IMDS Manual for suppliers

Group Quality Services

Rev.	*Date*	*Created by*	*Date*	*Proved by*	*Date*	*Released by*	*Date*
00	26.03.2014	imds profesional	28.08.2013	Meier Christina Anna	01.03.2014	Rösl Franz	17.03.3014

Rev.	*Date*	*Changed by*	*Date*	*Proved by*	*Date*	*Released by*	*Date*
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1 Introduction

This Manual instructs suppliers how to report and submit Material Data Sheets (MDS) to GRAMMER within the International Material Data System (IMDS).

This document describes the basic requirements for the creation and submission of MDS's describing components, semi-finished components and materials. Following these requirements will support the entry of high quality and consistent data which is needed to fulfil applicable legal as well as OEM requirements.

All GRAMMER suppliers are required to submit MDS's for components, semi-components and materials, which they supply to Grammer.

2 Purpose

IMDS is a collective, computer-based material data system used by automotive OEM's to manage environmentally relevant aspects of the materials used in vehicles. Through this system, the automotive industry is able to reconstruct the complete material flow. It is the data creator's responsibility to ensure that requirements are passed downstream in the supply chain to assure that compliance and data reporting of the material formulation is accurate.

According to **GRAMMER General Terms and Conditions of Purchasing** suppliers are obliged to submit MDS's for the components, semi-components and materials, which they supply, via the IMDS.

MDS's will be evaluated and subsequently accepted or rejected based upon GRAMMER requirements, current IMDS recommendations as well as legal requirements. It is therefore necessary that you are familiar and understand current IMDS, legal, as well as GRAMMER requirements.

3 IMDS Rules and Guidelines

Current IMDS Rules and Guidelines can be found at the public pages of the IMDS-system at www.mdsystem.com

4 Prohibited and declarable basic substances

Prohibited and declarable substances, when used in materials and components for the automotive industry, are of concern to human health, environmental safety and recycling.

The GADSL is a result of a year long global effort of representatives from the automotive, automotive parts supplier (tier supplier) and chemical/plastics industries. Further restrictions are defined in the Annex II (ELV 2000/53/EC).

The names of basic substances that are declarable according to GADSL appear in blue letters. The names of basic substances that are prohibited according to GADSL, appear in red letters. The names of basic substances that are SVHCs (Substances of Very High Concern) according to the European chemical regulation REACH are underlined.

Please note that declarable and prohibited substances and their concentration have to be declared in a manner that compliance to legal requirements can be evaluated.

- ELV 2000/53/EC and whose Annex II
- GADSL (www.gadsl.org)
- REACH
- Law of Conflict Minerals: Dodd-Frank Act, USA

The currently valid legal regulations can be looked up on the internet here:
"Access to European Union Law" http://eur-lex.europa.eu

It's important to note that legal requirements and the above-mentioned documents are updated regularly. Therefore, suppliers are required to use the latest versions when material data sheets are reported.

5 Submission of MDS

An accepted MDS is necessary prior to all PSW (Part Submission Warrant) according to VDA Volume 2 respectively QS 9000 submitted to GRAMMER.

All MDS have to be in compliance with current IMDS-Recommendations at the time of your PSW or at the time of GRAMMER customer PSW.

Please follow further information given in GRAMMER supplier guideline for product materials (M_016_001) chapter 4.8.2 "Initial part with PSW" and 4.8.5 "IMDS-Data".

6 General Reporting

The IMDS flow of MDSs is initiated when materials become introduced for the first time into the GRAMMER supply chain. The flow of data through IMDS using companies must reflect the flow of materials and components through the automotive supply chain. It is the GRAMMER supplier responsibility to ensure that requirements are passed downstream in the supply chain to assure that compliance and data reporting of the material formulation is accurate. Please consider that in general, all components and materials being used throughout the supply chain have to be disclosed.

7 IMDS Change Management

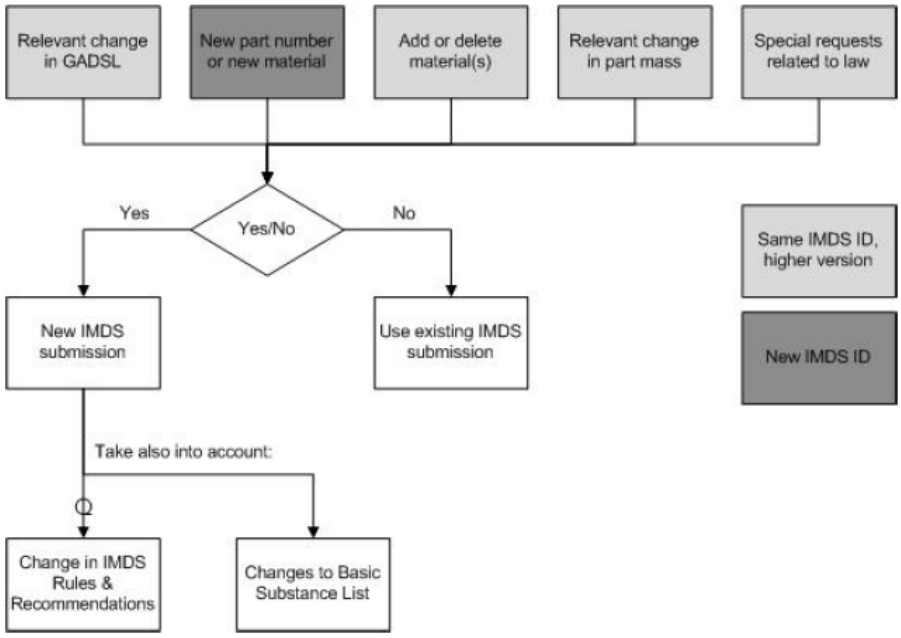
Note: The IMDS recommendation 001 requires the adherence of the following topics.

Please consider that a new GRAMMER part number requires a new MDS (new IMDS ID) unless suppliers are informed otherwise by GRAMMER. Example of a new part number 7654321-A.

The same GRAMMER part number with updated content requires a new MDS version (same IMDS ID, higher version). Example: part number change from 1234567-A to new index 1234567-B

IMDS-ID is composed of the (IMDS-ID / Version), for example: 123456789/1

Note: All valid quality assurance guidelines (example: VDA Vol. 2, QS 9000 / PPAP) are not made invalid by the following rules



Source: IMDS Recommendation 001

7.1 Relevant change in GADSL

When there is a change to the GADSL all MDSs that have a joker/wildcard in their tree structure have to be reviewed to determine whether the substance that the joker/wildcard replaces is now declarable or prohibited. All substances marked as confidential have to undergo the same review to identify if any confidential substance is now declarable or prohibited. Should that be the case, a revised submission with a full non confidential disclosure of the declarable or prohibited substance is required by the date in the legislation. If no date is given or the date is longer than 6 months, the resubmission has to occur no later than 6 months from the publication date of the updated GADSL.

7.2 New part number or new material

When a new part or material is introduced to GRAMMER for the first time, a new MDS (new IMDS ID) has to be created if the part or material is also new on the supplier side. If the part or material already exists on the supplier side, the supplier may add GRAMMER as a new recipient to the latest MDS version.

7.3 Add or delete materials(s)

The addition of any new material(s) or the elimination of any already reported material(s) contained in a part requires the revision and resubmission of the corresponding MDS to GRAMMER.

7.4 Relevant change in part mass

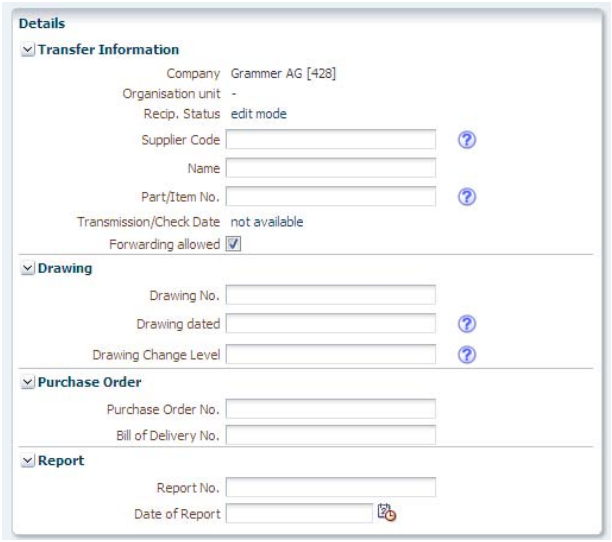
A change in mass of a part exceeding the allowed deviation listed on the production part drawing or in customer requirements requires the revision and resubmission of the corresponding MDS. Small changes made over a period of time may accumulate to be significant, and, in that case, a resubmission of the MDS is required. GRAMMER may determine the significance of the change according to Quality Management Guidelines.

7.5 Previously Submitted MDS’s

Suppliers have to also update previously submitted MDS’s, if requested by GRAMMER. These components are generally re-used in new projects, which require a current declaration, and are considered carry over parts (COP). Please note that the most recent Rules & Guidelines have to be adhered.

8 GRAMMER MDS-Recipient information

The following formal requirements have to be fulfilled in order to guarantee the correct MDS submission to GRAMMER into the IMDS system. The required MDS-Recipient information has to be specified into the fields –see below- when sending or proposing the MDS. Please see further information regarding GRAMMER recipient information below.



8.1 Part number

Please verify the correct part number format for GRAMMER. The part number has seven numeric digits without spaces, symbols or letters. The part number is followed by an index, which is “01” for prototypes and a single letter for serial parts:

Example: Serial part 1234567-A and for preliminary MDS during the prototype phase 1234567-01

8.2 Part description

The MDS name for components, semi-components, and materials have to be descriptive and compliant with GRAMMER specifications. The component name has to match the description of your PSW/PPAP. The language of the IMDS is English; therefore, names have to be in English, adding German in addition is optional.

8.3 Drawing Number and Drawing Chance Level

Filling in Drawing No. and Drawing Chance Level is optional

8.4 Supplier code

The DUNS (Data Universal Numbering System) has to be filled in the appropriate field supplier code.

8.5 Forwarding allowed

Ensure that forwarding of the MDS is allowed.

The supplier has to allow that GRAMMER can forward MDSs to their customers. That is necessary e.g.in case of directed OEM suppliers.

9 Recipient identification number

Each company is assigned a unique identification number from HP. For GRAMMER it is the company ID below:

IMDS Company name	IMDS Company-ID
GRAMMER AG	428

10 Contact

10.1 Contact supplier

The contact person have to be current in IMDS-date (name, phone number, email address).

10.2 Contact GRAMMER

Questions about IMDS should be addressed to imds@grammer.com

11 Applicable documents

GRAMMER supplier guideline for production materials	M_016_001

12 Changes