000ppm
IV	9	Dibutyl phthalate (DBP) *	•REACH ANNEX17	RoHS:<1000ppm
	10	Diisobutyl phthalate (DIBP) *		RoHS:<1000ppm
	13	Azo dye that generates some aromatic amines *		<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) *		<100ppm
	18	Diocetyl tin compound (DOT) *		<1000ppm
	19	Trisubstituted organotin compound *		<1000ppm
	20	Dimethyl fumarate (DMF) *		<0.1ppm
	21	Polycyclic aromatic hydrocarbon (PAH) *		<1ppm
	22	Phenyl mercury *		<100ppm

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

Ver.03(2021/4/1 revised)

Our company shall submit Type		C	Guarantee.
Type			Corporate Seal
A : Group I (No need to write "List of Delivered Parts Subject to Guarantee of Non-Use of Restricted Substances") B : Group I + II + III + IV (Products Subject to RoHS Directive) C : Group I + IV (Products Not Subject to RoHS Directive) D : Group I + II + IV (Products Subject to Packaging Material Directive) E : Group I + II + III (Products Subject to RoHS in each country)			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 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 (Table1)

Group	No	Substance Name or Substance Group Name	No	Substance Name or Substance Group Name
I	1	Chlorofluorocarbon(CFC) (Table1-2)	29	[1,1'-Biphenyl]-4,4'-diamine and it's salts* (Cas.92-87-5)
	2	halon (Table1-2)	30	Phosphorothioic acid, O,O-diethyl O-(3,5,6-trichloro-2-pyridinyl) (Cas.2921-88-2)
	3	Methane, tetrachloro- (Cas.56-23-5)	31	Perfluorooctanesulfonic Acid (Table1-2)
	4	Ethane, 1,1,1-trichloro- (Cas.71-55-6)	32	Perfluoro-n-octanesulfonyl Fluoride (Table1-2)
	5	Hydrobromofluorocarbon(HBFC) (Table1-2)	33	Pentachlorobenzene (Cas.608-93-5)
	6	Methane, bromochloro- (Cas.74-97-5)	34	alpha-Hexachlorocyclohexane (Cas.319-84-6)
	7	Methane, bromo- (Cas.74-83-9)	35	beta-Hexachlorocyclohexane (Cas.319-85-7)
	8	Asbestos* (Table1-2)	36	gamma-Hexachlorocyclohexane (Cas.58-89-9)
	9	Polychlorinated biphenyls (PCB) (Table1-2)	37	Chlordecone (Kepone) (Cas.143-50-0)
	10	Polychlorinated naphthalenes (PCN) (Table1-2)	38	Polybrominated Biphenyls (PBBs) (Table1-2)
	11	Benzene, hexachloro- (Cas.118-74-1)	39	Tetrabromodiphenyl ether (Cas.40088-47-9, 5436-43-1)
	12	aldrin (Cas.309-00-2)	40	Pentabromodiphenyl ether (Cas.32534-81-9, 60348-60-9)
	13	dieldrin (Cas.60-57-1)	41	Hexabromodiphenyl ether (Cas.36483-60-0, 68631-49-2, 207122-15-4)
	14	endrin (Cas.72-20-8)	42	Heptabromodiphenyl ether (Cas.68928-80-3, 207122-16-5, 446255-22-7)
	15	Dichloro Diphenyl Trichloroethane (DDT) (Cas.50-29-3)	43	Endosulfan (Benzoepin) (Table1-2)
	16	Chlordane, pur (Table1-2)	44	Hexabromocyclododecane(HBCD) (Table1-2)
	17	Tributyl tin compounds (Table1-2)	45	Pentachlorophenol(PCP) (Table1-2)
	18	1,4-Benzenediamine, N,N'-bis(methylphenyl)- (Table1-2)	46	Short chain chlorinated paraffins (C10-13)(SCCPs) (Table1-2)
	19	Phenol, 2,4,6-tris(1,1-dimethylethyl)- (Cas.732-26-3)	47	Decabromodiphenyl ether(decaBDE) (Cas.1163-19-5)
	20	Toxaphene (Cas.8001-35-2)	48	Perfluorooctanoic acid(PFOA), its salts (Table1-2)
	21	dodecachloropentacyclo[5.2.1.02.6.03.9.05.8]decane (Cas.2385-85-5)	49	PFOA-related compounds (Table1-2)
	22	dicofof (Cas.115-32-2, 10606-46-9)	50	Polychlorinated Terphenyls (PCTs)* (Cas.61788-33-8)
	23	1,3-Butadiene, 1,1,2,3,4,4-hexachloro- (Cas.87-68-3)	51	Tetraethyl lead (Cas.78-00-2)
	24	Phenol, 2-(2H-benzotriazol-2-yl)-4,6-bis(1,1-dimethylethyl)- (Cas.3846-71-7)	52	Tetramethyl lead (Cas. 75-74-1)
	25	Methane, oxybis(chloro)-* (Cas.542-88-1)	53	Tris(2,3 dibromopropyl)phosphate (Cas.126-72-7)
	26	Biphenyl-4-ylamine and it's salts* (Cas.92-67-1)	54	Polychlorinated dibenzo-p-dioxins(PCDDs) (Cas.1746-01-6)
	27	2-Naphthalenamine and it's salts* (Cas.91-59-8)	55	Polychlorinated dibenzofurans(PCDFs) (Cas.51207-31-9)
	28	4-nitrobiphenyl and it's salts* (Cas.92-93-3)	56	Mercury and mercury compounds (Cas.7439-97-6)
			57	Hydrochlorofluorocarbon (HCFC) (Table1-2)

Restricted substances (Refer to Table2 for details of substances)

Group	No	Substance Name or Substance Group Name	laws and regulations	Regulation Value
IV	7	Bis (2-ethylhexyl) phthalate (DEHP) *	• REACH ANNEX17(Entry51)	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) *		
IV	13	Azo dye that generates some aromatic amines *	• REACH ANNEX17	<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) *		<1000ppm
	18	Diocetyl tin compound (DOT) *		<1000ppm
	19	Trisubstituted organotin compound *		<0.1ppm
	20	Dimethyl fumarate (DMF) *		<1ppm
	21	Polycyclic aromatic hydrocarbon (PAH) *		<100ppm
	22	Phenyl mercury *		<100ppm

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

Ver.03(2021/4/1 revised)

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

Corporate Seal

A : Group I (No need to write "List of Delivered Parts Subject to Guarantee of Non-Use of Restricted Substances")
B : Group I + II + III + IV (Products Subject to RoHS Directive)
C : Group I + IV (Products Not Subject to RoHS Directive)
D : Group I + II + IV (Products Subject to Packaging Material Directive)
E : Group I + II + III (Products Subject to RoHS in each country)

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 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 (Table1)

Group	No	Substance Name or Substance Group Name	No	Substance Name or Substance Group Name
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	2	halon (Table1-2)	30	Phosphorothioic acid, O,O-diethyl O-(3,5,6-trichloro-2-pyridinyl) (Cas.2921-88-2)
	3	Methane, tetrachloro- (Cas.56-23-5)	31	Perfluorooctanesulfonic Acid (Table1-2)
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	13	dieldrin (Cas.60-57-1)	41	Hexabromodiphenyl ether (Cas.36483-60-0, 68631-49-2, 207122-15-4)
	14	endrin (Cas.72-20-8)	42	Heptabromodiphenyl ether (Cas.68928-80-3, 207122-16-5, 446255-22-7)
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	19	Phenol, 2,4,6-tris(1,1-dimethylethyl)- (Cas.732-26-3)	47	Decabromodiphenyl ether(decaBDE) (Cas.1163-19-5)
	20	Toxaphene (Cas.8001-35-2)	48	Perfluorooctanoic acid(PFOA), its salts (Table1-2)
	21	dodecachloropentacyclo[5.2.1.0.2.6.0.3.9.0.5.8]decane (Cas.2385-85-5)	49	PFOA-related compounds (Table1-2)
	22	dicofof (Cas.115-32-2, 10606-46-9)	50	Polychlorinated Terphenyls (PCTs)* (Cas.61788-33-8)
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	28	4-nitrobiphenyl and its salts* (Cas.92-93-3)	56	Mercury and mercury compounds (Cas.7439-97-6)
			57	Hydrochlorofluorocarbon (HCFC) (Table1-2)

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 *		Total values of heavy metals of 1 to 4 are less than 100 ppm.
	2	Lead and its compounds *		
	3	Cadmium and its compounds *	* Packaging materials	
	4	Hexavalent chromium compounds *		
			* REACH ANNEX II (2006/67/EC)	Less than 1000ppm with one of No. 1 to 10 or any combination.
IV	13	Azo dye that generates some aromatic amines *		<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) *	* REACH ANNEX I7	<1000ppm
	18	Diethyltin compound (DET) *		<1000ppm
	19	Trisubstituted organotin compound *		<1000ppm
	20	Dimethyl fumarate (DMF) *		<0.1ppm
	21	Polycyclic aromatic hydrocarbon (PAH) *		<1ppm
	22	Phenyl mercury *		<100ppm

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.).

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