It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
1.1 As our environmental vision, HARBOR PACKAGING, INC. Incorporated recognized that the protection of the earth’s environment is one of the most important subjects of mankind, and shall positively contribute to the realization of the preservation of the earth’s environment and to the realization that our society can support the dreams of future generations.

2.0 ENVIRONMENTAL POLICY:

2.1 HARBOR PACKAGING, INC. shall:

2.1.1 Make every effort to improve our environment by reducing consumption, along with more efficient use of materials and resources.

2.1.2 Observe laws and regulations, customer requirements and other requirements as well, in order to carry out the protection of the environment.

2.1.3 Implement environmental audits and management review of all environmental related matters to help in improving environmental performance.

2.1.4 Strive to continually improve our environmental performance.

2.2 This Environmental Policy and Procedures Manual lists all documents required to fulfill our goals.

3.0 ENVIRONMENTAL POLICY REVIEW:

3.1 Harbor Packaging, Inc. environmental program shall be annually reviewed as a minimum requirements by our Environmental Program Management Review Committee.

3.2 The (EPMRC) Environmental Program Management Review Committee shall consist of the General Manager, Environmental Program Representative, Sales and Marketing Manager and Materials and Purchasing Manager.

3.3 The Environmental Program Management Representative shall issue Policy Review meeting minutes to the EPMRC.

4.0 REFERENCE DOCUMENTS:

4.1 SS-00259 MANAGEMENT REGULATIONS FOR ENVIRONMENT RELATED SUBSTANCES to be controlled which are included in parts and materials

<table>
<thead>
<tr>
<th>Signature:</th>
<th>Date:</th>
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<tbody>
<tr>
<td>Harbor Packaging, Inc. President</td>
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ORIGINATOR (S) / AUTHOR (S): Jeannette Calzada-Sebastiano

APPROVALS

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<tr>
<td>President</td>
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<td>Purchasing Manager</td>
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<td>EMS Representative</td>
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REVISION STATUS HISTORY

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<th>REVISION</th>
<th>DESCRIPTION OF CHANGE</th>
<th>EFFECTIVE DATE</th>
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<tr>
<td>Initial Release</td>
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DISTRIBUTION LOCATIONS

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It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
1.0 PURPOSE:

1.1 The purpose of this requirement regarding environment quality assurance is for Harbor Packaging, Inc., contracted suppliers and SONY Corporation to include its subsidiary companies, to furnish them with raw materials and parts, which conform to the specifications, technical standard and supplier technical drawings.

2.0 SCOPE:

2.1 Compliance with environmental requirements of:

SS-00259 “Management Regulations for Environment Related Substances
to be controlled which are included in parts and materials

2.2 Applies to Harbor Packaging, Inc as a Manufacturer and supplier pursuant to delivery of packaging materials to SONY Corporation. Suppliers include the suppliers of parts and the agencies who do not deliver materials and parts directly to SONY Corporation.

3.0 REFERENCE DOCUMENTS:

3.1 SS-00259 MANAGEMENT REGULATIONS FOR ENVIRONMENT RELATED SUBSTANCES
to be controlled which are included in parts and materials

4.0 DEFINITIONS:

4.1 EMS: Environmental Management System

5.0 RESPONSIBILITY:

5.1 **EMS Representative**: Shall exercise responsibility and authority for establishing and maintaining the EMS, conducting training and awareness, internal and external information management, operational control, auditing and reporting on the performance of the EMS, scheduling and chairing EPMRC Review meetings and Management Review meetings in addition to SONY Corporation as required. Provides follow-up and implementation on relevant actions agreed upon.

5.2 **President**: Shall authorize or delegate personnel to EMS program responsibilities. Ensures compliance to the EMS and to the internal audit process.

5.3 **Environmental Program Management Review Committee**: EPMRC Appointed committee members shall meet at least once a year for a comprehensive review with documentation of the EMS to ensure its continuing, stability, adequacy and effectiveness. The EMS Representative is responsible for scheduling and chairing the meeting. Meeting Review Minutes shall be published and distributed to the EPMRC and management.

5.4 **HPI employees**: This procedure applies to all personnel participating in the Environmental Management System

6.0 POLICY REQUIREMENTS:

6.1 Establish and maintain an Environmental Management System

*It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.*
6.1.1 Establish the purpose and aim on environmental related substances governed by SS-00259 and regulations.

6.1.2 Set environmental objectives and goals.

6.1.3 Establish and provide employee training and awareness on the Environmental Program.

6.1.4 Establish an EPMRC Environmental Management Review Committee.

6.1.5 HPI President shall appoint an EMS Representative.

6.1.2.1 Identify the role, responsibility and authority of the EMS Representative.

6.2 EMS Representative:

6.2.1 Shall build a structure of environmental management system.

6.2.2 Carry out all the work, exercise authority in dealing with the regulations of environmental related substances.

6.2.3 Prepare and use specified standard forms which conform to SS-00259 and regulations.

6.2.4 Verify documentation submitted from suppliers on submission of parts/materials to be authorized.

6.2.5 Establish a central document repository for the specified standard forms which conform to SS-00259 and regulations.

6.3 Maintenance and improvement of the Environmental Management System:

6.3.1 Establish abolition and reduction plans to prohibit Level I and Level II substances which are regulated by SS-00259 within the fixed term.

6.3.2 HPI managers shall ensure that progress checks and internal audits are carried out.

6.3.3 Establish internal auditing rules for internal operations to include the appointment of internal operators.

6.3.4 Prepare an Audit Plan.

6.3.5 Enforce the Internal Auditing Plan to include management review, correction and prevention activities of non-conformities.

6.4 Information Management:

6.4.1 HPI Managers shall establish an internal transfer system of environmental information from SONY Corporation.

6.4.2 Information on current regulations shall be promptly forwarded to each department (as applicable to the internal document controlled distribution).

6.4.3 Ensure clear communication and application of all regulations.

6.5 Management of subcontract factories:

6.5.1 This policy applies directly to subcontract factories in the control of environment related substances.

6.5.2 This policy of Environment related management shall be confirmed.

6.6 Non-conformities:

6.6.1 HPI has established protocol, escalation and internal communication path for immediate notification whenever material or parts non-conformity occurs with regard to environment related substances.

6.6.2 This includes the processing, segregation and quarantine of parts/raw materials concerned or under investigation.

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6.6.3 Processes include reporting, corrective action, effective countermeasure, verification, checking results and documentation of the incident.

6.6.4 Immediate notification to SONY Corporation as necessary.

6.7 Purchasing Management of Materials:

6.7.1 HPI has established documented procedures with regard to environment related substances.

6.7.2 Procedures include required standards and forms, responsibilities, rules and protocol to be carried out with regard to suppliers of raw materials and parts.

6.7.3 Procedure include the verification and confirmation of certificates and testing data on environment related substances.

6.7.3 Ensure suppliers are notified of all environmental specifications, as well as instructions on the prohibited use of Level I substances.

6.8 Incoming Acceptance Quality Control:

6.8.1 HPI Management has established deliver inspection, verification and confirmation methods of content/contents documents (Purchase Orders, Invoices and or Certificates) of raw materials/parts for environment related substances in the deliver/receiving/incoming Warehouse operations.

6.8.2 Warehouse operations shall include a verification of process history before delivery to prevent mixing of environment related substances.

6.8.3 Immediately notify the EMS Representative and the Purchasing agent of non-conformities.

6.8.4 Maintain records of all raw material/part non-conformities.

6.9 Quarantine Prevention processes:

6.9.1 HPI Management has established quarantine and tagging processes for proper identification of content/contents of raw materials/parts in the receiving/incoming Warehouse operations.

6.9.2 Ensure prompt execution of quarantine and prevention of mixing/pollution in process of prohibited substances.

6.10 Stock Control:

6.10.1 Ensure discrimination control of stock of non-conformance raw materials/parts.

6.10.2 Ensure placement of a QUARANTINE TAG on rejected lots.

6.10.3 Ensure prevention of inclusion of rejected lots with accepted lots.

6.10.4 Ensure Certificates on NON-USE of Environment related substances are:

1. Visible on accepted lots or stock.
2. Attached to accepted lots or stock.
3. Copies of the storage measured data provided to the EMS Representative.

6.11 LOT/Stock traceability:

6.11.1 Establish LOT/stock tracing of environmental related substances.

6.11.2 Establish a method for LOT/stock management for incoming delivery and shipment of raw materials/parts.

It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
6.12 Process Controls:

6.12.1 HPI requires suppliers to submit Change Management documentation related to changes in raw materials, formulas, equipment and or manufacturing processes as they occur.

6.12.1 A determination shall be made if new sample parts ICP measurement data is required and Follow-up to ensure all required testing is completed.

6.12.2 Report to SONY Corporation all incidence of Change Management to include submission of required forms and documentation.

6.13 Internal Audits:

6.13.1 Establish an Internal Audit Plan auditing environment related quality.
6.13.2 The EMS Representative shall establish an audit plan.

6.13.2.1 The audit shall be carried out as established by the Internal Audit Procedure.

6.13.2.2 Internal audits serve to continually improve communications, maintenance and improvement of the environmental management system.
It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
2.0 SCOPE:

2.1 Defines all documents required for the effective operation of the Environmental Management System and includes:
2.1.1 LEVEL I - EMS POLICIES
2.2.2 LEVEL II - EMS STANDARD OPERATING PROCEDURES
2.2.3 LEVEL III - EMS FLOWCHARTS, WORK INSTRUCTIONS
2.2.4 LEVEL IV - EMS STANDARD FORMS AND DOCUMENTS

3.0 REFERENCES:

3.1 SS-00259 MANAGEMENT REGULATIONS FOR ENVIRONMENT RELATED SUBSTANCES to be controlled which are included in parts and materials

4.0 DEFINITIONS:

4.1 EMS: Environmental Management System

5.0 RESPONSIBILITIES:

5.1 EMS Representative: Shall exercise responsibility and authority for establishing and maintaining the EMS, conducting training and awareness, internal and external information management, operational control, auditing and reporting on the performance of the EMS, scheduling and chairing EPMRC Review meetings and Management Review meetings in addition to SONY Corporation as required. Provides follow-up and implementation on relevant actions agreed upon.

5.2 President: Shall authorize or delegate personnel to EMS program responsibilities. Ensures compliance to the EMS and to the internal audit process.

5.3 Environmental Program Management Review Committee: EPMRC Appointed committee members shall meet at least once a year for a comprehensive review with documentation of the EMS to ensure its continuing, stability, adequacy and effectiveness. The EMS Representative is responsible for scheduling and chairing the meeting. Meeting Review Minutes shall be published and distributed to the EPMRC and management.

HPI employees: This procedure applies to all personnel participating in the Environmental Management System

It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
6.0 PROCEDURE:

6.1 General Document Control processes:

6.1.1 Applies to all levels of documents required for the effective operation of the EMS.

<table>
<thead>
<tr>
<th>Document Level</th>
<th>Policy Documents and Standard Operating Procedure</th>
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<tbody>
<tr>
<td>Level I</td>
<td>Documentation that defines and executes the overall policy for the Company’s EMS.</td>
</tr>
<tr>
<td>Level II</td>
<td>Documentation for all HPI processes maintained in the form of the EMS Manual These documents define the overall process and the basic responsibilities related to EMS Standard Operating Procedures.</td>
</tr>
<tr>
<td>Level III</td>
<td>Documents which provide “How to” information. These documents are departmental Procedures, Flowcharts and Operating Work Instructions, respectively</td>
</tr>
<tr>
<td>Level IV</td>
<td>Maintained as records and reports. Consists of forms (hardcopy and or electronic), tags, labels, or other controlled documents that become quality record.</td>
</tr>
</tbody>
</table>

6.1.2 All documents shall be legible, revision controlled, traceable to the product (as applicable), and maintained in orderly files and readily accessible.

6.2 Document and data approval:

6.2.1 All documents are reviewed with the relating department managers and the EMS Representative for approval.

6.2.2 Changes and Revisions to controlled documents are reviewed and approved by the functions responsible, ascertaining, general knowledge of the subject matter and pertinent background information upon which to base their review. The nature of the change shall be identified, and or referenced on the documents and appropriate attachments.

6.2.3 Approved documents are identified with authorized personnel approval signatures on the document.

6.3 Distribution:

6.3.1 Distribution of EMS documents are to be controlled.

6.3.2 Identification of Controlled/Uncontrolled Documents:

6.3.2.1 All Documents are categorized as a “CONTROLLED DOCUMENT”, or “Uncontrolled” as “REFERENCE ONLY.”

- a) Controlled copies are stamped “CONTROLLED” document in red ink.
- b) Uncontrolled copies are watermarked with Uncontrolled Copy across face of document.
- c) Employees can print uncontrolled copies for a specific one time use and purpose.
- d) Unofficial reproduction of controlled documents shall be confiscated and shredded.
- e) Uncontrolled “REFERENCE ONLY” copies may be used for submission to suppliers.

*It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.*
customers, regulatory agencies, registrars and other external sources as deemed necessary.

f) All pages of published HPI EMS documents shall include the following italicized statement in the document footer:

“It is the responsibility of the user to ensure that the most recent revision of this document is available prior to use”

6.3.3 Current issues of documentation are available at specified distribution locations for their intended use.

6.3.4 EMS Representative shall:

6.3.4.1 Maintain a master list of all EMS documents indicating the current revision level status.

6.3.4.2 Ensure proper distribution upon release and implementation of approved documents.

6.3.4.3 Ensure all obsolete documents are removed from distribution locations prior to the release of the revised document.

a) Obsolete controlled documents are promptly removed from all distribution locations to prevent unintended use and stamped in red ink “OBSOLETE” for proper identification and retention for any purpose.

b) An original copy of the obsolete document is maintained as a part of the EMS Document Control records.

6.3.4.4 Current revisions are not released unless obsolete documents are retrieved.

It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
1.0 PURPOSE:

To describe processes for selection and supplier/subcontractor approval, purchasing documents are reviewed and verification of purchased products are conducted.

2.0 SCOPE:

2.1 The selection and use of suppliers/subcontractors, the level of assessment and the degree of control exercised are dependent upon: the product purchased, assessment results, and supplier/subcontractor performance.

2.2 Supplier/subcontractor performance is monitored.

2.3 Corrective action is required to improve performance.

2.4 The supplier/subcontractor is notified for each incidence of non-conformance and where applicable, failure to take appropriate corrective action shall result in discontinued use of the supplier/subcontractor’s product.

3.0 REFERENCES:

3.1 SS-00259  SONY TECHNICAL STANDARD MANAGEMENT REGULATIONS FOR ENVIRONMENT RELATED SUBSTANCES to be controlled which are included in parts and materials

3.2 SONY “Guidance on environment related Quality Assurance”

3.3 Certificate of Non-Use of Hazardous Substances for Parts Inspection Approval [FORM]

3.4 Certificate of Non-Use of Hazardous Substances for Mass Production [FORM]

3.5 Certificate of Non-Use - Instructions for proper documentation

4.0 DEFINITIONS:

4.1 EMS: Environmental Management System

5.0 RESPONSIBILITIES:

5.1 EMS Representative: Shall exercise responsibility and authority for establishing and maintaining the EMS, conducting training and awareness, internal and external information management, operational control, auditing and reporting on the performance of the EMS, scheduling and chairing EPMRC Review meetings and Management Review meetings in addition to SONY Corporation as required. Provides follow-up and implementation on relevant actions agreed upon.

5.2 President: Shall authorize or delegate personnel to EMS program responsibilities. Ensures compliance to the EMS and to the internal audit process.

5.3 Environmental Program Management Review Committee: EPMRC Appointed committee members shall meet at least once a year for a comprehensive review with documentation of the EMS to ensure its continuing, stability, adequacy and effectiveness. The EMS Representative is responsible for scheduling and chairing the meeting. Meeting Review Minutes shall be published and distributed to the EPMRC and management.

HPI employees: This procedure applies to all personnel participating in the Environmental Management System.

It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
6.0 **PROCEDURE:**

6.1 Evaluation of suppliers/subcontractors:

6.1.1 HPI assesses its suppliers/subcontractors and purchases only from those that satisfy company’s EMS Requirements in compliance with SONY Technical Standard SS-00259.

6.1.2 Suppliers and subcontractors are assessed on their ability to comply with the company’s product specifications and EMS program requirements.

6.1.3 Evaluations of each vendor’s performance history shall be documented in Vendor Non-conformity reports.

6.1.4 Recommendations or disqualifications for supplier and subcontractors shall be submitted to the President and EMS Representative for final approval.

6.1.5 Approved suppliers/subcontractors are qualified on the basis of having the capabilities to improve quality, deliver and cost.

6.1.6 Supplier/subcontractor evaluations, and assessments shall be properly documented to support all activities.

6.1.7 Approved suppliers/subcontractors are listed on the *Approved Vendor/Subcontractor List*.

   6.1.7.1 Supplier/subcontractor approval is required prior to use for HPI distribution services.

   6.1.7.2 Suppliers/subcontractors shall require the submission of a Certificate of Non-Use of Hazardous Substances as required by SS-00259.

      a) ICP measured data may be required as verification of Level I Hazardous Substances.

      b) MSDS may be required as verification of chemical composition, compounds and substances.

6.2 Selection of new suppliers/subcontractors:

6.2.1 Criteria:

   6.2.1.1 Suppliers/subcontractors shall establish and maintain the same EMS as required for Green Partner Certification.

   6.2.1.2 Suppliers/subcontractors have established an EMS prohibiting the use of Level I and Level II substances as required by SS-00259.

   6.2.1.3 Suppliers have satisfactorily “passed” the criteria for SONY Green Partner Audit.

6.3 Control of Subcontract factories:

6.3.1 HPI shall ensure subcontractors have an established EMS, to ensure that parts manufactured in cooperating factories are managed for environment related materials.

6.3.2 Ensure compliance with SONY’s “Guidance on environment related Quality Assurance”.

6.3.3 Conduct audits on subcontractor (companies) to include secondary and tertiary suppliers to ensure that

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The EMS Quality assurance is equally managed and maintained.

6.3.4 Document and maintain records on file on each incidence on non-conformance and corrective actions to prevent reoccurrence.

6.3.5 Periodically audit, (annually as the minimum criteria) to maintain and manage the EMS.

6.4 Purchasing documents:

6.4.1 Purchasing documents clearly and completely describe ordered products, including regulatory requirements as required by Sony Technical Standard SS-00259.

6.4.2 Purchase Orders shall include the following statement for verification, validation purposes:

| The Part Number on this P.O. does not contain cadmium or cadmium compounds as required by Sony Technical Standard SS-00259. |

6.5 Design standards and specifications:

6.5.1 Suppliers of raw materials and parts shall document the prohibition of Level I Cadmium and Cadmium Substances on all design standards and specifications.

6.5.2 As proof that no Level I substances are contained in newly selected raw materials and parts, ICP measured data or MSDS chemical composition/ingredients list shall be obtained and verified as acceptable.

Certificate of non-use of The Controlled Substances FORM

It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
Certificate of non-use of environment-related substances
(for approval/authorization)

To: Messrs. Sony Corporation

Supplier code: ________________________________
Company name ______________________________
Responsible person name: _____________________

We hereby certify that any material of which use is prohibited by Sony's requirement (SS-00259) is not contained in the materials used for parts and unit parts to be sold to your company, packing materials, and additives in the manufacturing process. Regarding the parts and unit parts, packing materials, and additives in the manufacturing process, we notify that they are made up of the following ingredients.

(1) Unit parts/parts
Part name: ________________________________ Part No.: ________________________________
SB No.: ________________________________ Production plant: ________________________________

<Materials used>
1. Portion: ( )
   Raw material manufacturer name ( )
   Material name/type name ( )
2. Portion: ( )
   Raw material manufacturer name ( )
   Material name/type name ( )

<Additives used>
1. Purpose of use: ( )
   Raw material manufacturer name ( )
   Material name/type name ( )
2. Purpose of use: ( )
   Raw material manufacturer name ( )
   Material name/type name ( )

(2) The data on ICP-AES data about measurable substances is shown in the attached sheet.

(3) The data on ingredient analysis of immeasurable materials is shown in the attached sheet.
* If all the data cannot be entered in the corresponding space, describe it in a separate sheet.

Remarks:

Certificate of non-use of The Controlled Substances FORM

Page 5 of 9

It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
Date:

Certificate of non-use of The Controlled Substances
(for mass production parts)
[ The fiscal year of ]

Company name:
Division name:

Supplier code:
Company name
Responsible person name: (seal)
e-mail:

1. This is to certify that the substances of which use is controlled by Sony (SS-00259) as management level 1 (whose use is prohibited) are not used for the parts/auxiliary materials, the materials of the unit parts, the package materials, and additives in the production process, etc. to be delivered to Sony Corporation.

2. The parts/auxiliary materials, and the unit parts delivered are as follows:
Contents: Name of part/auxiliary material, part/auxiliary material number, production factory, delivered date, the quantity of the parts/auxiliary materials

Remarks:

If Sony measurement data (ICP) and the component list (or MSDS) are requested, we will immediately submit them.

* Certificate of non-use of The Controlled Substances should be submitted before the 5th working day of each month, when Sony is operating.

How to fill out the Certificate of non-use of The Controlled Substances
<1> The Certificate of non-use of The Controlled Substances (for parts inspection and approval/for mass production/for the change control confirmation sheet) in the common items

1. For the columns of company name and division name: Fill in the purchasing company name, and the division name.
2. For the column of supplier code: Fill in the supplier code of the supplier in 6 digits. If the supplier is managed using a separate code, fill in that code.
3. Company name field: Enter your company name.
4. Responsible person name field: Enter the responsible person in charge of quality assurance and affix its seal.
5. For the column of remarks: Fill in anything you would like to inform.
6. If you use a secondary supplier, management shall be done the same as your company so that the environment-management substances at level 1 are not used.

<2> The Certificate of non-use of The Controlled Substances (For parts inspection and approval)

1. When submitting parts and auxiliary materials for inspection and approval, submit the documents required for inspection and approval together with the Certificate of Non-use of Environment-management Substances (for parts inspection and approval).
2. When describing used materials, clearly state all the materials used at the delivery level.
3. Enter the names of used materials so that each portion may be known.

   Entry example  
   Power cable
   Portion name: Plug
   Raw material manufacturer name (Company XX)
   Material name/type name (XXX/XXX)

4. Regarding additives, clarify their purposes of use and describe all the additives that are used.

   Entry example  
   Power cable
   Purpose of use: Improvement of strength
   Raw material manufacturer name (Company XX)
   Material name/type name (XXX/XXX)

Notes:

( If all the data cannot be entered in the corresponding space, use a separate sheet (free format) in which any necessary data are entered, and attach to the certificate.
( If the substances used cannot be disclosed because of company secret, write so in the column of remarks, and propose a substitute.
( In case the production place is different and the used material is different, enter each of them
in the certificate of non-use. However, if the same material is used though the production place is different, describe the plant using the same material in the remarks field on the certificate of non-use of environment-related substances.

5. Attachment of backup data

( Regarding plastic, according to the pre-treatment and the measurement method specified in SS-00259, attach the analysis data by ICP per substance. Check that the measured value is less than 5 ppm for cadmium and cadmium compound used for the plastic part of plastic packages (including rubber).
As for the data, measured data of the raw material being used for parts is acceptable.

( For substances other than the above, attach a list of the ingredients (or MSDS). (It is acceptable that the ingredients list includes the names of substances which constitute the material.) At this time, make sure that any prohibited material Cadmium (Cd) is not used.

( The term of validity of the backup data
The backup data shall be valid for one year at the longest, starting from the date of measurement, provided that you make sure that the same material is being used. Also, when there has been any changes in materials or the like, make a judgement of the prohibited substances.

<3> The Certificate of non-use of The Controlled Substances  (For mass production parts. To be applied to all parts and auxiliary materials used for Sony products)

1. Submit the certificate of non-use of environment-related substances for approval/authorization as well as the confirmation form of the changes in management, as a warranty for the supplies delivered in the preceding month, to each Parts Receiving Division at Sony Corporation, once a month before the 5th working day (working days of the purchaser) of the following month.

2. To the certificate of non-use of environment-related substances for approval/authorization, attach a list in which necessary data, i.e. the part name, part No., production plant, date of delivery, and quantity of delivery of the mass production parts(including repair parts) delivered in the preceding month, is described in a separate sheet (free format). As for the parts applied to ASAP, specify ASAP and enter the actual results of carrying them into the ASAP warehouse.

3. The backup data is not required for this document. However, manage internal data so that it may be submitted promptly to Sony at its request.

4. Regarding the change control confirmation sheet, enter the result of investigation for each item and attach to the certificate of non-use of environment-related substances for approval/authorization. In the event of any changes due to the supplier's circumstances, the prior permit by Component Assurance Department at the recipient of the concerned parts and unit parts should be obtained. In the contents of changes field, enter the contents of change
example, 1-xxx-xxx-01 Change of plant AâB approved and authorized).

[Any questions on this subject shall be addressed to:]
The procurement division of the parts at Sony, or Quality Assurance Department of Procurement Center

<4> The Certificate of non-use of The Controlled Substances (For products)
The Certificate of non-use of The Controlled Substances (For products) shall be submitted to HPI EMS Representative and the product procurement division upon delivery to Sony (Sony Network Company), with the change notice at the start of mass production of products (parts, auxiliary materials, raw materials, production factories, etc.) or every time you make a change in the production.

1. For the columns of company name and person in charge: Fill in the company name and the responsible person for environment control with his/her signature.
2. For the column of purchaser (who committed OEM): Fill in the name of the division of Sony (Sony Network Company) you deliver the products.
3. Contents:
   - Product name
   - Production factory
   - Start of delivery: Date of delivery, the quantity of delivered products, and Serial No. or Lot No.
   - Start of change: Date of delivery for changed products, the quantity of delivered products, and Serial No. or Lot No.

[Any questions on this subject shall be addressed to:]
The procurement division of the products at Sony, or CS Technology Department of Customer Satisfaction Center
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Printed Controlled copy of this document is stamped “Controlled Copy” in red ink, and is maintained in the Quality Department. Distribution is via Electronic medium on the QA network drive. All printed copies not stamped are uncontrolled.
1.0 PURPOSE:

1.1 To describe processes for incoming delivery, receipt of raw materials/parts, acceptance quality control inspection to include verification and confirmation of prohibited Level I compounds and substances.

2.0 SCOPE:

2.1 To define acceptance inspection, stock control, segregation and quarantine of contaminated raw materials/products to prevent mixing and pollution.

2.2 Applies to HPI as a distributor and suppliers pursuant to delivery of raw materials and parts to SONY Corporation. Suppliers include the suppliers of parts and the agencies who do not deliver materials and parts directly to SONY Corporation.

3.0 REFERENCES:

3.1 SS-00259 SONY TECHNICAL STANDARD
MANAGEMENT REGULATIONS FOR ENVIRONMENT RELATED SUBSTANCES
to be controlled which are included in parts and materials
3.2 SONY “Guidance on environment related Quality Assurance”
3.3 Certificate of Non-Use of Hazardous Substances [FORM]
3.4 Change Control Confirmation Sheet (Form) for Change Management control

4.0 DEFINITIONS:

4.1 EMS: Environmental Management System

5.0 RESPONSIBILITIES:

6.0

5.1 EMS Representative: Shall exercise responsibility and authority for establishing and maintaining the EMS, conducting training and awareness, internal and external information management, operational control, auditing and reporting on the performance of the EMS, scheduling and chairing EPMRC Review meetings and Management Review meetings in addition to SONY Corporation as required. Provides follow-up and implementation on relevant actions agreed upon.

5.2 President: Shall authorize or delegate personnel to EMS program responsibilities. Ensures compliance to the EMS and to the internal audit process.

5.3 Environmental Program Management Review Committee: EPMRC Appointed committee members shall meet at least once a year for a comprehensive review with documentation of the EMS to ensure its continuing, stability, adequacy and effectiveness. The EMS Representative is responsible for scheduling and chairing the meeting. Meeting Review Minutes shall be published and distributed to the EPMRC and management.

5.4 HPI employees: This procedure applies to all personnel participating in the Environmental Management System

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6.0 PROCEDURE:

6.1 Delivery Inspection:

6.1.1 HPI shall conduct delivery inspections required for Incoming Quality Control (IQC) on raw materials/parts.

6.2 Incoming Acceptance Quality Control:

6.2.1 HPI Management has established delivery inspection, verification and confirmation methods of content/contents documents (Purchase Orders, Invoices and or Certificates) of raw materials/parts for environment related substances in the deliver/receiving/incoming Warehouse operations.

6.2.2 Warehouse IQC shall:

6.2.2.1 Through acceptance inspection, confirm all articles required are delivered without fault.
   1. Certificate of NON-USE of Environment Related Substances (Form) <5ppm cadmium acceptable.
   -OR- Purchase Order/Invoice which includes the following statement: ***
   2. ICP Measurement Data.
   3. MSDS Sheet list of substances and compounds.

   **NOTE: valid duration for ICP data and MSDS list shall be dated within one year.**

6.2.2.2 Conduct a delivery inspection and confirmation to include actual delivery data of previous month to include:
   1. PART NUMBER
   2. NAME OF PARTS
   3. Certificate of NON-USE of Environment Related Substances (Form) <5ppm cadmium acceptable.
   -OR- Purchase Order/Invoice which includes the following statement:

   ***The Part Number on this P.O. does not contain cadmium or cadmium compounds as required by Sony Technical Standard SS-00259.***

   4. Change Control Confirmation Sheet (Form) for Change Management control

   6.2.2.1 Immediately notify the EMS Representative President of each incident of non-conformity.

   6.2.2.2 Prevent mixing of environment related substances under quarantine which may have occurred during the manufacturing process.

   6.2.2.3 Maintain records of all raw material/part non-conformities and corrective actions.
6.3 Quarantine Prevention processes:

6.3.1 HPI Management has established quarantine and tagging processes for proper identification of content/contents of raw materials/parts in the receiving/incoming Warehouse operations.

6.3.2 Ensure prompt execution of quarantine and prevention of mixing/pollution in process of handling and storage of prohibited substances.

6.4 Stock Control:

6.4.1 Warehouse IQC shall:

6.4.1.1 Ensure that all raw materials/parts are properly stored and labeled as to prevent damage or deterioration.

6.4.1.2 Ensure a (FIFO) First-In-First-Out system is used.

6.4.1.3 Ensure discrimination control of stock of non-conformance raw materials/parts.

6.4.1.4 Ensure placement of a QUARANTINE TAG on rejected lots in a designated isolation HOLD area to prevent a delivery or shipment by mistake.

6.4.1.5 Ensure prevention of inclusion of rejected lots with accepted lots.

6.4.1.6 Ensure **Certificates on NON-USE of Environmental Related Substances** are:

1. Visible on accepted lots or stock.
2. Attached to accepted lots or stock.
3. Copies of the storage ICP measured data are provided to the EMS Representative.

6.4.1.7 Conducting a final inspection before shipping to ensure that no Level I Hazardous substances are present in the materials.

6.5 LOT/Stock traceability:

6.5.1 Establish LOT/stock tracing of environmental related substances.

6.5.2 Establish a method for LOT/stock management for incoming delivery and shipment of raw materials/parts.

6.6 Storage of Incoming Quality Control Records:

6.6.1 All inspection records shall be stored for a minimum retention period of three (3) years.

6.6.2 Storage of shipment history records to SONY Group offices are required for a period of three (3) years.

Page 4 of 4

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It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
1.0 PURPOSE:

1.1 To describe management and Quality Control criteria for suppliers of non-conforming materials and parts and countermeasure methods regarding prohibited materials to prevent recurrence.

2.0 SCOPE:

2.1 To define responsibilities, proper identification of materials, designated hold areas, corrective and preventive action to avoid mixing, pollution or shipment.

2.2 Applies to HPI as a distributor and suppliers pursuant to delivery of raw materials and parts to SONY Corporation. Suppliers include the suppliers of parts and the agencies who do not deliver materials and parts directly to SONY Corporation.

3.0 REFERENCES:

3.1 SS-00259    SONY TECHNICAL STANDARD
MANAGEMENT REGULATIONS FOR ENVIRONMENT RELATED SUBSTANCES
to be controlled which are included in parts and materials

3.2 SONY “Guidance on environment related Quality Assurance”

3.3 QUARANTINE TAG

3.4 CAR/PAR FORM (Corrective Action Request/Preventive Action Request Form)

4.0 DEFINITIONS:

4.1 EMS: Environmental Management System

5.0 RESPONSIBILITIES:

5.1 **EMS Representative:** Shall exercise responsibility and authority for establishing and maintaining the EMS, conducting training and awareness, internal and external information management, operational control, auditing and reporting on the performance of the EMS, scheduling and chairing EPMRC Review meetings and Management Review meetings in addition to SONY Corporation as required. Provides follow-up and implementation on relevant actions agreed upon.

5.2 **President:** Shall authorize or delegate personnel to EMS program responsibilities. Ensures compliance to the EMS and to the internal audit process.

5.3 **Environmental Program Management Review Committee:** EPMRC Appointed committee members shall meet at least once a year for a comprehensive review with documentation of the EMS to ensure its continuing, stability, adequacy and effectiveness. The EMS Representative is responsible for scheduling and chairing the meeting. Meeting Review Minutes shall be published and distributed to the EPMRC and management.

5.4 **HPI employees:** This procedure applies to all personnel participating in the Environmental Management System

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6.0 PROCEDURE:

6.1 HPI has established protocol, escalation and internal communication path for immediate notification whenever material or parts non-conformity occurs with regard to inspection processes or identification of environment related substances.

6.1.1 This includes the processing, segregation and quarantine of parts/raw materials concerned or under investigation.

6.1.2 Processes include reporting, corrective action, effective countermeasure, verification, checking results and documentation of the incident.

6.1.3 Immediate notification to SONY Corporation as necessary.

6.2 Incoming Quality Control shall:

6.2.1 Ensure immediate action and control is taken to isolate and quarantine the non-conforming parts/raw materials.

6.2.2 Report each incident of environmental non-conformances to the President, EMS Representative and Purchasing Manager for correction and prevention activities.

6.2.3 Vendor/Supplier notification is required for:

6.2.3.1 Process inspection and environment related substances non-conformities.

6.2.3.2 Instances where a non-conforming lot or batch has inadvertently been shipped.

6.2.4 Document each incident of non-conformity using a CAR/PAR.

6.2.5 Segregate, isolate and quarantine in a designated HOLD area all identified non-conforming materials.

6.3 Corrective/Preventive Action:

6.3.1 CAR/PAR’s shall be processed internally within 48 hours and closed within 7 days.

6.3.2 Management and EMS Representative shall:

6.3.2.1 Review the status of CAR/PAR’s.

6.3.2.2 Ensure corrective/preventive actions are implemented.

6.3.2.3 Ensure appropriate steps are taken to prevent the recurrence of non-conformities.
**NONCONFORMANCE NOTIFICATION AND CORRECTIVE/PREVENTIVE ACTION REPORT**

<table>
<thead>
<tr>
<th>DATE:</th>
<th>NN and CPA REPORT #</th>
</tr>
</thead>
<tbody>
<tr>
<td>ISSUED BY:</td>
<td>ISSUED TO:</td>
</tr>
</tbody>
</table>

Complete this information if applicable:

- **Part Number:**
- **Part Name:**
- **PO Number:**
- **Supplier Lot Number:**
- **Quantity Received:**
- **Quantity Rejected:**

**NONCONFORMANCE ORIGINATED FROM** (Circle one):
- Process Audit
- F/G Audit
- ISO Audit
- Incident
- Incoming Insp
- MRB
- Supplier
- Other:

**NONCONFORMANCE DESCRIPTION:** (To be filled by the Auditor or person reporting the nonconformance)

**IS THE CPA NECESSARY:** YES / NO

**CPA OWNER:**

**CPA PLAN DUE ON:**

**CPA PLAN EXTENSION APPROVED?:** Yes/No

**CPA PLAN NEW DUE DATE:**

**APPROVED BY:**

**ROOT CAUSE ANALYSIS:** (Attach additional supporting data if necessary)

**CORRECTIVE ACTION:**

Implementation due date: ____________

**PREVENTIVE ACTION:**

Implementation due date: ____________

**VERIFICATION PERFORMED BY:**

**DATE:**

Corrective/Preventive Actions are (Circle one): ACCEPTED / NOT ACCEPTED

**NONCONFORMANCE AND C/P ACTION CLOSE OUT SIGNATURES:**

- **QUALITY:**
- **ENGINEERING:**
- **OTHER:**

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It is the responsibility of the user to verify that this is the most recent revision of this document prior to use.
1.0 PURPOSE:

1.1 To describe the internal audit process to assess compliance with SONY’s Green Partnership Program, and environment related laws and standards to enhance and maintain the environment and quality improvement initiatives.

2.0 SCOPE:

2.1 Applies to the personnel responsible in participating in the internal environmental audits process to include HPI Distribution Centers, branch locations, contracted suppliers, Sony Corporation and its subsidiary companies.

3.0 REFERENCES:

3.1 SS-00259  SONY TECHNICAL STANDARD MANAGEMENT REGULATIONS FOR ENVIRONMENT RELATED SUBSTANCES to be controlled which are included in parts and materials

3.2 SONY “GUIDANCE ON ENVIRONMENT RELATED QUALITY ASSURANCE”

3.3 GREEN PARTNER ENVIRONMENTAL QUALITY ASSURANCE SYSTEM AUDITORS CHECKLIST (MANUFACTURERS)

3.4 GREEN PARTNER ENVIRONMENTAL QUALITY ASSURANCE SYSTEM AUDIT CHECKLIST (MANUFACTURERS)

3.5 GREEN PARTNER ENVIRONMENTAL QUALITY ASSURANCE SYSTEM AUDIT CHECKLIST (DISTRIBUTORS)

4.0 DEFINITIONS:

4.1 EMS: Environmental Management System

5.0 RESPONSIBILITIES:

5.1 EMS Representative: Shall exercise responsibility and authority for establishing and maintaining the EMS, conducting training and awareness, internal and external information management, operational control, auditing and reporting on the performance of the EMS, scheduling and chairing EPMRC Review meetings and Management Review meetings in addition to SONY Corporation as required. Provides follow-up and implementation on relevant actions agreed upon.

5.2 President: Shall authorize or delegate personnel to EMS program responsibilities. Ensures compliance to the EMS and to the internal audit process.

5.3 Environmental Program Management Review Committee: EPMRC Appointed committee members shall meet at least once a year for a comprehensive review with documentation of the EMS to ensure its continuing, stability, adequacy and effectiveness. The EMS Representative is responsible for scheduling and chairing the meeting. Meeting Review Minutes shall be published and distributed to the EPMRC and management.

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5.3 **HPI employees:** This procedure applies to all personnel participating in the internal audit process.

6.0 **PROCEDURE:**

6.1 **Operational Control:**

6.1.1 Operational control is verified through internal and external audit programs and periodic review of the EMS.

6.2 **Green Partnership Environmental Program:**

6.2.1 **Criteria:**

- 6.2.1.1 To determine compliance with the Green Partnership Environmental Program a written report shall be submitted upon SONY’s request.

- 6.2.1.2 Consent and cooperate to inspections as warranted by SONY and or its designated third party of HPI Distribution Headquarters and or Branch locations including any of its third party suppliers.

- 6.2.1.3 Any changes in the process of manufacturing of parts and or processes by parts manufacturer’s shall make prior written notice of such change to SONY.

- 6.2.1.4 HPI shall take immediate corrective action when made aware of any breach of standards stipulated by SONY to include third party supplying raw materials/parts to avoid suspension or revocation of Green Partner qualifications.
  - a) SONY shall be notified of such facts in accordance with SONY Standards.
  - b) Immediate corrective action is required in accordance with SONY’s instructions.

6.3 **EMS Representative shall:**

- 6.3.1 Establish a Master Schedule of Internal Environmental Audits.
  - 6.3.1.1 The Master Audit Schedule shall be prepared annually and updated as necessary.
  - 6.3.1.2 Prioritized by the status and importance of the activity to be audited.
    - a) Take into consideration audit requirements determined by recent audit findings.

- 6.3.2 Maintain a list of qualified auditors.

- 6.3.3 Maintain Auditor qualification records.

- 6.3.4 Maintain EMS Internal Audit Records.
  - 6.3.4.1 Identified for each site to include the progress of the environmental objectives and targets.
  - 6.3.4.2 Records shall be legible and identifiable to each activity.

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6.3.4.3 Stored and maintained so that they are easily retrievable and protected against damage, deterioration or loss.

6.3.4.4 Retain for a minimum retention period of three (3) years.

6.3.5 Audit internal environmental audit records (annually, as a minimum requirement)

6.3.6 Review all Environmental nonconformance’s and observations shall be monitored through internal audits, regulatory compliance audits and internal or external communications.

6.3.7 Review corrective actions plans for compliance to applicable standards.

6.3.8 Modify operating and process control procedures to include an corrective action measures taken as appropriate.

6.4 Internal Environmental Auditor Qualifications:

6.4.1 Environmental Lead Auditors or Auditors shall satisfy the following criteria:

6.4.1.1 Successfully complete a 3 day Lead Auditor Course (Formal classroom training) for the Green Partnership Program.

   a) Conduct a Environmental Quality Assurance System Final Audit, participating as a trainee in a Minimum of two (2) internal audits with a certified, qualified Lead Auditor.

6.4.1.2 Successfully complete a 1 day minimum Internal Auditor Course (formal classroom training) for the Green Partnership Program.

   a) Conduct a Environmental Quality Assurance System Final Audit, participating as a trainee in a Minimum of two (2) internal audits with a certified, qualified Lead Auditor.

6.5 Internal Environmental Audit Scheduling:

6.5.1 Environmental Management Representative shall:

6.5.1.1 Schedule an audit based on the master schedule or on other identified audit needs such as recent audit findings.

6.5.1.2 Assign a Lead Auditor and may also assign one or more Auditors.

**Note: Environmental Management Representative maybe be a Lead Auditor or Auditor.

6.5.1.3 Assign an audit number to the audit consisting of the facility name, year and audit number in the form YY-XX, where YY is the last two digits of the year and XX is the audit number beginning with audit number 01.

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6.6 Audit Process

6.6.1 Lead Auditor shall:

6.6.1.1 Review, if applicable, the EMS standards and procedures for the area to be audited.

6.6.1.2 Review, if available, previous internal audits.

6.6.1.3 Schedule an EMS Audit Meeting with the auditee (group to be audited) and any other auditors.

6.6.1.4 Conduct the EMS Audit Meeting.

**Note: The EMS Audit Meeting may be conducted by telephone.

6.6.1.5 Conduct the audit with any other auditors.

6.6.1.6 Document the audit process with assistance to other auditor(s) on one or more Environmental Quality System Auditor Worksheet(s).

6.6.1.7 Complete the Environment Quality Assurance System Audit Report(s).

6.6.2 Audit Team Guidelines:

6.6.2.1 Objective evidence shall be examined to determine compliance with applicable elements audited.

6.6.2.2 Each element examined shall be audited in sufficient depth to determine compliance to applicable requirements.

6.6.2.3 All nonconformities shall be explained, and if possible, verified by a member of the audited organization.

6.6.2.4 All findings shall be documented on the Internal Audit Report as a Corrective Action Request (CAR/PAR).

6.6.2.5 Specific attention shall be given to audit findings and corrective actions that were identified during previous audits.
6.7 Post-Audit Process:

6.7.1 Sufficient time shall be allocated for the Lead Auditor to prepare the Internal Audit Report after the actual audit.

6.7.1.1 The Lead Auditor shall refrain from including the names of any specific individuals audited and shall use generic titles whenever possible.

6.7.1.1 Hold a Closing Meeting.

6.7.1.2 Lead Auditor shall provide following information on each CAR/PAR:
   a) Date
   b) Audit Number
   c) CAR Number
   d) Item/Clause
   e) Detail of the Nonconformance

6.7.2 Lead Auditor shall schedule and conduct the Closing Meeting with the audited department members in attendance.

6.7.3 Lead Auditor Agenda for the Closing Meeting shall include:

6.7.3.1 Discussion of any nonconformances identified as CAR’s.

6.7.3.2 Responsibilities shall be assigned for each individual CAR.

6.7.3.3 Individuals assigned responsibility must be in attendance at the Closing Meeting.

6.7.3.4 Plan Due Date for corrective action for each CAR/PAR.
   a) If the individual assigned responsibility identifies the Corrective/Preventative Action during the Closing Meeting, there is no need to fill out the Action Plan Due Date.

6.7.3.5 If the corrective/prevention action plan has been completed by the date of the closing meeting, the actual completion date will be filled out.

6.7.4 EMS Internal Audit Report:

6.7.4.1 Lead Auditor shall:
   a) Complete any sections of the Internal Audit Report not completed during the Closing Meeting.
   b) If the corrective/preventive action plan was not documented at the closing meeting, contact The individual person responsible for each individual CAR by the date the action plan is due, and obtain the corrective action plan and corrective action due date.
   c) Ensure that all CAR’s are completed by the corrective action due date.
   d) Enter the Actual Completion Date on each original CAR sheet.

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e) Review the report for completeness.

f) Distribute copies of the report.


g) Conduct activities after the revised procedure issue date if procedures are to be revised, to verify the implementation and/or effectiveness of the corrective action taken for each CAR as soon as practical after the CAR actual completion date.

h) Complete all CAR’s and procedure revisions in a timely manner so that the audit is closed within 90 days from the date of the closing meeting.

6.6 Audit Records Filing

6.6.1 EMS Representative shall:

6.6.1.1 Maintain environment audit records.

6.6.1.2 Filed and retained per the table below:

<table>
<thead>
<tr>
<th>EMS Audit Records</th>
<th>File Location</th>
<th>Minimum retention</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master Audit Schedule of Internal Audits</td>
<td>EMS Representative Office</td>
<td>3 years</td>
</tr>
<tr>
<td>Internal Audit Reports</td>
<td>EMS Representative Office</td>
<td>3 years</td>
</tr>
<tr>
<td>Qualified Internal EMS Auditors List</td>
<td>EMS Representative Office</td>
<td>Indefinite, Maintain current status</td>
</tr>
<tr>
<td>EMS Auditor Qualification Records</td>
<td>EMS Representative Office</td>
<td>Indefinite, Maintain current status</td>
</tr>
</tbody>
</table>