

### 0.1 Change record

Contents	Processed by	Revision Index
Modified structure – all chapters not mentioned in this change record are unchanged in content but only re-structured		
Complete restructuring	Global IMDS Supplier Service Team	09/2023
Update chapter 3.5. Polymeric Parts Marking	Global IMDS Supplier Service Team	11/2023
Added chapters 3.10. Non-standardized MDSs published by IMDS Committee 3.11. Error for editable references to hidden data 3.12. IMDS support the Biocidal Product Regulation	Global IMDS Supplier Service Team	10/2024
Updated Chapter 1.1. New submission of material datasheet		
Added chapters 3.13. IMDS supports reporting of the MCCP substances after the new Release 15 3.14 EU Deforestation Regulation (EUDR) 3.15. Product Carbon Footprint (PCF) and new IMDS Rec. 027	Global IMDS Supplier Service Team	11/2025
Updated chapters  1. General notes on creating material datasheets  1.1. New submission of material datasheet  3.4. Recyclate information  3.6. Application code  3.12. IMDS support the Biocidal Product Regulation  6. Co-applicable Documents		

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#### 0.2 Scope

The IMDS Guideline for Suppliers (IGS) is valid for all supplied parts to the global KOSTAL automotive business units. For parts supplied to business units KOSTAL Industry and KKS, limitations could be agreed between these business units and suppliers. Material datasheets must be provided for all products delivered to KOSTAL.

The IGS is published in English language only. Due to the high maintenance effort, this document is not translated into any other national languages of the suppliers by KOSTAL.



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### 1. General notes on creating material datasheets

This information sheet summarizes the specific requirements of KOSTAL for creating provisional and final material datasheets in the International Material Datasheet System (IMDS) and provides notes on how to create them correctly. The legal stipulations, as well as general regulations for creating material datasheets as set out in the IMDS recommendations, are not affected by this present document.

Material datasheets are essential in order to comply with legal regulations and documentation requirements. The lack of accepted datasheets may, for example, threaten the approval of vehicles. By the terms of KOSTAL's purchasing conditions manufacturers are obliged to provide KOSTAL material datasheets via the IMDS. Where datasheets are provided via the IMDS there is no requirement for material datasheets to be provided in paper form. Material datasheet are also required for spares and replacement parts.

ISIR/PPAP and IMDS submissions are required in the event of any changes. During the delivery process, suppliers must regularly review their IMDS submissions to ensure that all regulated substances in their products are properly declared, and promptly update the IMDS in case of any changes.

As of August 2025, the International Material Data System (IMDS) has extended its scope to include electrical and electronic components. The updated IMDS Terms of Use also permit reporting to non-automotive customers and recognize the participation of new OEMs within the system.

KOSTAL encourages all suppliers, including those providing non-automotive parts, to submit their material data via the IMDS platform for material data submission. This ensures data consistency, transparency, and compliance with current and future regulatory requirements across all KOSTAL product lines.

All KOSTAL suppliers are required to ensure that the materials and components they provide fully comply with applicable substance regulations (e.g., REACH, RoHS, ELV, POP, PFAS, etc.). Suppliers must be able to confirm that:

- Their supplied parts remain compliant with all regulated substance requirements.
- Any substances previously declared as confidential or represented by wildcard entries are disclosed in a timely manner whenever regulatory updates or customer requirements demand it.
- The validity and ongoing compliance of all supplied materials are maintained throughout the product lifecycle, including obligations related to spare parts.
- IMDS and SCIP data are updated without delay following the introduction of new or amended legislation affecting material content or declaration requirements.

Failure to comply with these obligations may result in rejection of the submitted MDS and escalation within KOSTAL's supplier quality processes.

As stated in the supplier information note dated 26 February 2016 KOSTAL reserves the right to submit parts for chemical analysis if material datasheets are not provided at the appropriate time and charge the costs to the respective supplier. To verify IMDS data submitted by the supplier, KOSTAL will carry out random laboratory chemical analysis of parts.

Should the analysis indicate a non-compliance with the GADSL, KOSTAL reserves the right to invoice the supplier for all costs incurred in connection with the analysis, as well as any additional expenses arising from the specific case.

KOSTAL reserves the right to charge the supplier the cost for multiple revisions of the same MDS in case of necessary rejections. KOSTAL will hold suppliers liable for damages caused to KOSTAL by non-compliant material data sheets.

The supplier commits to taking full responsibility for compliance with all applicable legal requirements and undertakes to update the Material Data Sheet (MDS) without further request and in a timely manner in the event of any changes.

As KOSTAL does not have any influence on the decisions of the IMDS Steering Committee, the collaboration of the suppliers in the implementation of all new IMDS rules is mandatory.



#### 1.1. New submission of material datasheet

As of supplier nomination, provisional datasheets (see item 1.4) or final material datasheets must be sent to KOSTAL. If final datasheets are sent to KOSTAL at an early stage prior to the sampling, it is not necessary to prepare provisional datasheets.

Final IMDS data have to be submitted min. 8 weeks prior to the ISIR/PPAP submission date. Sampling will not be processed without an approved MDS.

Please ensure that all Material Data Sheets (MDS) are released internally before submitting them to KOSTAL via the "Send MDS" or "Propose MDS" functions. Internal release is a mandatory requirement and must be completed prior to submission.

MDS sent with the status edit mode / handshake mode is not acceptable.

Rejected material datasheets should be processed immediately to cover the reason for rejection and returned. Please cancel rejected material datasheets which will not be used again, or where already accepted versions are available. The accepted datasheets are not deleted by this action.

### 1.2. Revising material datasheets

If the weight or material constituents of the product change after a material datasheet has been created and sent, so that the details are no longer within the tolerances stated in the original material datasheet, the material datasheet must be revised.

If a material datasheet is revised without a change in the part number, please do not generate a copy with a new IMDS ID. Instead, please use the option "Create new version".

Whenever "hidden" or "deactivated" data is referenced in editable MDSs (e.g. inactive substances, standard material or application code), the creator needs to replace it with a valid one creating a new version. This error will not appear in data of legacy spare parts.

If the datasheet is older than 10 years, a new version of the MDS/Module has to be created. If the change level of a part number does not include a change to the material constituents or weight, a new material datasheet is not required.

#### 1.3. Extent of deliveries

If several parts are included in a sample submission in a single delivery, a material datasheet for the complete delivery must be sent to KOSTAL. Please state the ID and version of this data sheet in the initial sample inspection report. If individual items in the delivery have KOSTAL part numbers, material data sheets must also be drawn up for these.

#### 1.4. Preliminary material datasheets

Recommendation 023 forms the basis for drawing up provisional material data sheets. Suppliers must provide these to KOSTAL without being requested. Unlike the final material data sheets, provisional data sheets may provide incomplete information on materials. With this exception, the requirements regarding accuracy, completeness and guarantees for final data sheets also apply to all other information in the provisional data sheets. Incomplete data sheets must be clearly identified by the term "development sample submission".

This identification does not mean that a development part or prototype, etc. is being submitted as a sample. It merely indicates that the material data sheet was created while the product was in its development phase and the details regarding materials are not yet finalized. A material data sheet is not required for development parts, prototypes or handmade samples!

Prohibited constituents and those requiring declaration to GADSL / GS93008 must be stated. Conformance of the parts with legal requirements must be ensured.

If material data sheets are drawn up as provisional documents, the "ProtMat" materials issued by the IMDS committee (Recommendation 023) should be used at the points where the materials are not yet finally determined.

KOSTAL prefers data sheets to be provided as final material data sheets – see section 1.1.

Provisional material data sheets cannot be used for initial sample submissions.



#### 1.5. SCIP database by ECHA

All IMDS MDS must contain the SCIP dossier number.

For each submitted MDS, the supplier is requested to indicate the information for the use of SVHCs in a concentration above 0.1% weight by weight (w/w). This must be done by entering the SCIP dossier no. in the IMDS submissions.

### 2. Specific requirements

#### 2.1. Part number / item number

For new items this is an 8-digit reference (existing items may have a 14-digit reference). The 14-digit reference is taken from the SAP purchase order which consists of the part number or item number of the drawing and a 3-digit KOSTAL internal key. Any separate letters or numbers following this are omitted when making an entry in the IMDS. e.g., part number / item number 12345678; 12345678901234 (see Fig 1, item 2).

For catalogue parts KOSTAL material number out of the order form may be entered here. Any separate letters or numbers following this are omitted when making an entry in the IMDS. e.g., part number / item number 12345678; 12345678901234 (see Fig 1, item 2).

#### 2.2. IMDS Company / Organisation ID

The IMDS Company ID / organization unit for all production plants is KOSTAL Automobil Elektrik GmbH & Co. KG [149384].

#### 2.3. Specific requirements for drawing information

The following formal requirements must be met, in order to ensure the alignment of essential data in KOSTAL's internal systems. The data required must be entered in receiver-specific fields in the form specified later in this document when sending or making proposals regarding material data sheets - see Fig. 1

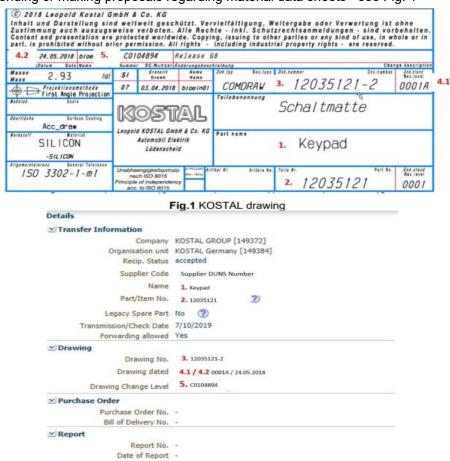


Fig.2 Recipient Data



#### 2.3.1. Material identification / description

This must be the same as on the KOSTAL drawing - see Fig. 1, item 1.

For catalogue parts this must be the material identification on the datasheet of the manufacturer.

#### 2.3.2. Drawing number

For KOSTAL designed parts, the KOSTAL document number must be entered here, .e.g. 12345678-2 (see Fig. 1; item. 3).

For catalogue parts, datasheet number may be entered here.

#### 2.3.3. Drawing date

For KOSTAL designed parts, the Rev.-level and the drawing date covering the material which has been ordered must be entered in this field.

Example: Rev. - level / date 0001A / 24.05.2018 (see Fig. 1; items 4.1 and 4.2).

For catalogue parts datasheets Rev.-level and date covering the material which has been ordered must be entered in this field.

#### 2.3.4. Drawing change level

For KOSTAL designed parts, the change "EC" number shown in the order and drawing must be entered in the "drawing change level" field. This is an 8-character combination of letters and numbers - see Fig. 1 EC-Number: for example C0104894 (see Fig. 1, item 5).

For catalogue parts, no input is necessary.

#### 2.4. Purchasing document / order number

KOSTAL purchasing document number must be entered in the "order number" field.

#### 2.5. Supplier code

The KOSTAL supplier must be entered in the relevant field. Please use your DUNS number of the production location and not the KOSTAL supplier number. e.g., DUNS: 12-345-6789.

### 3. Quality of material datasheet

#### All MDSs have to be submitted under current IMDS Recommendations

#### 3.1. Material name and classification

Please comply with the instructions in VDA 231-106 regarding the correct material classification. If the material is described in a public standard (steel, plastic, elastomer) then the material name according to this public standard must be entered.

All material data sheets (MDSs) containing deactivated classifications will be rejected. This refers to all submitted MDSs, no matter if the described part is new or a legacy part. Therefore, all suppliers must resubmit these MDSs by using a valid classification, which describes the material as detailed as possible.

#### 3.2. Standard materials / Published MDSs

Preferably, use the materials that are created by the IMDS Steering Committee.

In case IMDS Steering Committee MDS is used, the application code is responsibility of the data creator.

#### 3.3. Proportion and tolerances

When assessing a material data sheet regarding the individual constituent content it is assumed that the maximum amount of material stated by the supplier is present in the product.

Note: "It is not allowed to control the weight by multiplying the quantity of a component."



The deviation values are checked for each component node level and should not exceed the upper limits defined as percentages. The weight ranges and respective limits are shown in Fig.3.

Weight of component (X)	Max. deviation in %
X < 1g	100
1g ≤ X < 100g	10
100g ≤ X < 1kg	5
1kg ≤ X < 10kg	2
10kg ≤ X < 100kg	1
X ≥ 100kg	0.5

Fig.3 Weight limits

If components (such as unfinished parts) lose significant amount of weight through further processing (e.g., drilling, milling, etc.) these must be entered and called for as semi-finished products. Any compensation for the loss of weight by excessive deviations (from the measured to the calculated weight) is not acceptable.

Note that MDS must be submitted with the real weight of the part, confirmed via measuring process on the relevant scale.

#### 3.4. Recyclate information

With Release 14 chemical recycling and portions of bio-based materials will be possible to be declared via the wizard dialog in hierarchical manner. There are three types of recyclate:

- Mechanical recyclate for classifications 1-5, 7.1, 7.2
- Chemical recyclate for all classifications
- Bio-based content for classifications 5-6, 9.1-9.4

It is essential to state the proportion of recycled materials used in the case of non-5.x materials. For more information, please check IMDS Recommendation 25.

The question 'Does the material contain recyclate' must be answered with 'yes' or 'no' for **materials of any classification weighing more than 5g** when referenced in a component.

#### 3.5. Polymeric Parts Marking

Polymeric Parts Marking field is mandatory in case one or more child nodes contain:

- materials with the classifications 5.1.x, 5.4.x and 5.5.x that sum to a weight of more than 100g;
- materials with the classifications 5.2 and 5.3 that sum to a weight of more than 200g.

"No"- part not marked as required. MDS with **Polymeric Parts Marking section answered by "No" will be rejected**.

"Yes"- part marked as required on drawing.

"Not applicable"- part do not require marking due to specifications of weight, geometric restriction or surface requirements.

#### 3.6. Application code

The correct application code must be assigned, in case a material contains application-relevant substance. If the application code "Concentration within acceptable GADSL limits" is available, it must be used.

#### 3.7. Structure of MDS

Structure Mix is only allowed for non-article semi components or materials, which are added to a part or assembly without specific shape, surface or design (coating, lubricant or similar). When the structure mix used, the mandatory note must be "Applied to article as" as chosen relevant application as shown in Fig.4.





Fig.4. Structure mix

#### 3.8. Confidential substances

Highly confidential substances that are not declarable or prohibited according to GADSL, REACH SVHC list and do not require an application code should be marked as Confidential. Do not use Jokers/Wildcards. Only the wildcard "not yet specified" is allowed in preliminary data sheets.

#### 3.9. Declarable substances

Please note that if plastic materials are shown without details of the relevant additive, the submission will not be accepted.

The Global Automotive Declarable Substance List (GADSL) was updated with new PFAS including their reporting thresholds. All PFAS should be reported. Moreover, existing IMDS data needs to be reviewed and updated accordingly.

#### 3.10. Non-standardized MDSs published by IMDS Committee

The hiding of MDSs impacts some metals, surface treatments, some semi-finished products and labels. Please request the data of non-standard MDS from your supplier to ensure that the material content is declared entirely and in accordance to last requirements and update your data in IMDS system.

#### 3.11. Error for editable references to hidden data

There will be new error messages in case of direct references to hidden substances, standard MDSs or application codes in editable MDSs. In other words, hidden data must be replaced before releasing an MDS.

Note that with IMDS Release 14.2, some pseudo substances available in IMDS do not allow the correct identification of the required polymeric marking requirement and therefore, they will be hidden in IMDS. Therefore, IMDS IDs, which contain such substances are rejected by the customer.

#### 3.12. IMDS support the Biocidal Product Regulation

To fulfill regulatory duties within the EU as producer or importer, only active substances that are approved for the relevant product-type, or are in the approval process for the relevant product type, may be used. The use of delisted substances is not allowed at all. In each case, the assigned product type has to be taken into account.

The following <u>link</u> leads to the file indicating which Product Types can be selected for a BPR substance depending on the classification of the Material containing the substance.

If a classification does not allow any Product Types to be selected according to this file, the classification is considered not eligible for BPR. All materials created after IMDS Release 12 that use one of these classifications will not receive BPR regulatory information, even in case they contain a BPR substance.

When sending, proposing, or publishing an MDS for which regulatory information can be entered (including nodes and referenced Standard MDSs), an error message will be displayed in the check result in case regulatory information has not been entered (status "no reg. info. provided yet"). There are no such messages when releasing a Module or MDS internally.



If regulatory information is available but does not match the MDS's composition (status "incomplete"), a warning message is displayed instead. Regulatory information can still only be entered if at least one version of the MDS has been released.

For more information regarding IMDS functionality called "Chemistry Manager" see chapter 7 of the IMDS User Manual.

Chemistry manager allows companies to provide REACH Annex XIV Regulatory information, Biocide Product Regulation (BPR) and after Release 15 - the MCCP (medium-chain chlorinated paraffins) substances along the supply chain in a faster way without blocking the "classic" MDS data traffic and still maintaining the link between the added regulatory information and the related MDSs.

#### 3.13. IMDS supports reporting of the MCCP substances after the new Release 15

With the new Release 15 a new substance group is introduced for MCCP (medium-chain chlorinated paraffins).

Studies indicate that certain MCCPs are very persistent and very bioaccumulative (vPvB) or persistent, bioaccumulative, and toxic (PBT). Short-chain chlorinated paraffins (SCCPs) are listed as persistent organic pollutants (POPs Regulation) under the Stockholm Convention, and medium-chain chlorinated paraffins (MCCPs) are under consideration for similar listing.

MCCPs can be used as plasticisers in a number of paints and varnishes used on EEE.

A new regulation type for MCCP is made available in the regulation wizard (also known as the Chemistry Manager). This regulation type generally behaves the same way as other regulation types like BPR or REACH.

#### 3.14. EU Deforestation Regulation (EUDR)

The EUDR (EU Deforestation Regulation) is designed to ensure that products placed on the EU market do not contribute to deforestation or forest degradation.

Including EUDR fields within IMDS enhances traceability of raw materials, making it possible to verify that materials used in components are not linked to deforestation.

While EUDR is not yet directly integrated into IMDS, the connection comes through raw materials:

- ∘Rubber → tires, seals, hoses, gaskets;
- Leather (cattle-derived) → car seats, steering wheels, interiors;
- Timber/wood-based materials → decorative panels, interiors.

A new regulation type for EUDR is made available in the regulation wizard (or Chemistry Manager). This regulation type generally behaves the same way as other regulation types like BPR or REACH. More information on EUDR you can find on the link.

Please note that a new version of the IMDS ID is not required. This information will be transferred throughout the entire supply chain via the regulation wizard (sometimes referred to as Chemistry Manager).

#### 3.15. Product Carbon Footprint (PCF) and new IMDS Rec. 027

With the upcoming IMDS Release 15.0, PCF (Product Carbon Footprint) reporting was integrated into the IMDS system. To support this new feature, the new IMDS Recommendation 027 has been published and came into effect with Release 15.0. This Recommendation provides detailed guidelines on how to enter PCF data in IMDS, ensuring accurate and consistent reporting.

Carbon footprint information is split into two sections:

- Product carbon footprint, which is entered in the ingredients section and is based on the production site(s) where the product is manufactured.
- Transport carbon footprint, which is entered for each recipient of an MDS and represents the transportation of the product from a production site to a specific customer site.

Carbon footprint information for components is entered as "kg  $CO_2e$  / component", while for semi-components and materials the unit is "kg  $CO_2e$  / kg of material".



Like regulatory information, new versions of both product carbon footprint and transport carbon footprint information can be created without requiring a new version of the Module/MDS. However, contrary to regulatory information, carbon footprint information is assigned to individual versions of Modules/MDSs. While the information is transferred when creating a new version of a Module/MDS, different versions of the same Module/MDS do not share the same carbon footprint information.

No carbon footprint information is provided for Published Standard MDSs and unlike regulatory information, it is not possible to enter carbon footprint for references to such MDSs.

Carbon footprint information or the lack thereof should not be a reason for rejection of an MDS. For that reason, carbon footprint information only becomes visible in received MDSs once the MDS has been accepted.

In an accepted MDS, the recipient can see all transport carbon footprint information that has been assigned to their recipient entry.

In case, reporting of PCF is done in IMDS, the rules and guidelines of IMDS Rec. 027 apply, and all data fields deemed mandatory are to be filled.

Product Carbon Footprint (PCF) data in IMDS has separate versioning from the actual MDS to which it is attached so that the information can be revised without requiring resubmission.

The PCF data must be reviewed at least once per year and mandatorily updated when an increase by 5 % occurs in the reported values and in case of any changes in the PCF already declared data (see <u>Catena X PCF Rule book</u> for more information).

For more information regarding the Rules and Guidelines for Reporting of Product Carbon Footprint (PCF) see IMDS Rec. 027.

New versions of both product carbon footprint and transport carbon footprint information can be created without requiring a new version of the Module/MDS. However, contrary to regulatory information, carbon footprint information is assigned to individual versions of Modules/MDSs. While the information is transferred when creating a new version of a Module/MDS, different versions of the same Module/MDS do not share the same carbon footprint information.

Please note that IMDS provides additional fields for PCF and EUDR to facilitate the transfer of this information along the supply chain. While it is not mandatory currently, we kindly encourage you to include this data in the respective fields whenever available.

### 4. ISIR / PPAP

For the initial sample submission the IMDS ID with a version of a previously accepted material data sheet is essential. Please enter this number in the ISIR cover sheet - for example, IMDS ID 12345678.

Provisional / Preliminary material data sheets cannot be used for ISIR / PPAP submissions.

If an increase in the change issue number does not change the weight or the constituent make-up of the product you can use the IMDS ID and version of the latest data sheet already accepted when making the initial sample submission - see section 1.2. Otherwise, a new version of the material data sheet must be submitted.

#### 5. Contacts

For any questions/ concerns regarding IMDS data, please contact KOSTAL's Global IMDS Supplier Service Team at E-Mail: IMDS-SS@kostal.com



### 6. Co-applicable Documents

IMDS Recommendation (REC001-REC027),

IMDS Recommendation Annex I,

OEM Specific Requirements (Guidelines),

Global Automotive Declarable Substance List (GADSL),

ELV Directive Annex II,

Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH),

Biocidal Products Regulation (EU) No 528/2012 etc.