IMDS GUIDELINES FOR SUPPLIERS

INTRODUCTION

3	07.01.2022	IMDS Compliance Team	4, 6 4, 8, 9 all	Bailment part changed to Customer Directed Supplier products, process/language edited, New requirements added (SCIP, Recyclate, Polymeric parts marking) content updated
2	11/05/2018	IMDS Compliance Team	3 4 5 6 8 10	Purpose modified New definition added IMDS contact person background added Materials and Bailment parts process update Non-compliance chapter added Reference documents deleted
1	05/05/2017	IMDS Compliance Team	8	Responsibility matrix updated
Rev.	**Date**	**Department / Producer**	**Page(s) / Chapter(s)**	**Modification notes**

Changes related to the latest revision will be identified in blue.

	Department	**Date**
Producer	Material Compliance	17.01.2022
Approval Process Owner	Material Compliance Manager	17.01.2022
Approver Management System	QM	01.02.2022
Approver Management Board (Global Procedures and Policies only)	-	

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1. PURPOSE

This standard functions to achieve efficient, timely, current, and accurate reporting and management of product compliance data. VC wants to ensure that suppliers structure their product compliance reporting processes in such a way, so that it is in line with VC quality requirements and data can be utilized to verify relevant legal and customer specific compliance requirements.

IMDS is a part of the VC supplier PPAP and as it is described in VC standard contracts, it is compulsory for the supplier to provide IMDS reporting free of charge.

2. SCOPE

This standard applies to all suppliers and their respective products supplied to all sites of Vibracoustic facilities worldwide. This standard is not applicable for VC inter-company supplied products.

This OPI is for external use.

3. TERMS / DEFINITIONS / ABBREVIATIONS

3.1 Definitions

- **International Material Data System**

International Material Data System is a web-based tool of the automotive industry, utilized to communicate material composition data of products, in form of Material Data Sheets along the supply chain. The intended use of the data is in large to verify as well as manage product compliance, regarding legal and/or customer specific restricted or prohibited substance requirements. The use of the system is free for members of the respective supply chain, who can register their company and access the system via www.mdsystem.com.

- **Material Data Sheet**

Material Data Sheets describe products in their end state, as they will be contained in the finished vehicle. MDSs depict detailed material content as well as structure of supplied products.

- **Products**

Products as defined for this standard are all assemblies, components, semi-finished components, and materials utilized by VC and/or customers of VC.

- **IMDS Rules & Recommendations**

IMDS rules and recommendations describe the procedures as well as requirements that govern the use of IMDS and are identified with a three-digit number and in some case an alphanumeric extension (i.e. 001 or 001a). Current and previously valid versions of recommendations can be found via the help menu after logging into the IMDS.

- **Customer Specific Requirements**

These are requirements, which are in addition to or deviate from general requirements and are specific to VC and/or customers of VC.

- **Restricted Substances**

Substances, which are either prohibited, or their use and/or applications are restricted due to legal and/or customer specific requirements.

- **Carry Over Products**

These are products, which were intended and utilized in previous projects that are utilized again for new or different projects.

- **Customer Directed Supplier Products**

These are either assemblies, components, semi-finished components, or materials utilized in the production of VC-supplier or VC-customer products as a requirement directed by the customer. Customer Directed Supplier Products, as defined for this standard, include VC as the

- CDSP Supplier - VC products utilized by suppliers at the direction of VC
- CDSP Recipient - Supplier products utilized by VC at the direction of its customers

- **Recycle**

Raw materials generated from recycled products or materials and re-used in the manufacturing of new materials and are defined in two categories.

- Content of post-industrial/pre-consumer recyclate (see ISO 14021)
  Recyclate that has been diverted from the waste stream during a manufacturing process. Excluded is reutilization of materials, such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it (home scrap recycling)
- Content of post-consumer recyclate (see ISO 14021)
  Recyclate that has been generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

3.2 Abbreviations

APQP	-	Advanced Product Quality Planning
CAMDS	-	China Automotive Data System
CDSP	-	Customer Directed Supplier Product/Part
CM	-	Conflict Minerals
COP	-	Carry Over Products
CSR	-	Customer Specific Requirements
IMDS	-	International Material Data System
MDS	-	Material Data Sheets
PPAP	-	Production Part Approval Process
REC	-	IMDS Rules and Recommendations
RS	-	Restricted Substances
SC	-	IMDS Steering Committee, ILI Metals, Stahl und Eisen Liste
SVHC	-	Substances of Very High Concern
SCIP	-	Data System for SVHC in articles as such or in complex products according to EU Waste Framework Directive
SQA	-	Supplier Quality Assurance
VC MD	-	Vibracoustic Material Development
VC IMDS Team	-	vibracoustic@imds-team.com
VDA	-	Verein der Deutschen Automobilindustrie (German Association of the Automotive Industry)

4. PROCESS / METHOD / PROCEDURE

4.1 General IMDS Process

In addition to the material compliance reporting requirements described here, suppliers are required to adhere to all IMDS processes detailed in IMDS recommendations, legal and/or customer specific requirements. A detailed description of IMDS process requirements can be found in IMDS.

4.2 IMDS Account Settings

4.2.1 IMDS & REACH Contact Person

In compliance with IMDS REC 001, all MDSs submitted to VC must contain current/correct contact information for supplier IMDS as well as REACh contact person. IMDS/REACh contacts are utilized by VC IMDS team to contact suppliers about submitted MDSs and/or other material compliance issues.

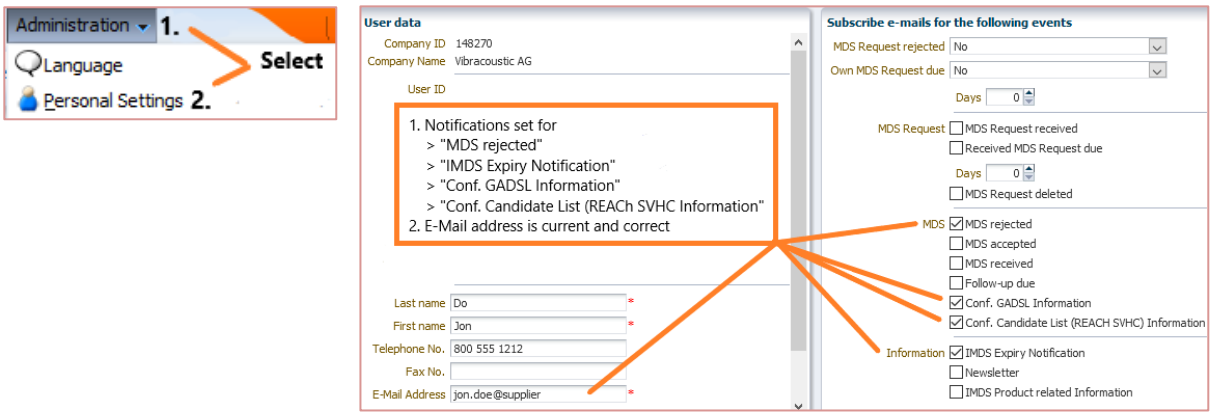
In the event of a contact person leaving supplier, who was previously used in an MDS submitted to VC, supplier should either

a) update the departing persons contact information with a new contact information in IMDS
b) submit a new version of the previously submitted MDS ID with new and valid contact person
c) designate a general default contact in IMDS

It is strongly recommended by VC to participate in an official IMDS training before starting to operate in IMDS. Any company submitting information in IMDS is liable for it and this information is likely to be used as evidence of material compliance.

4.2.2 User Notification Settings

To receive automated notification about the accepted/rejected status of MDSs sent to VC, relevant information about GADSL and/or REACh-SVHC substances, users must activate the corresponding check box in "Personal Settings" of the user account and ensure the e-mail address is correct.



User account settings should be set for each IMDS user, who submits material compliance data to VC.

4.3 MDS Submission Requirements

4.3.1 Time of MDS Submission

All suppliers are required to submit MDSs for all products supplied to VC as soon as possible, but no later than PPAP.

An MDS, which has been verified and accepted by VC IMDS Team, may be required prior to submitting PPAP documents to VC. Suppliers need to allow sufficient time for processing loops, due to possible MDS rejections by VC IMDS Team.

Published MDSs are not valid for PPAP documents, unless authorized by VC-SQA in advance and corresponding MDSs have been verified for correctness by VC IMDS Team. MDSs published by the IMDS Steering Committee are exempt from this restriction.

4.3.2 Rejected MDSs

Rejected MDSs must be corrected according to rejection reasons of VC IMDS team and re-submitted to VC within 5 days. Corrections must be performed by editing the rejected MDS ID / version and avoid creating a new version / ID due to a rejection.

4.3.3 MDS Structure and Content

Suppliers are required to submit MDSs which depict the physical structure and content of their respective products supplied to VC (e. g. components, semi-finished components, materials, assemblies).

All MDSs will be submitted to ~~our~~ Vibracoustic global IMDS account ID 148270.

4.3.3.1 MDS Content

It is imperative that suppliers do not create MDS content for sub-suppliers, as the data creator bares sole responsibility for legal and CSR RS requirements.

Source: IMDS REC 001

Rule/Guideline	Description
Rule 3.1.A	Material data must be passed along the supply chain (tier^{n} ➔ tier^{n-1} ➔ … ➔ automobile manufacturer).

4.3.3.2 Materials

For standard materials with VDA -and corresponding IMDS- classifications 1-4, MDSs published by the IMDS Steering Committee must be used. For modified standard materials in classifications 1 to 3, materials must contain following remarks/content and follow the described submission process:

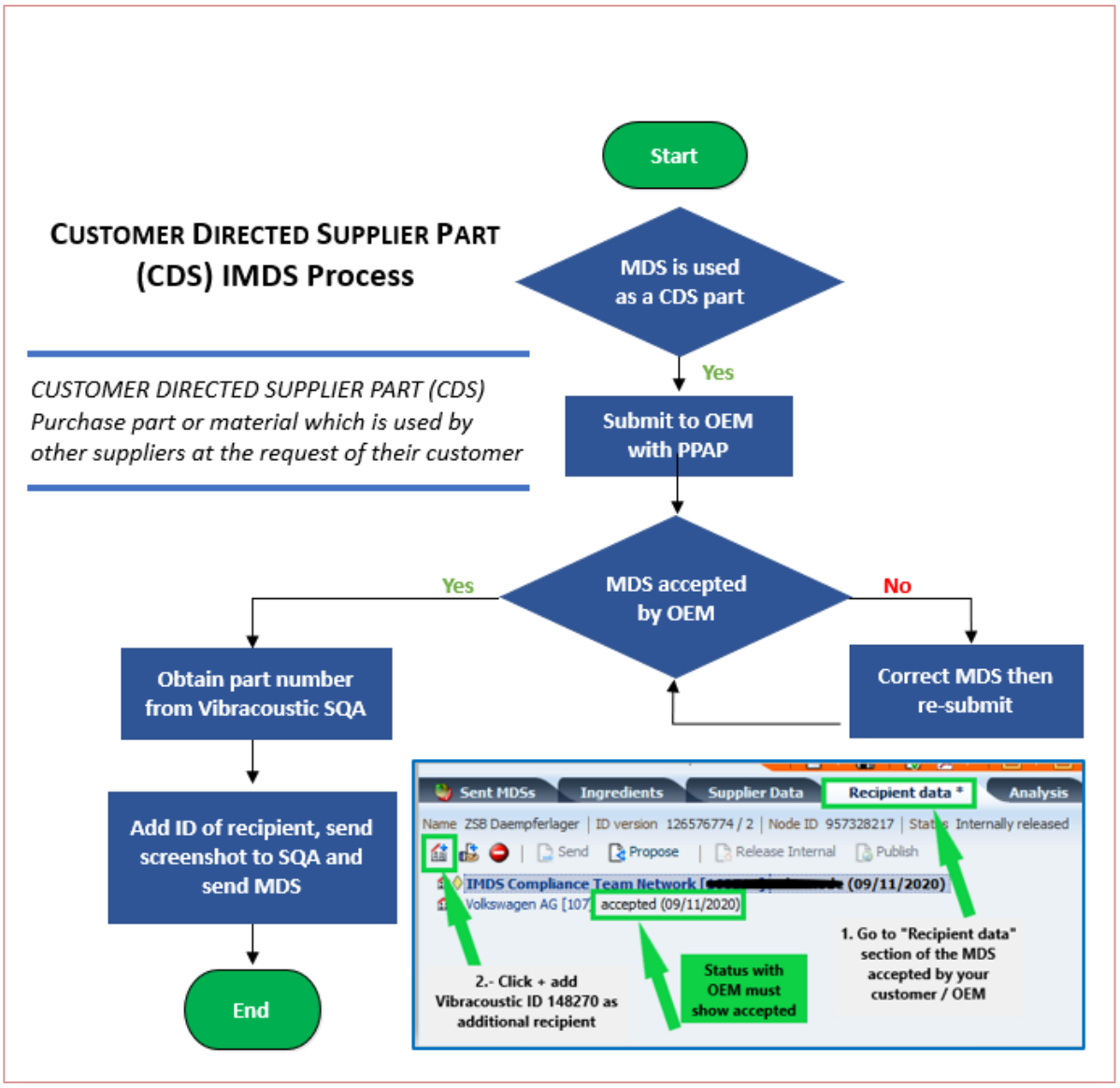
- ”mod.“ or „modified“ as part of the standard material number
- the MDS must contain applicable ”norms / standards” (e.g. DIN, EN, SAE, GB, JIS etc.)
- for standard materials modified to show reduced regulated substance content within a standard (e. g. <0.1% Pb in aluminum alloys), modified standard materials published by IMDS Committee must be used
- prior to submitting MDSs with modified standard materials, supplier should notify VC by submitting the corresponding material certificate to vc-data-check@imds-team.com

Material names must be according to REC 001 as well as Annex I Recommendation 001a, therefore material names of classifications 5-5.X must reflect their respective nomenclature.

All Material MDSs submitted to VC must contain a norm as defined in REC 001 for the corresponding classification (e.g. class 5.3. ISO 1629, 5.1.a/b ISO 1043 1-4)

4.3.3.3 Customer Directed Supplier Products

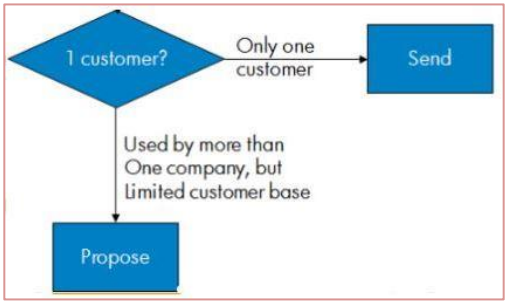
a) Suppliers that supply products to VC at the direction of supplier's OEM customer, must submit MDSs according to the process depicted in the following flow diagram



b) Suppliers who utilize VC products in manufacturing, at the direction of VC, must obtain the corresponding MDS from VC IMDS Team

4.3.4 Send vs. Propose

Suppliers should always utilize the send function of IMDS when submitting MDSs to VC, so the integrity of MDS versions according to change management can be ensured throughout the product life cycle. Propose may only be utilized for CDS parts or identical products supplied to more than just VC.



4.3.5 Change Management

Suppliers are required to maintain submitted MDS IDs according to change management requirements specified in Recommendation 001, as well as special requests by VC and update content accordingly.

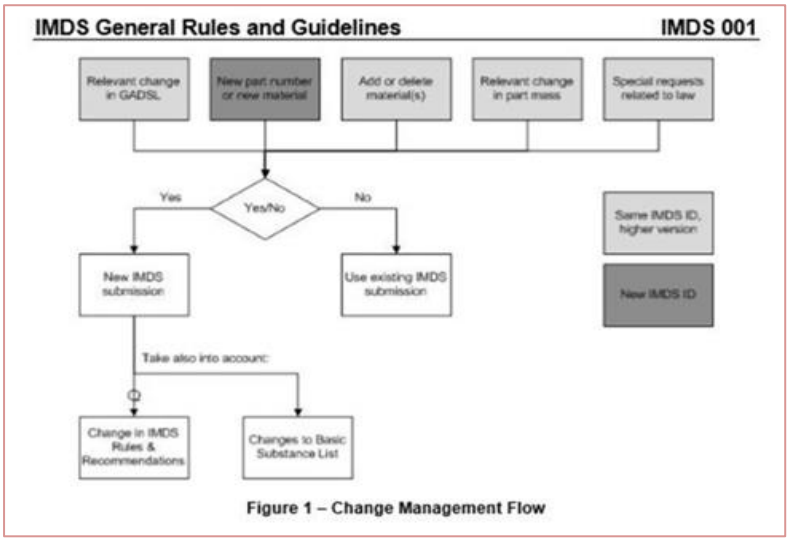


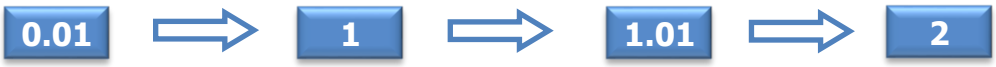
Figure 1 – Change Management Flow

4.3.5.1 Additional MDS Update Requirements

An updated version of previously submitted MDSs may also be required, if supplier products are utilized as COPs by VC, content is otherwise outdated or suboptimal, so that material compliance with current IMDS as well as legal requirements and CSR can be assured.

4.3.5.2 MDS Version Control

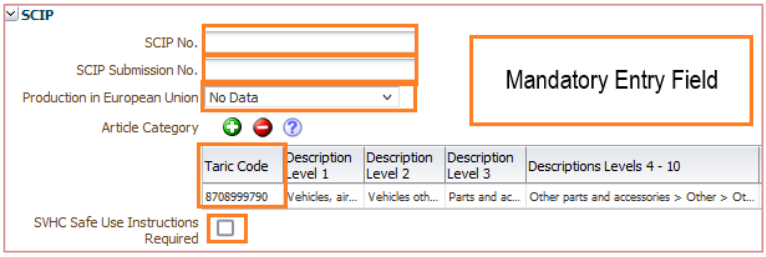
The MDS version system serves to document material compliance throughout the product life cycle. Therefore, new versions of previously submitted MDSs should only be submitted according to change management requirements specified in REC 001, or as requested by VC, and must reflect physical changes to products.



4.3.6 Additional Mandatory Entry Requirements

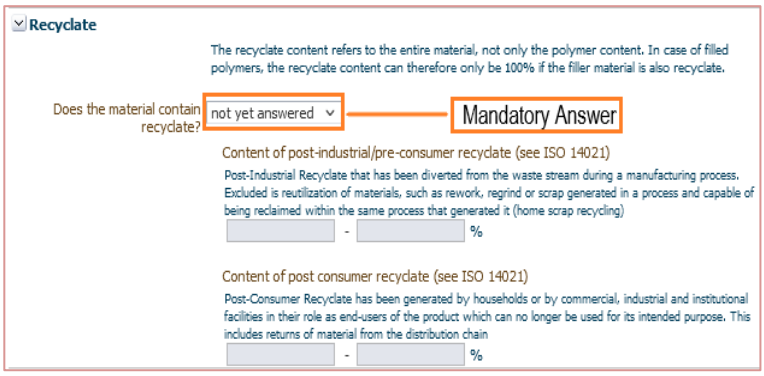
4.3.6.1 SCIP

These entries must be completed accordingly if the supplier MDS contains SCIP-SVHC.



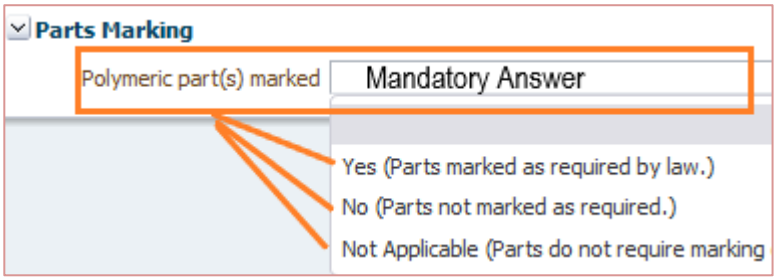
4.3.6.2 Recyclate

The question must always be answered with yes or no, according to the recyclate content



4.3.6.3 Polymeric Parts Marking

The question must always be answered and according to the recyclate content



4.4 CAMDS

As VC serves several customers in China, material compliance reporting may also be required in CAMDS. All processes described in this standard also apply for reporting in CAMDS, so long as they do not stand in conflict with CAMDS terms of use.

4.5 Additional Product Compliance Reporting

Some legal and CSR may require reporting in additional tools and or formats (i. e. CM reporting)

4.6 Non-Compliance

In case that the supplier is not able to provide a compliant IMDS entry or that a material compliance violation is found in the IMDS information submitted to VC, escalation in the Vibracoustic organization will be initiated as follows:

- Level 1: Supplier MC Meeting (including an action plan)
- Level 2: MC-Support (VC/external support required to solve issues. All costs charged to supplier)
- New Business Hold (NBH)

The supplier shall submit the action plan three business working days in advance so that all participants can be prepared for the meeting. As part of the action plan the supplier will be asked to take an official IMDS training and provide with evidence to VC in the period of the next three months.

In addition, IMDS compliance is tracked in our Supplier Management Data Base. The supplier will be tagged as IMDS non-compliant and this information will be considered for the next supplier evaluation process.

5. RESPONSIBILITIES

List the actions and responsibilities according to the RACI* chart logic, including level of responsibility. Please include a flow chart presentation of the respective responsibilities.

* **R**esponsible: Process owner, responsible to carry out the business process (implementation, execution)
Accountable: Approver, responsible for the result of the business process (objectives, design, monitoring)
Consulted: Experts; two-way communication
Informed: Persons that need to be kept up to date; one-way communication

Task /Function	VC MD	Supplier	VC IMDS Team *	SCM	Material Compliance Management
Create IMDS entries for VC products			R		A
Create Rubber Compounds in IMDS	R, A		I		C
Create supplier components in IMDS		R	I	A	C
Approval supplier entries in IMDS	C	I	R, A	I	C

*VC IMDS Team: vibracoustic@imds-team.com

6. APPENDIX / ENCLOSURES

Additional information, notes, examples and forms which have to be used can be listed in the appendix.

No.	Type of Document	Title/Description	Enclosure
1	Global Procedure	Quality Assurance Measures for Procurement of Purchased Parts	GP-01-7.4-0007
2	Global Procedure	Logistics Requirements for Suppliers	GP-01-7.4-0009
5		General Framework Agreement	
6	Form	Supplier Self-Assessment	FO-01-7.4-0056

7. FURTHER REFERENCE DOCUMENTS

7.1 Valid Supporting Documents

- General purchasing terms and conditions of VC purchase.

- Valid Scheduling Agreement with VC
- GADSL (Global Automotive Declarable Substance List; http://www.gadsl.org)
- Renault BGO List (Renault list of declarable substances)
- IMDS User Manual and all additional recommendations from steering committee; https://public.mdsystem.com/de/web/imds-public-pages/reading/
- ISO 1043 (Plastics – Symbols and abbreviated terms)
- ISO 1629 (Rubbers and lattices – Nomenclature)
- ISO 18064 (Thermoplastic elastomers – Nomenclature and abbreviated terms)
- ISO 9000 (Quality management systems – Fundamentals and vocabulary)
- VDA Vol. 2 (Quality management in the automotive industry – Quality assurance of supplies)
- VDA 231-106 (Material classification in motor vehicle construction – structure and nomenclature)
- other material-related international standards
- other OEM substance standards

Please contact your SQA for questions regarding this standard

8. DOCUMENTATION

Vibracoustic will keep this procedure on file.

In case of a revision the latest edition will be kept for at least 3 years after revision.