

Strengths and Improvement Areas

💭 Environment	Weight 🔹 🕢 🌑
Strengths (38)	
Policies	
Strengths	
Standard policy on a majority of environmental issues	
Endorsement of the United Nations Global Compact (UNGC) (at parent company level)	
Actions	
Strengths	
Energy audit or carbon assessment performed	
Integration of eco-design features in product design	
Formalized process in place to assess and document environmental risks	
ISO 50001 certified	
Formal measures implemented to avoid road congestion	
Monitoring of pollutant concentrations into waste gas (e.g. VOC, heavy metals, NOx, SOx)	
Measures to reduce energy consumption	
On-site wastewater treatment unit	
Measures to reduce paper consumption	
Measures to reduce noise at worksite/construction site	
Employee awareness training on water management	
Carbon footprint study	
Waste heat recovery or combined heat & power system (CHP) in place	
Formal timeline defined to reduce consumption of hazardous substances	
Eco-design measures to improve insulation of building	
Reduction of energy consumption through innovative technologies	
Monitoring of noise level	
Measures to optimize transport of employees or reduce CO2 emissions from transport	
Regular soil testing for heavy metal contamination	
Control of wastewater generated in finishing operations such as quenching and deburring	
Company-specific emergency preparedness & response procedure	

Steps to detect and eliminate groundwater contamination		
Measures to reuse or recycle waste		
Measures to avoid emissions of dust or particles		
Production of renewable energy		
Measures implemented to reduce pollutants discharged into water		
Infrastructures implemented to enable recycling of water		
Waste management measures in place		
Measures for handling hazardous substances		
Packaging designed for recyclability		
Employee awareness/training program on energy conservation		
ISO 14001 certified on more than 81% of operational sites		
Results		
Strengths		
Reporting on total water consumption		
Reporting on total gross Scope 1 and 2 GHG emissions		
Materiality analysis in sustainability reporting		
Standard reporting on environmental issues		
Improvement Areas (6)		
Policies		
Priority Improvement Areas		
Medium Inconclusive documentation or only basic policy on some relevant issues [i.e. water, local & accidental pollution]		
Low No quantitative target on environmental issues		
Results		
Priority Improvement Areas		
Medium No alignment with a widely recognized reporting standard (e.g. GRI, SASB)		
Low Declares reporting on total energy consumption, but no supporting documentation available		
Low No information on reporting on total weight of hazardous waste		
Low No information on reporting on total weight of non-hazardous waste		

Strengths (39)

Policies

Strength

Comprehensive policy on a majority of labor or human rights issues

Quantitative objectives set on some relevant issues [i.e. employee health & safety]

Health and safety policy also covers subcontractors working on the company premises

Endorsement of the United Nations Global Compact (UNGC) (at parent company level)

Actions

Strengths

Additional leave beyond standard vacation days

Employee satisfaction survey

Childcare services or allowance

Collective agreement on diversity, discrimination, and/or harassment

Collective agreement on training & career management

Collective agreement on working conditions

Flexible organization of work available to employees (e.g. remote work, flexitime)

Health care coverage of employees in place

Whistleblower procedure on discrimination and harassment

Awareness training regarding diversity, discrimination, and/or harassment

Measures to promote a gender inclusive environment

Active measures for the prevention of musculoskeletal disorders

Employee representatives or employee representative body (e.g. works council)

External audits on health & safety issues

Internal audits on health & safety issues

Employee health & safety detailed risk assessment

Provision of working conditions and infrastructure to accommodate employees with disabilities

Awareness training to prevent child labor, forced labor and human trafficking

Regular assessment (at least once a year) of individual performance

Interactive session with employees regarding working conditions

Active preventive	measures for stress and noise	
Mandatory health	check-up for employees	
Active preventive	measures for Repetitive Strain Injury (RSI)	
Specific procedure	es for handling of chemicals or hazardous substances	
Official measures	promoting career mobility	
Provision of skills of	development training	
Measures to preve	ent on-site substance use	
Structured social c	dialogue measures in place (e.g. collective agreement)	
Joint labor manage	ement health & safety committee in operation	
Training of relevar	nt employees on health & safety risks and best working practices	
Results		
Strengths		
Poporting on training		
Reporting on train	ing hours per employee	
Materiality analysi	is in sustainability reporting	
Reporting on accid	lent severity rate	
Reporting on accid	lent frequency rate	
Standard reporting	g on labor and human rights issues	
Improvement Areas (5)		
Policies		
Priority 1	Improvement Areas	
Medium	Inconclusive documentation or only basic policy on some relevant issues [e.g. child labor, forced labor & human trafficking]	
Actions		
Priority 1	Improvement Areas	
Medium	No OHSAS 18001 certification	
	Supporting documentation demonstrates a medium level of coverage of labor and human rights actions throughout the company operations/workforce	
Low	Declares that job applicants are responsible for recruitment fees	
Results		
Priority 1	Improvement Areas	
Medium	No alignment with a widely recognized reporting standard (e.g. GRI, SASB)	

Strengths (17)

Policies

Strength

Endorsement of external initiative on ethics issues [Conseil National des Achats]

Comprehensive policies on ethics issues

Endorsement of the United Nations Global Compact (UNGC) (at parent company level)

Actions

Strength

Incident response procedure (IRP) to manage breaches of confidential information

Whistleblower procedure to report ethics issues

Awareness training on ethics issues

Periodic information security risk assessments performed

Provision of competitor interaction guidelines to key employees

Periodic corruption risk assessments performed

Supporting documentation demonstrates a high level of coverage of ethics actions throughout the company operations

Waste anonymization

Audits of control procedures to prevent corruption

Third party anti-corruption due diligence program in place

Specific approval procedure for sensitive transactions (e.g. gifts, travel)

Audits of control procedures to prevent anticompetitive practices

Specific certification on ethics [IATF]

Results

Strengths

Materiality analysis in sustainability reporting

Improvement Areas (3)

Actions

Priority

Medium No supporting documentation regarding third party due diligence on information security

Results

Dright

High

6 Sustainable Procurement Weight 🔹 🕢 🔵 Strengths (14) Policies Endorsement of the French Charter for Responsible Supplier Relationship Comprehensive sustainable procurement policies on both social and environmental factors Actions Supporting documentation demonstrates a high level of coverage of sustainable procurement actions throughout the company supplier base/operations Supplier CSR code of conduct in place Integration of environmental, social and health & safety criteria when purchasing products Formal assessment of suppliers' progress with regards to REACH requirements Capacity building of suppliers on environmental or social issues (e.g. corrective actions, training) On-site audits of suppliers on environmental or social issues Regular supplier assessment (e.g. questionnaire) on environmental or social practices Training of buyers on social and environmental issues within the supply chain CSR risk analysis (i.e. prior to supplier assessments or audits) Results Materiality analysis in sustainability reporting Declares using no tin, tantalum, tungsten, gold, and/or their derivatives Standard reporting on sustainable procurement issues **Improvement Areas (2)** Actions Declares sustainable procurement objectives are integrated into buyer performance reviews, but no supporting documentation available

Results

No alignment with a widely recognized reporting standard (e.g. GRI, SASB)



asked a Michigan federal judge to certify a class of direct buyers accusing six manufacturers, including NTN Corp, of conspiring to cook prices for the products in multidistrict litigation over a wide-ranging auto parts price-fixing conspiracy.

A Ethics

→ No score impact

Ce samedi 25 février, un incendie s'est déclaré dans la soirée à l'usine SNR à Seynod. Une centaine de mètres carrés ont été touchés par les flammes. Mais l'activité courante de l'entreprise ne devrait pas être interrompue.

Labor & Human Rights

→ No score impact

→ No score impact

manufacturer from Japan, engaged in an auto

parts price-fixing scheme.

∂[†]**∂** Ethics

30 November 2016

NTN Inks \$6.6M End-Payor Deal In Auto Parts Price-Fix MDL

http://www.law360.com/articles/867150/ntn-inks-6-6mend-payor-deal-in-auto-parts-price-fix-mdl

Japanese bearing manufacturer NTN Corp. has agreed to a \$6.57 million settlement in sprawling multidistrict litigation over alleged auto parts price-fixing, according to documents filed in Michigan federal court Tuesday.

a Ethics

 \rightarrow No score impact

21 November 2016

NTN Corp Settles Auto Bearings Price-Fix Claims For \$10M

http://www.law360.com/articles/864495/ntn-corpsettles-auto-bearings-price-fix-claims-for-10m

Japanese bearing manufacturer NTN Corp has reached a \$10 million agreement to settle allegations by indirect purchasers that the company conspired to fix the price of bearings used in automobiles.

A Ethics

3 May 2016

NTN à Allonnes : un accord met fin à la grève

http://www.ouest-france.fr/pays-de-la-loire/le-mans-72000/ntn-allonnes-un-accord-met-fin-la-greve-4203367

Après une semaine de grève qui a perturbé les lignes de production de cette société spécialisée dans les transmissions automobiles et implantée à Allonnes (800 salariés dont 650 CDI), le travail a repris chez NTN dans la nuit de lundi à mardi.Un conflit sur fond de négociation annuelle portant sur des revendications salariales était à l'origine de ce mouvement qui a donc pris fin.Un protocole d'accord a été signé par les organisations syndicales et la direction.

2015 IPE Regulatory Record for Beijing NTN-

http://www.ipe.org.cn/IndustryRecord/regulatoryrecord.aspx?companyId=237060&dataType=0&isyh=0

In 2015, the subsidiary Beijing NTN-Seohan

Driveshaft Co., Ltd. violated air pollution control

penalty notice by the Beijing Tongzhou District

management system and received administrative

Seohan Driveshaft Co., Ltd. [CN]

Environmental Protection Bureau.

ດວວ ເດິດ Labor & Human Rights

17 August 2015

 \rightarrow No score impact

 \rightarrow No score impact

18 April 2016

PSA demands damages over price-fixing

http://europe.autonews.com/article/20160418/COPY/3041899 demands-damages-over-price-fixing

Companies from French automaker PSA Group are seeking hundreds of millions of dollars in damages for overpriced parts from NTN Corp and other bid-rigging suppliers. PSA's demand is an unusually public move against suppliers engulfed in a multiyear global cartel crackdown that stretched from the U.S. and the European Union to Japan and beyond.

A Ethics

ightarrow No score impact

13 November 2015

NTN-SNR Roulements écope d'une amende de 87,5 millions d'euros suite à une plainte de Volvo

http://france3-regions.francetvinfo.fr/alpes/hautesavoie/annecy/ntn-snr-roulements-ecope-d-une-amendede-875-millions-d-euros-suite-une-plainte-de-volvo-851507.html

Un tribunal arbitral, rattaché à la chambre de commerce de Stockholm, a condamné NTN-SNR Roulements, basée à Annecy, à une amende de 87,5 millions d'euros pour des roulements considérés comme défectueux vendus au constructeur automobile suédois Volvo.

En Haute-Savoie, le procureur fait feu sur

http://www.cnt-tas.org/2015/05/26/mediapart-haute-

savoie-procureur-fait-feu-sur-inspection-du-travail/

Avec plus de 2 400 salariés répartis sur cinq

japonais NTN, est ce qu'on appelle un gros

Au vu de son insolente santé économique en

plein marasme, NTN-SNR devrait créer des

indéterminée sur des postes permanents de

et place de salariés en contrat à durée

usines, NTN-SNR-Roulements, filiale du groupe

pourvoyeur d'emplois à Annecy en Haute-Savoie.

emplois et augmenter les salaires. Eh bien non, il

use et abuse de travailleurs intérimaires en lieu

production, généralement les moins qualifiés et

l'inspection du travail (Mediapart)

A Ethics

26 May 2015

 \rightarrow No score impact

→ No score impact

3 March 2015

Environment

Japanese Court Convicts Bearing Manufacturer and Former Executives

http://www.lexology.com/library/detail.aspx? g=b3e9082b-cd3d-41b1-b090-d8a2924e4ea3

Though it is rare to see a criminal price-fixing case to go to trial in Japan, on February 4, 2015, the Tokyo District Court convicted NTN Corporation, a Japanese bearing manufacturer, and two of its former executives for violations of the Anti-Monopoly Act of Japan in connection with alleged participation in a cartel to fix prices for the domestic sales of bearings. The court imposed a 400 million yen (approximately \$3.4 million) criminal fine on NTN, and the company's former executives were sentenced to 18 months and 12 months in prison, respectively.

7 July 2015

Lawsuit: Employees claim NTN didn't pay for extra work

http://www.heraldbulletin.com/news/local_news/lawsuitemployees-claim-ntn-didn-t-pay-for-extrawork/article_443d68e3-f76d-5ad7-ab9d-8300e683604a.html

A Columbus, Ind., worker on Monday became the 30th person to join in a federal lawsuit filed against NTN Driveshaft Inc. by employees claiming the firm violated the Fair Labor Standards Act.The lawsuit was initiated in January 2014 when Stefan Hartford, an assembly line worker, filed a complaint against the Columbus manufacturer saying NTN had not paid some hourly employees for time that was worked "off the clock" or for overtime.

<u>ooo</u> ርጊን Labor & Human Rights

→ No score impact

Labor & Human Rights

les plus difficiles.

→ No score impact

Ethics

→ No score impact

24 February 2015

OSHA Penalty for Serious H&S Standard Violations

https://www.osha.gov/pls/imis/establishment.inspection_deta id=1042084.015

In February 2015, Ntn-Bower Corp in Macomb, IL, was fined USD 8,000 for two serious violations of U.S. OSHA health and safety standards.

 \swarrow Labor & Human Rights \rightarrow No score impact

5 February 2015

OSHA Penalty for Serious H&S Standard Violation

https://www.osha.gov/pls/imis/establishment.inspection_deta id=1029848.015

In February 2015, American Ntn Bearing Mfg Corp in Elgin, IL, was fined USD 2,975 for one serious violation of U.S. OSHA health and safety standards.

<u>Ω</u> Labor & Human Rights

→ No score impact

19 August 2014

China Fines Japan Bearing Makers for Antitrust Violations

http://www.bloomberg.com/news/articles/2014-08-19/china-imposes-28-million-antitrust-fine-on-japan-s-nsk

China's antitrust regulator fined Japanese bearing makers NSK Ltd. and NTN Corp. a combined 4.8 billion yen (\$47 million) for violating rules amid a probe into industry pricing practices.NSK and NTN were fined 2.9 billion yen and 1.9 billion yen, respectively, by China's National Development and Reform Commission, according to the companies' statements to the Tokyo Stock Exchange.

Japan Fines Bearing Cos. \$142M For Price-

http://www.law360.com/articles/428573/japan-fines-

Japan's antitrust regulator on Friday fined NTN

conspired to fix prices for both automotive and

Corp. and other bearing manufacturers 13.4

billion yen (\$142 million) for violating the

Antimonopoly Act, saying the companies

bearing-cos-142m-for-price-fixing

industrial machinery bearings.

∂ thics

Fixing

∂¹**∂** Ethics

29 March 2013

 \rightarrow No score impact

27 May 2014

Singapore fines Japanese ball bearing firms \$\$9.3 mln for price-fixing

http://www.reuters.com/article/singapore-antitrustjapan-idUSL3N0OC0OY20140528

Singapore's anti-trust regulator fined three Japanese manufacturers S\$9.3 million (\$7.42 million) on Tuesday for taking part in a ball bearing pricing cartel, the latest move in a global investigation of price-fixing by car parts makers.NTN Corp was fined S\$455,652.

∂ Ethics

20 March 2014

200 millions d'euros d'amende, mais pas d'impact sur les résultats pour NTN

http://www.ledauphine.com/hautesavoie/2014/03/20/200-millions-d-euros-d-amende-maispas-d-impact-sur-les-resultats-pour-ntn

Suite à l'annonce de l'amende record, infligée par la commission européenne aux fabricants de roulements automobiles, pour une entente illicite sur les prix de vente, la société Japonaise NTN, qui contrôle la filiale française NTN-SNR, installée à Annecy, a publié un communiqué indiquant qu'il n'y avait "pas de révision des prévisions de bénéfices".

A Ethics

 \rightarrow No score impact

ightarrow No score impact

12 November 2019

Company identified on sanction and/or watchlist records from Compliance Database null

Iran Connect. Historical records: EU European Commission – Competition Antitrust Cases.

ightarrow No score impact

→ No score impact

Specific comments



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