NSK E 001

NSK Group

Green Procurement Standard

Edition 6

Revised in July 1, 2011

NSK Ltd.

Introduction

We recognize that response to global environmental problems is an essential condition for continuance and activity of the company, and we promote this response throughout the entirety of the NSK group.

NSK products are manufactured by taking advantage of proprietary technologies of “Motion & Control” that were developed over the years to realize the smooth motion of machines and to reduce environmentally harmful substances. We issued our “NSK Group Green Procurement Standard” in 2001 and requested your operation beyond the framework of the NSK group to plan further reductions of environmentally harmful substances and to contribute to the “creation of a recycling-oriented society”.

In recent years, restrictions against the use of certain chemical substances have been becoming increasingly strict due to regulations such as ELV Directive, RoHS Directive, and REACH as well as individual countries’ laws and regulations, and this trend will continue. While NSK has already been stepping up its internal measures, it has become increasingly important to request support from supplier on chemical substances throughout the supply chain, working together with suppliers from the stage of obtaining parts and materials.

Against this background, we have released the 6th edition of our Green Procurement Standard. We have also reviewed the NSK Environmentally Harmful Substance List.

We are requiring conformation to this standard from our suppliers. We are requesting our suppliers understand the importance of these efforts and we appreciate your further cooperation.

NSK Ltd.
Procurement Division
Quality Assurance Division
Global Environment Department

Contents

1.	Policies addressing environmental presevation……	2
2.	Objectives ……	3
3.	Scope ……..	3
4.	Definition ……	3
5.	Requirements to the Supplier ……..	4
5.1	Requirements for the Development of an Environmentally Harmful Substance Control System……	4
5.2	Requirements for the Development of an Environmental Management System (EMS) ……	5
5.3	Requirements for Environmental Protection Activities……	5
5.4	Other Requirements……..	6
6.	Evaluation and Confirmation of Compliance by NSK ……	6
7.	Documents for Submission ……..	7
	1) Agreement to Correspond on Environmental Matters……..	7
	2) Company Information Registration Sheet……..….....	8
	3) Environmental Protection Activity Investigation Sheet……..….....	8
	4) Product Environmental Impact Reduction Investigation Sheet……..…..……	8
	5) Environmentally Harmful Substance Investigation Sheet……	8
	6) Composition Investigation Sheet of Delivered Product (In principle: 100 mass% disclosure).....	8
	7) Report of analysis results of lead, cadmium, chromium (VI), mercury, specific bromine system flame retardant (PBB, PBDE) ……	8
	8) Non-inclusion certificate……..	9
	9) NSK Environmentally Harmful Substance Control System Check Sheet ……	9
8.	Analysis method of substances subject to ELV and RoHS (pretreatment) and guideline when making requests to analysis organizations……	9
9.	Handling of Information ……	11
10.	Revision …….	11
11.	Section to Contact……..	12

Attached document : Samples of each document are attached.

1. Policies addressing environmental presevation

NSK Group (hereinafter referred to as NSK) defines the environmental policy and environmental code of conduct to realize our corporate philosophy and we promote the protection of the global environment.

Corporate Philosophy

NSK aims to contribute to the well-being and safety of societies and to protect the global environment through its innovative technology integrating Motion and Control. We are guided by our vision of NSK as a truly international enterprise, and working across national boundaries to improve relationship between people throughout the world.

NSK Environmental Policy

Our commitment to environment management forms the basis of our existence and our pursuits. We are determined to take independent and assertive actions, aiming to establish recycling-oriented societies.

1. **Prevention of Global Warming**
   To actively support efforts to prevent global warming by developing Environmentally friendly manufacturing processes and technologies.
2. **Reduction of Negative Environmental Impact**
   To establish and continually improve environmental management systems and systems for the management of chemical substances in products to comply with regulations, to prevent pollution, and to reduce environmental impact.
3. **Contribution to Societies**
   To be actively involved in the social development of local communities where we operate by promoting our global corporate activities, to create an affluent societies that is in harmony with the environment, and to promote the preservation of biodiversity.

Environmental Code of Conduct

1. To promote the development of manufacturing technologies through the use of our Tribology (friction control and lubrication technologies) in order to create environmentally-oriented products.
2. To ensure energy and resource conservation within all spheres of our business operations.
3. To reform environmental management organizations by improving operational systems and clarifying chains of responsibility.
4. To more aggressively tackle environmental protection by setting and adhering to high internal standards, in addition to complying with laws, ordinances, and agreements.
5. To reduce environmental impact by promoting the switch from chemical substances that adversely affect the environment to environmentally friendly alternative substances, waste reduction, and recycling.
6. To encourage employees to understand our environmental policies and to ensure an environmental mindset in the company through education and internal communications.
7. To contribute to societies by conducting social environmental activities and addressing issues related to the

preservation of ecosystems and human health.

8. To actively communicate with environmental authorities and local communities in order to receive insightful and constructive opinions, and to disclose the ongoing status of our environmental management activities to the public.

2. Objectives

NSK will purchase environmentally sound products from suppliers who actively pursue environmental protection activities and aim to promote the “protection of the environment” beyond the framework of NSK. In addition, NSK will establish environmentally harmful substance control systems for NSK products through the supply chain by working with suppliers.

3. Scope

This standard is applicable to parts, materials, sub-materials, production ancillary materials and packaging materials purchased by NSK and to suppliers who deliver these products to NSK. This standard also applies to suppliers who are assembling and processing parts and materials (forging, turning, grinding, surface treatment, etc.) for delivery. If a supplier has more than one operating unit, this standard applies to all their operating units which manufacture parts delivered to NSK.

Table 1. Specific examples of products for delivery

Application	Content	Specific examples of products for delivery
Part, material	Parts, materials, finished products, subassemblies, etc used for NSK products.	Resin/plastic (parts, material), rubber (parts, material), grease, oils, solder, surface treatment (plating), steel material, non-metallic material, processed part, screw, sensor, motor, controller, electronic part, etc.
Sub-material	Material adhering to NSK product at point of shipping.	Rust-preventive oil, adhesives, paints, tape, labels, instruction manual, ink, marker, etc.
Production ancillary material	Lubricants, grinding wheels, cutting tools used in the NSK production process.	Heat treating oil, processing oil (forging, turning, grinding), surface treating agent, washing agent, solvent (thinner, etc.), intermediate rust-preventive oil, cutting tools, grinding wheels, etc.
Packaging material	Materials used for transportation and conveyance of NSK products.	Polyethylene boxes, trays, polyethylene bags, polyethylene sheets, stretch film, cushioning materials, pallets, wooden frames, corrugated boards, tape, tying band, labels, printing inks, etc.

4. Terms and Definitions

1) Environmentally harmful substances

This refers to substances that impede or may impede the protection of the environment or maintenance of the health of people.

2) Intentional inclusion

Intentional inclusion refers to cases where substances are continuously used and included in order to maintain physical properties, quality, and appearance of materials etc.

3) Unintentional inclusion

Unintentional inclusion refers to instances where substances are not purposely added to the composition.

- where substances are included in raw materials and cannot be technologically removed in the refining process as an industrial material.
- where by-products produced in the manufacturing process cannot be technologically removed.

4) Acceptable concentration (threshold value)

Applied only to unintentional inclusion, this refers to values below which materials are not subject to a ban or reduction.

- The concentration is calculated based on the weight of the homogeneous material in which it is present.
- In the case of intentional inclusion, even if the concentration is below this threshold it will still be subject to a ban, reduction, or control.

5) NSK prohibited substances

Substances which must not be included either within or on the surface of product. Any products containing such substances must not be delivered to NSK.

6) NSK reduced substances

Substances for which an approval must be obtained from NSK if such substances are included in or on delivered product. When substitute is made, the change shall be implemented in a controlled manner. If NSK specifies a timescale for total abolition, this must be met.

7) NSK observation substances

Substances for which the purpose and use shall be clarified and monitored. A report on the use of such substances shall be made upon request from NSK.

8) Evidence

This refers to chemical composition tables, mill sheets, or analysis data. Analysis data refers to the measurement of chemicals either or on the product.

9) Supplier

This term refers to those from whom NSK purchases parts, materials, sub-materials, production ancillary materials and packaging materials, or companies and offices that supply parts, materials, sub-materials, production ancillary materials, and packaging materials to NSK with a supplier (trading company, etc.) acting as an intermediary.

10) IMDS (International Material Data System)

IMDS is the system to control information of the material standard, weight and chemical composition of automotive parts. Car manufacturers and related manufactures require their suppliers to disclose at least 90% (by mass) of the chemical composition of the supplied part using IMDS. The system was originally introduced to confirm conformity with the European ELV Directive, identify the use of environmentally harmful substances and determine the recycling ratio for passenger vehicles sold on the European market. It has now become the recognized system through which all vehicle and related manufacturers require registration of product information.

5. Requirements to the Supplier

The requirements with which NSK suppliers should comply are shown below.

1) Development of environmentally harmful substance control system
(Products with NSK prohibited substances in them or on them shall not be delivered.)
2) Development of an Environmental Management System (EMS)
3) Promotion of environmental protection activities

- Where any relevant laws/treaties or industry guidelines have been newly established or revised subsequent to the publication of this standard, or where additional requirements have been specified by an NSK customer, NSK may ask the supplier to take appropriate measures accordingly.
- Requirements specified in drawings and purchasing specifications shall take precedence over this standard.

5.1 Requirements for the Development of a Environmentally Harmful Substance Control System

Ensure that NSK prohibited substances are not included within or on products delivered to NSK.

1) Control of NSK prohibited substances at the stage of design and development

The supplier shall document, implement and communicate to NSK a control method at the stage of design and development to prevent NSK prohibited substances from being included in or adhered to products delivered to NSK.

2) Control of NSK prohibited substances at the stage of production

The supplier shall prescribe control methods in the process manual and QC process chart etc. and ensure such methods are known and implemented so as to prevent NSK prohibited substances from being included in or on products delivered to NSK during the production stage.

3) Control of NSK prohibited substances through supply chains

Requirements include a mechanism to exercise control through the supply chain to prevent NSK prohibited substances from being included within or on products delivered to NSK.

For details, refer to “NSK Environmentally Harmful Substance Control System Check Sheet”(Form 9-2).
In addition, if either “Supplier Quality Assurance Procedure” (NSK Q 001) or the “Material Supplier Quality Assurance Procedure” (NSK Q 002) is presented by NSK, deploy them along with this standard.

5.2 Requirements for the Development of an Environmental Management System (EMS)

The supplier is requested to become certified under the following standard or implement an equivalent system:International standards ISO 14001, EMAS (the EU Eco-Management and Audit Scheme), other third party certificates such as “KES” (Kyoto Environmental Management System Standard), EcoAction 21 (Ministry of the Environment), and Eco Stage. If a supplier has an alternate system to manage their Environmental Management System, the supplier may be requested to provide documentation and objective evidence the system is in place and effective. This would include supplier developed self-audits (such as conducted by the supplier’s corporate office) or third party non certified audits conducted by an environmental professional showing due diligence has been executed in assessing the system.

5.3 Requirements for Environmental Protection Activities

In doing business with NSK, suppliers are requested to promote environmental protection activities in all areas of their business activities such as reduction of greenhouse gas emissions, water consumption, and waste, as well as prevention of air, water, and soil pollution, and protection of biodiversity.

In particular, in efforts to reduce greenhouse gas emissions, the supplier is requested to understand the amount of energy used and take steps to reduce this. In addition, the supplier is requested to provide data based upon NSK's requests.

5.4 Other Requirements

1) Cooperation with audit

The supplier shall periodically perform self-audit using the NSK Environmentally Harmful Substance Control System Check Sheet in line with requests from NSK. If it is deemed necessary based on the self-audit results, NSK may visit the supplier and perform on the on-site audit.

2) Answer to investigation requested by NSK

NSK may investigate the following items. The supplier is requested to reply promptly.

- Investigation of product composition (Form corresponding with IMDS)
- Investigation regarding customers' inquiries about particular chemicals

6. Evaluation and Confirmation of Compliance by NSK

NSK will determine the suitability of a supplier on the basis of a range of judgment criteria, including whether or not the supplier is involved in environmental protection activities and considers reduction of environmentally harmful substances in procured product.

Appropriateness of purchase shall be judged after evaluating the said supplier and their product by the documents submitted. Any supplier scoring Evaluation Level E on the Environmental Protection Activity Investigation Sheet shall be required to make an improvement. If no improvement is made, the business with the said suppler may be reconsidered. NSK may ask for additional information, analyze products or implement on-site audit to confirm compliance with requirements specified in this standard.

7. Documents for Submission

Table 2 Documents for submission

Documents for submission	Part, Mat-erial	Sub-mat-erial	Prod. aux. mat-erial	Pack. mat-erial	Destination
1) Agreement of Correspondence to Environment Matters (Form 1)	◎	◎	◎	◎	Office in charge
2) Company Information Registration Sheet (Form 2)	◎	◎	◎	◎	Office in charge
3) Environmental Protection Activity Investigation Sheet (Form 3)	◎	◎	◎	◎	Office in charge
4) Product Environmental Impact Reduction Investigation Sheet (Form 4)	○	○	○	○	The department requesting it
5) Environmentally Harmful Substance Investigation Sheet (Form 5)	○	○	○	○	The department requesting it
6) Composition Investigation Sheet of Product Delivered (In principle: 100 mass% disclosure) (Form 6)	○	○	—	—	The department requesting it
7) [Lead, cadmium, chromium (VI), mercury, specific bromine system flame-retardant (PBB, PBDE)] Analysis Result Report - Screening (Qualitative) Analysis Result Report (Form 7-1) - Precision (Quantitative) Analysis Result Report (Form 7-2)	○	○	○	○	The department requesting it
8) Non-inclusion Certificate (Form 8)	○	○	○	○	The department requesting it
9) Report & sheet of NSK Environmentally Harmful Substance Control System Check - NSK Environmentally Harmful Substance Control System Check Report (Form 9-1) - NSK Environmentally Harmful Substance Control System Check Sheet (Form 9-2)	○	○	○	○	The department requesting it

◎ Mandatory ○ Upon request

* When contents of submitted document change, resubmit within 2 weeks.

1) Agreement to Correspond on Environment Matters(Form 1)

The supplier is requested to submit an agreement form regarding NSK Group Green Procurement Standard. Any objection to the revised contents should be stated.

(1) When the supplier begins business with NSK, this Agreement must be submitted.

(2) If the suppliers delivers to more than one NSK legal entity within the NSK Group (see listing at end of this standard), an agreement should be signed for each one.

2) Company Information Registration Sheet (Form 2)

(1) The senior manager/director with responsibility for the environmental, together with environmental officer/representative responsible for day to day operational activity shall be detailed. If there are any modifications or changes, the revised information must be resubmitted.

(2) If the supplier has more than one business office, this sheet shall be submitted for every business office.

(3) When the supplier is a trading company(distributor), the manufacturer shall also be registered.

3) Environmental Protection Activity Investigation Sheet (Form 3)

NSK will confirm development of the environmental management system on the basis of ISO 14001 or implementation of an equivalent environmental management system. Any supplier that has not yet obtained ISO 14001 certificate shall make a self-evaluation of its efforts regarding NSK's environmental policies using the “Environmental Protection Activity Investigation Sheet”.

4) Product Environmental Impact Reduction Investigation Sheet (Form 4)

NSK will confirm that the supplier are implementing various environment-oriented measures for their products, such as energy saving, recycling, simplification of packaging/packaging materials, ease of disposal etc., at each stage of the product life cycle, ranging from the materials used for manufacturing to the usage of the product and its disposal. Suppliers are requested to self-evaluation their efforts using the Product Environmental Impact Reduction Investigation Sheet.

5) Environmentally Harmful Substance Investigation Sheet (Form 5)

NSK is requested by its customer to report on environmentally harmful substances included in its products as well as the parts and materials used during manufacture. Therefore, the suppler shall report on the products it supplies to NSK using “Environmentally Harmful Substance Investigation Sheet”.

6) Composition Investigation Sheet of Delivered Product(In principle, 100 mass% disclosure) (Form 6)

Automotive manufacturers require disclosure of more than 90 mass% of the chemical composition contained in NSK products in accordance with IMDS (International Material Data system). In principle, NSK requires suppliers to disclose 100 mass%, but disclosure of at least 90 mass% is permitted when disclosure cannot be made for reasons of confidentiality.

However, for substances list in the Environmentally Harmful Substance Investigation Sheet, or specifically listed in any regulating agency, such as, but not limited to Substances of Very High Concern (SVHC) , full disclosure of that substance must be made.

7) [Lead, cadmium, chromium (VI), mercury, specific bromine system flame-retardant (PBB, PBDE)] Analysis Result Report

- Screening (Qualitative) Analysis Result Report (Form 7-1)

- Precision (Quantitative) Analysis Result Report (Form 7-2)

NSK is requested by its customers to submit analysis data of applicable 6 substances as evidence of non-inclusion of substances applicable to ELV and RoHS Directives. The supplier shall, upon request by NSK, promptly submit Forms 7-1 and 7-2 with analysis data of 6 substances using the screening

(qualitative) analysis and precision (quantitative) analysis.

8) Non-inclusion Certificate (Form 8)

This is a document that certifies that, for every product to be delivered, no more than the acceptable concentration (threshold value) of NSK prohibited substances is included within or adhered to parts, materials, sub-materials, production auxiliary materials and packaging materials delivered to NSK. The list of prohibited substances is defined in the least issue of the List of NSK Environmentally Harmful Substances.

9) NSK Environmentally Harmful Substance Control System Check Sheet (Forms 9-1 and 9-2)

This is a check sheet to evaluate the environmentally harmful substances control system NSK requires of its suppliers.

8. Analysis method of substances subject to ELV and RoHS (pretreatment) and guidance when making requests to analysis organizations.

1) Sampling and hints to request to an analysis organization

Attention shall be paid to the following items when requesting analysis by an external organization.

(1) Sampling shall be made after disassembling down to homogeneous materials(*1) so that each material is analysed individually.

Ex.: Rubber seal shall be divided into rubber and core metal to analyze separately.

(2) Part name, your part name, NSK part name, color shall be identified.

(3) Methods of pretreatment and analysis shall be defined.

Ex.: For ICP quantitative analysis, it is important that the specimen is thoroughly melted in pretreatment.

(4) In principle, the testing laboratory used shall be certified to ISO/IEC 17025(*2).

(*1): Homogeneous materials is a material having “uniform composition entirely” which cannot be divided into separate material by a mechanical method. Example: plastics, ceramics, glass, metal, alloy, paper, board, resin, coating, and surface treatment.

(*2): ISO/IEC 17025 specifies the general requirements for the competence to carry out tests and/or calibrations, including sampling.

2) Analysis flow and its method

(1) Analysis flow

In principle, analysis shall be the precision (quantitative) type A screening (qualitative) analysis by X-ray fluorescence analysis is also permitted. However, when an element of substance applicable to ELV and RoHS is detected by the screening (qualitative) analysis, the precision (quantitative) analysis must always be made. The purpose of Inclusion must be confirmed with your supplier and it shall be reported to NSK by entering in “Comment” of “4. Analysis result” Table in the precision (quantitative) analysis result report (Form 7-2)

Analysis result report shall be made by the following Forms.

【Precision (quantitative) analysis】

Precision (Quantitative) Analysis Result Report (Form 7-2)

【Screening (qualitative) analysis】

Screening (Qualitative) Analysis Result Report (Form 7-1)

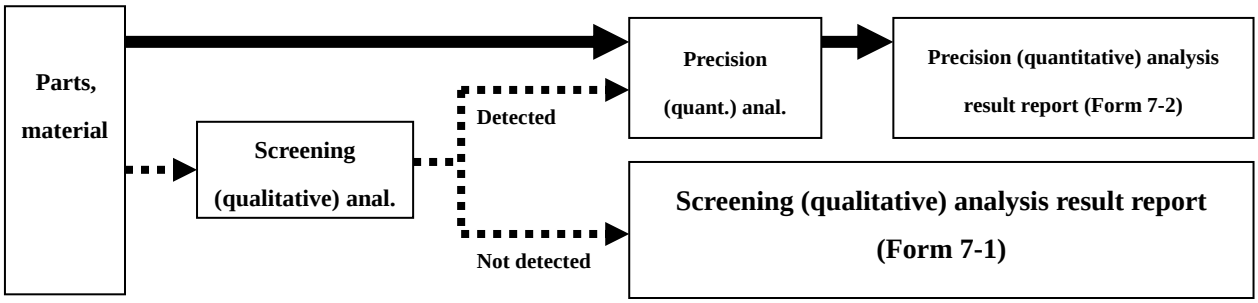

Fig. 1 Analysis flow of substance testing applicable to ELV and RoHS

(2) Analysis method

Table 3 Analysis method

Name of substance	Analysis method	
	Screening (qualitative) analysis (Judgment of presence of element)	Precision (quantitative) analysis (Correct judgment of content)
Cadmium (Cd) Lead (Pb) Mercury (Hg)	- Energy dispersion type X-ray fluorescence analysis (EDXRF) - Wave length dispersion type X-ray fluorescence analysis (WDXRF)	- Inductive coupling plasma emission spectroscopic analysis [ICP-AES (OES)] - Inductive coupling plasma mass spectrometric analysis (ICP-MS) - Atomic-absorption spectroscopy (AAS)
Chromium (VI) (Cr^{6+})	- Energy dispersion type X-ray fluorescence analysis (EDXRF) (However, measurement of total amount of chromium) - Wave length dispersion type X-ray fluorescence analysis (WDXRF) (However, measurement of total amount of chromium)	- Diphenylcarbasid spectrophotometry
Specific bromine system flame-retardant （PBB、PBDE）	- Energy dispersion type X-ray fluorescence analysis (EDXRF) (However, measurement of total amount of bromine) - Wave length dispersion type X-ray fluorescence analysis (WDXRF) (However, measurement of total amount of bromine)	- Gas chromatograph mass spectrometry (GC-MS)

3) Confirmation item of analysis result report

When received an analysis report from an analysis organization, the following items shall be confirmed.

1) Are part name, supplier part No., NSK part No, color described ?

2) Is the part disassembled to homogeneous material level and is every material analyzed ?

Ex.: For rubber seals, is it divided into rubber and core metal so as to analyze each separately.

3) Is the pretreatment suitable ?

Ex.: For ICP quantitative analysis, "specimen was thoroughly melted during pretreatment." must be described.

4) Implementation of the suitable analysis method shall be confirmed.

5) Are the lower limit of quantitative analysis and the lower limit of detection described ?

6) Is the name of analysis organization included ?

7) Are the date of reception, date of analysis and date of report described ?

8) Are the manufacturer and model of analyzer described ?

9. Handling of Information

The supplier's company information and private information obtained by NSK through Green Procurement activities shall not be released to third parties without prior consent. However, information on the composition of chemical substance may be released to customers as NSK final product information.

10. Revision

This standard is subject to revision depending on legal requirements, social conditions or customer demand. The latest edition is available by access to the home page of NSK Ltd.

Table 4 Revision history

Month/year	Rev. type	Edition	Contents
June, 2001	Newly established	Initial edition	
December, 2002	Partial revision	Edition 2	Added release of information for environmentally harmful substances.
March, 2004	Whole revision	Edition 3	Added control of environmentally harmful substances and wholly reviewed.
February, 2006	Whole revision	Edition 4	Added control of environmentally harmful substances and wholly reviewed.
July, 2008	Whole revision	Edition 5	Clarification of "Requirement" Added "Definition". Partial reviewed control of environmentally harmful substances. Reviewed "NSK Environmentally Harmful Substance List". Partial reviewed "Environmentally Harmful Substance Control System Check Sheet" Whole reviewed analysis method of 6 substances.
July, 2011	Whole revision	Edition 6	Reviewed "Definition". Reviewed and added Requirements to the Supplier Reviewed "NSK Environmentally Harmful Substance List" Reviewed environmental protection activities Reviewed non-inclusion certificate Reviewed "NSK Environmentally Harmful Substance Control System Check Sheet" Reviewed analysis methods of 6 substances

11. Section to contact

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NSK Ltd. Group Corporation Shown in the separate table.

Attached Documents:

The attached documents are subject to revise. The latest edition is available from the exclusive download site.

1) Agreement to Correspond on Environment Matters (Form 1)
2) Company Information Registration Sheet (Form 2)
3) Environmental Protection Activity Investigation Sheet (Form 3)
4) Product Environmental Impact Reduction Investigation Sheet (Form 4)
5) Environmentally Harmful Substance Investigation Sheet (Form 5)
6) Composition Investigation Sheet of Delivered Product (In principle: 100 mass% disclosure) (Form 6)
7) [Lead, cadmium, chromium (VI), mercury, and specific bromine system flame-retardant (PBB, PBDE)] Analysis Result Report
   - Screening (Qualitative) Analysis Result Report (Form 7-1)
   - Precision (Quantitative) Analysis Result Report (Form 7-2)
8) Non-inclusion Certificate (Form 8)
9) NSK Environmentally Harmful Substance Control System Check Report & Sheet
   - NSK Environmentally Harmful Substance Control System Check Report (Form 9-1)
   - NSK Environmentally Harmful Substance Control System Check Sheet (Form 9-2)

the separate table

NSK Ltd. Group Corporation

NSK STEERING SYSTEMS CO.,LTD.

NSK PRECISON CO.,LTD.

NSK MICRO PRECISION CO.,LTD.

NSK KYUSHU CO.,LTD.

NSK NEEDLE BEARING LTD.

NSK MACHINERY CO.,LTD.

NSK-WARNER K.K.

IJK LTD.

NSK CORPORATION

NSK PRECISION AMERICA,INC.

NSK STEERING SYSTEMS AMERICA,INC.

NSK BRASIL LTDA.

NSK BEARINGS EUROPE LTD.

NSK PRECISION UK LTD.

NSK STEERING SYSTEMS EUROPE LTD.

NEUWEG FERTIGUNG GMBH

NSK BEARINGS POLSKA S.A.

NSK STEERING SYSTEMS EUROPE(POLSKA) SP.ZO.O.

KUNSHAN NSK CO.,LTD.

NSK STEERING SYSTEMS DONGGUAN CO.,LTD.

CHANGSHU NSK NEEDLE BEARING CO.,LTD.

SUZHOU NSK BEARINGS CO.,LTD.

NSK-WANDA ELECTRIC POWER ASSISTED STEERING SYSTEMS CO.,LTD.

SHENYANG NSK PRECISION CO.,LTD.

SHENYANG NSK CO.,LTD.

PT.NSK BEARINGS MANUFACTURING INDONESIA

NSK BEARINGS MANUFACTURING(THAILAND)CO.,LTD

SIAM NSK STEERING SYSTEMS CO.,LTD

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ISC MICRO PRECISION SDN.BHD.

NSK-ABC BEARINGS LTD.

RANE NSK STEERING SYSTEMS LTD.

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