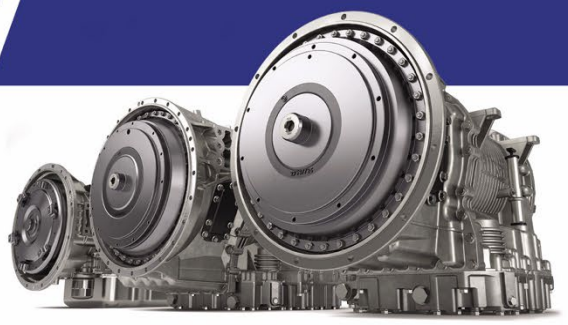
Allison Transmission®



IMDS Requirements

For Allison Transmission, Inc. Suppliers

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INTRODUCTION

Our mission at Allison Transmission, Inc. (ATI) to improve the way the world works demands that everything we do leads to a cleaner, healthier, safer environment. ATI's propulsion systems are subject to ever increasing market demand and legislation that creates challenging and complex compliance requirements.

In order for ATI to continue to sell products around the globe, we must be able to demonstrate our products are compliant with all applicable laws, regulations, and rules. To execute our mission, we need to know what is in our products. Depending on the business, market, and product, companies face different rules of product compliance. This IMDS Requirements User Manual ("Manual") is intended to inform you, our supplier, about the regulatory requirements of ATI products, about ATI's system for its suppliers to provide the necessary information, and what we require of you as a valued supplier of materials, parts, and components. ATI is not trying to mandate how you, as a business, comply with the relevant laws for your own products (if in scope) – if in doubt, please seek professional advice. Caution: IMDS (International Material Data System) was developed and is operated by EntServ Deutschland GmbH (legal successor of the EDS Operations Services GmbH), a DXC Technology company - subsequently called "DXC". DXC takes the IMDS ToU seriously. If you have any doubt regarding adherence to the ToU, contact DXC. The provisions contained herein do not limit in any way your liability regarding applicable legal and regulatory provisions. DXC's Terms of Use (TOU's) can be found here: https://public.mdsystem.com/documents/10906/16811/IMDS+ToU+5.1_final_2018.pdf

Rules such as GADSL, RoHS, REACH, and ELV require compliant supply chains. Suppliers of components for production, equipment, services, and consumption goods play a vital part in the development and production of ATI's products. A true holistic approach means that the ATI's commitment to environmental care must be reflected in our supplier network.

DEFINITIONS AND ACRONYMS

Article – An object which, during its production, is given a special shape, surface or design which determines its function to a greater degree than its chemical composition.

Basic Substance – Elements, compound chemicals and pseudo-substances which comprise all materials.

CE Marking – The CE marking means that the manufacturer or importer affirms the good's conformity with European health, safety, and environmental protection standards. It is not a quality indicator or a certification mark.

Homogeneous Material – Homogeneous means that there is a consistent material composition which cannot be separated mechanically into two or more different materials. Homogeneous materials are, for example, plastics, metals, alloys and coatings.

ILI Committee – Published and preferred datasheets that are available in IMDS for most metal standards.

Material – raw, non-functional substances (e.g., steel, glass, rubber, PVC) prior to manufacturing use.

Material Data Sheet – An element representing a component, semi-component, material, or entire product. Contains the item structure, internal contact, and customer information.

Mechanical Separation – It is generally possible to separate materials by means of cutting, trimming and abrasion.

Module – An element representing a component, semi-component, material, or entire product. Contains the item structure but no internal contact or customer information. Internal use only.

Part – Component / assembly with a fixed weight value; node name indicates specific part functionality within vehicle. For the purposes of this manual, part and component may be used interchangeably.

Semi-Component – A bulk part whose utilized weight value is specified by the customer, not supplier (electrical wire, casting blanks).

Standard Materials – Published by DXC or the IMDS/ILI Committee typically representing standard metals and alloys.

Acronyms:

ATI – Allison Transmission, Inc.
BSL – Basic Substance List
CAS - Chemical Abstracts Service
DXC – DXC Technology is an information technology services and consulting company
EC – European Community
ECHA - European Chemicals Agency
ELV – End of Life Vehicle Directive
EU – European Union
FAQ – Frequently Asked Question
FMD – Full Material Declaration
GADSL – Global Automotive Declarable Substance List
GASG – Global Automotive Stakeholder Group
HPE – Hewlett Packard Enterprise
IMDS – International Material Data System
MDS – Material Data Sheet
OEM – Original Equipment Manufacturer
PPAP – Production Part Approval Process
PVC - Polyvinyl chloride
REACH – Registration, Evaluation, Authorization, of Chemicals
RoHS – Restriction on Hazardous Substances

SCIP - Substances of Concern In articles as such or in complex objects (Products) database
SOC – Substance of Concern
SVHC – Substances of Very High Concern
ToU – Terms of Use
WFD – Waste Framework Directive

SUPPLIER OVERVIEW

ATI has chosen to use DXC's IMDS database as a tool for compliance. This Manual explains how the IMDS requirements need to be fulfilled for every part (current, new and modified) delivered to ATI's global manufacturing plants and customization centers. All IMDS questions should be directed to imds@allisontransmission.com. All IMDS submissions need to be submitted to ATI organization ID #**28623** at https://www.mdsystem.com. This is our only active account. At times, ATI may request a FMD to your IMDS inbox. Please monitor it regularly. While submitting the MDS, please include the ATI part number, part description, supplier ID number, weight, revision level and current contact information for the data to be accepted. ATI strongly recommends that its suppliers flow the requirements down to their respective supply bases. ATI may need to perform supplier audits and testing, as needed, depending on product risk. Failure to fulfil these compliance requirements may lead ATI to seek alternative solutions.

REGULATIONS DRIVING FULL MATERIAL DECLARATIONS

GLOBAL AUTOMOTIVE DECLARABLE SUBSTANCE LIST (GADSL)

GADSL covers declaration of certain information about substances relevant to parts and materials supplied by the supply chain to automobile manufacturers. The information is applicable to the use of these parts or materials in the production of a vehicle up to its usage and relevant to the vehicle's re-use or waste disposal.

The intent of GADSL is to become the company specific list for declaration of parts composition within the automotive industry. It provides a definitive list of substances requiring declaration with the target to minimize individual requirements and ensure cost-effective management of declaration practice along the complex supply chain. The scope is to cover declarable substances in the flow of information relevant to parts and materials supplied throughout the automotive value chain, from production to the end-of-life phase.

GADSL only covers substances that are expected to be present in a material or part that remains in the vehicle or part at point of sale. Declaration thresholds are defined by specific application of the substance in automotive parts. Any reportable substance below the declaration level does not have to be reported. These levels, unless otherwise indicated, are $\leq$ 0.1 g/100g (weight %) of homogeneous materials, not on the total content in the component or assembly.

Examples:

WITHIN THE SCOPE OF GADSL	NOT WITHIN SCOPE OF GADSL
Hexavalent chromium in the corrosion prevention coating of a fastener (a transmission part – also referred to as a "hard part".	Hexavalent chromium present on a part transfer pallet (since this is not vehicle associated). Packaging material for parts is out of scope of GADSL, because packaging material does not remain on the vehicle during use.

A synthetic base oil used in a prefilled transmission reservoir (since this material is present in the vehicle at the point of sale).	A nonylphenol ethoxylate used as a surfactant in a facility maintenance chemical (as it is not in the vehicle at the point of sale).
A cobalt compound remaining in the cured (dry) state of a transmission's paint.	A solvent initially present in paint, but which evaporates during the production process (as it is not in the vehicle at the point of sale).

P = Prohibited

A substance designated "P" is prohibited for all automotive uses in at least one region / market or may not exceed a regulated threshold limit for all automotive uses in at least one region/market.

D = Declarable

A substance designated "D" must be declared if it exceeds the defined threshold limits.

D/P = Declarable or Prohibited

A substance designated as "D/P" has both allowed uses and prohibited uses in at least one region / market.

Substances marked D/P and P must also be declared if they are present above the stipulated threshold (e.g. 0.1% in weight).

GADSL REASON CODES

Reason codes have been developed to explain why a substance has been included in GADSL. Each declarable substance will be listed with one of the following reason codes to facilitate dialog within the supply chain:

LR = Legally Regulated: A substance legally regulated because its use in a vehicle part or material poses a significant risk to health and or the environment.

FA = For Assessment: A substance projected to be regulated by government agencies, upon decision by the GASG Steering Committee.

FI = For Information: A substance tracked for information purposes only, upon decision by the GASG Steering Committee. After discussion at the GASG Steering Committee and on an exceptional basis, an automobile manufacturer may include an individual substance or family of substances on the list under this (FI) reason code.

LR, FA and FI substances should not be construed to mean that the substance is prohibited from being used in a vehicle part or is to be de-selected from use.

Substance families: If all members of a substance family are "D" or "P" the entry "all members" is listed after the family name. The entry "substance name, selected" means: This substance family refers to a limited list of single substances, which meet the criteria for being declarable or prohibited. In certain cases, substance families have the classification "D, except". This means that all substances within that family are declarable except those that are labeled with "P" (e.g., Polybrominated Diphenyl Ethers).

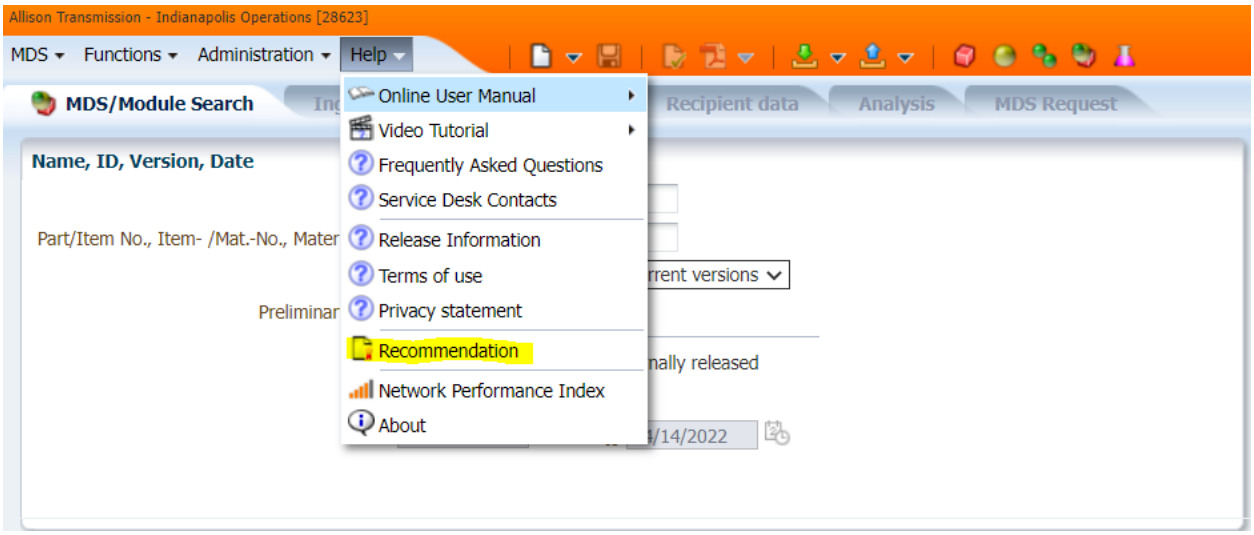
CAS numbers for individual substances of a chemical family or group on GADSL are listed in the Reference List which is part of GADSL. This list is available on the GADSL website http://www.gadsl.org. The sole purpose of this reference list is to facilitate communication and declaration relating to GADSL within the automotive supply chain to the automobile manufacturers.

The IMDS contains detailed information on materials and substances in automobile parts. IMDS Recommendations give instructions on how to report the presence of declarable substances in parts and materials. In addition, specific requirements of individual vehicle manufacturers can be found. GADSL is standard in IMDS. The complete

list of substances in IMDS is called the BSL. To simplify identification and reporting of GADSL-listed substances they are marked separately with D or P in IMDS System.

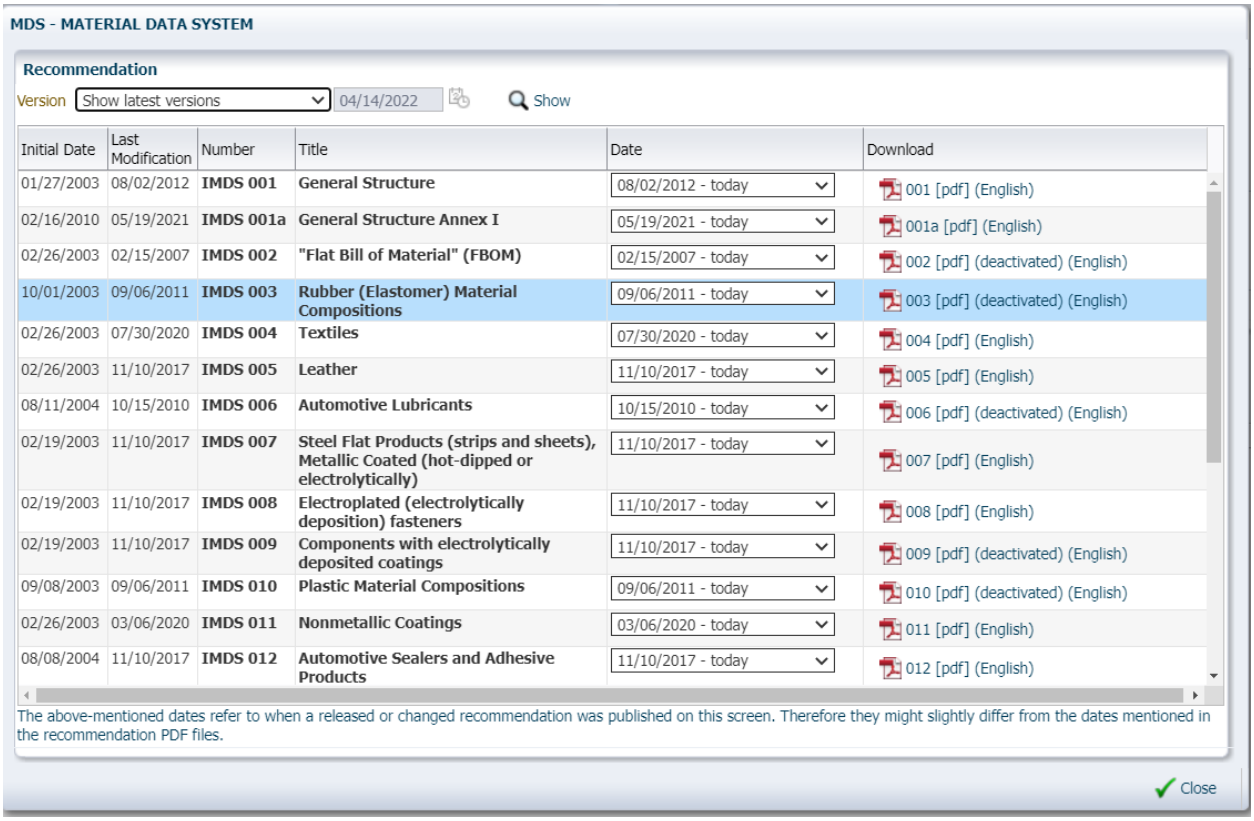
The IMDS Recommendations table can be found at https://www.mdsystem.com .

After logging in, navigate to the Help drop down and select Recommendation.



Download the applicable annexes or the latest revisions.

Recommendations can be found here:



Initial Date	Last Modification	Number	Title	Date	Download
01/27/2003	08/02/2012	**IMDS 001**	**General Structure**	08/02/2012 - today	001 [pdf] (English)
02/16/2010	05/19/2021	**IMDS 001a**	**General Structure Annex I**	05/19/2021 - today	001a [pdf] (English)
02/26/2003	02/15/2007	**IMDS 002**	**"Flat Bill of Material" (FBOM)**	02/15/2007 - today	002 [pdf] (deactivated) (English)
10/01/2003	09/06/2011	**IMDS 003**	**Rubber (Elastomer) Material Compositions**	09/06/2011 - today	003 [pdf] (deactivated) (English)
02/26/2003	07/30/2020	**IMDS 004**	**Textiles**	07/30/2020 - today	004 [pdf] (English)
02/26/2003	11/10/2017	**IMDS 005**	**Leather**	11/10/2017 - today	005 [pdf] (English)
08/11/2004	10/15/2010	**IMDS 006**	**Automotive Lubricants**	10/15/2010 - today	006 [pdf] (deactivated) (English)
02/19/2003	11/10/2017	**IMDS 007**	**Steel Flat Products (strips and sheets), Metallic Coated (hot-dipped or electrolytically)**	11/10/2017 - today	007 [pdf] (English)
02/19/2003	11/10/2017	**IMDS 008**	**Electroplated (electrolytically deposition) fasteners**	11/10/2017 - today	008 [pdf] (English)
02/19/2003	11/10/2017	**IMDS 009**	**Components with electrolytically deposited coatings**	11/10/2017 - today	009 [pdf] (deactivated) (English)
09/08/2003	09/06/2011	**IMDS 010**	**Plastic Material Compositions**	09/06/2011 - today	010 [pdf] (deactivated) (English)
02/26/2003	03/06/2020	**IMDS 011**	**Nonmetallic Coatings**	03/06/2020 - today	011 [pdf] (English)
08/08/2004	11/10/2017	**IMDS 012**	**Automotive Sealers and Adhesive Products**	11/10/2017 - today	012 [pdf] (English)

The above-mentioned dates refer to when a released or changed recommendation was published on this screen. Therefore they might slightly differ from the dates mentioned in the recommendation PDF files.

END OF LIFE VEHICLE DIRECTIVE (ELV)

ELV is an EU directive that restricts certain substances in the Automotive Industry's goal of reducing the environmental impact at the end of the vehicles useful life. Enforcement began September 18, 2000 (2000/53/EC) and set the stage for other product compliance regulations such as RoHS and REACH.

ELV is applicable to vehicle manufacturers that manufacture or import vehicles into the EU. ATI products must comply with ELV to meet our customers' requirements. As the burden of ELV compliance is on the manufacturers, the manufacturers agreed upon a common tool (IMDS) for which their supply base could provide their material declarations.

The current ELV directive may be found here:

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32000L0053

Current exemptions will be found in ANNEX II.

REGISTRATION, EVALUATION, AUTHORIZATION AND RESTRICTION OF CHEMICALS (REACH) & SUBSTANCES OF VERY HIGH CONCERN (SVHC)

REACH is EU legislation designed to protect human health and the environment. Enforcement began June 2007. REACH aims to monitor and restrict the movement of hazardous chemicals through the EU, including substances in preparation form and incorporated into articles. It replaces 40 years of old EU chemical legislations by compiling them into one.

The Candidate List continues to grow and currently has many SVHCs. SVHCs that are added to the Candidate List are those that are a candidate for elimination. These include carcinogens, mutagens, reproductive toxins, persistent, bio-accumulative toxins, very persistent and very bio-accumulative toxins, endocrine disruptors, and substances of equivalent concern.

REACH applies to EU legal entities, but requirements flow down the supply chain globally. REACH requirements apply to all industries and vary depending on the product (substance/material or article**).**

Registration – A substance must be registered with the ECHA, if the substance is intentionally released from an article > 1 ton per year.

Authorization – Banned substances, will need special authorization in order to continue to be allowed to be used in the EU.

Potential banned substances are taken from the Candidate List (aka: SVHC) list. (link below)

Companies using SVHCs may have Notification (to ECHA) and/or Communication (to Customers) of requirements depending on the amount of the SVHC.

It is critical that suppliers provide ATI an FMD regarding the amount of any SVHCs in their products so that the supply chain does not need to be re-surveyed every time a new SVHC is added to the Candidate list. This information is also needed to determine ATI or ATI Customers' reporting obligations.

The current list of SVHC's may be found here:

https://echa.europa.eu/candidate-list-table

WASTE FRAMEWORK DIRECTIVE (WFD) AND SUBSTANCE OF CONCERN IN ARTICLES (SCIP)

SCIP is the database for information on SOC in articles as such or in complex objects (Products) established under the WFD. Companies supplying articles containing SVHC on the Candidate List in a concentration above 0.1% weight by weight (w/w) on the EU market must submit information on these articles to the ECHA, beginning January 5, 2021.

The SCIP database ensures that the information on articles containing Candidate List substances is available throughout the whole lifecycle of products and materials, including the waste stage. The information in the database is then made available to waste operators and consumers.

The WFD's goal is to measure and address the adverse impacts of the generation and management of waste on the environment and human health, and for improving efficient use of resources which are crucial for the transition to a circular economy. ATI participates in this directive. The SCIP database has three main objectives:

1. Decrease the generation of waste containing hazardous substances by supporting the substitution of substances of concern in articles placed on the EU market.
2. Make information available to further improve waste treatment operations.
3. Allow authorities to monitor the use of substances of concern in articles and initiate appropriate actions over the whole lifecycle of articles, including at their waste stage.

A complete Candidate List of SVHC may be found here:

https://echa.europa.eu/candidate-list-table

RESTRICTION ON HAZARDOUS SUBSTANCES (ROHS)

RoHS is an EU legislation that restricts certain substances in electrical and electronic equipment with the goal of reducing the environmental impact of such equipment. Many ATI products are considered electrical and electronic equipment. Enforcement began July 1, 2006 (2002/95/EC). It was later revised June 8, 2011 (2011/65/EU) and enforcement began July 3, 2013.

Countries beyond the EU (China, Korea, India, etc.), have also adopted RoHS-like legislation. It is critical that suppliers provide ATI with up-to-date compliance information. New substances may be added to RoHS and exemptions expire, which may change the compliance status of your products.

RoHS requires CE Marking, a declaration of conformance, and technical documentation.

Common homogenous materials containing restricted substances:

1. Lead – Solders, termination coating, paints, pigment, PVC stabilizer
2. Cadmium – Coatings, solders, semiconductors, contacts, PVC stabilizers, pigments
3. Mercury – Fluorescent lamps, batteries, sensors, relays
4. Hexavalent Chromium – Coatings to prevent corrosion (on zinc, aluminum or in paints).
5. PBB, PBDE – Flame retardant in certain plastics
6. DEHP, BBP, DBP, DIBP – Plasticizers in certain plastics and cables

The latest version of RoHS may be found here:

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011L0065

RoHS exemptions have expiration dates and may be found here:

https://echa.europa.eu/en/web/guest/exemptions-art-4-restrictions-rohs

ATI APPROACH

ATI will accept FMDs using IMDS. IMDS facilitates the regulatory requirement for FMDs for the below listed regulations. You may access the IMDS site here: https://www.mdsystem.com

Regulation/List	IMDS	IMDS Comments
ELV	X	Included in GADSL, Tree Search (Exemptions, aka Applications)
GADSL	X	Tree Search, Where-Used
REACH SVHC	X	A2 (REACH Reg. Overview), Where-Used, Included in GADSL
REACH Annex XVII (Restriction)	X	Chemistry Manager, A2 (REACH Reg. Overview)
REACH Annex XIV (Authorization)	X	Chemistry Manager, A2 (REACH Reg. Overview), Tree Search, Where-Used
California Prop 65	X	Tree Search, Where-Used
Biocide Product Regulation (BPR)	X	Chemistry Manager, Tree Search, Where-Used, Included in GADSL
Conflict Minerals	X	Tree Search, Where-Used, CM Analyzer (if also have CDX Login)

SUPPLIER INFORMATION

Current Parts: Required Supplier MDS collection began 1/1/2022. If you have not submitted an MDS to ATI IMDS Organization ID #28623, please do so now.

New Parts: You should submit your material reporting to IMDS 4 weeks before the planned PPAP approval date. This timing highlights the need to start collecting substances data as soon as possible to be able to answer in time to meet the MDS request date. ATI will target addressing IMDS submissions within 2 weeks after receipt.

Modified Parts: Please inform ATI of any part content modification (may come from a Tier N Supplier). To contact ATI concerning a proposed modification to a part, you can download the AT-1927-30 Supplier Product Change Evaluation form from the ATI supplier portal. Please complete the form and send it to the ATI Commodity Manager to start an ATI internal investigation. When a modification is approved by ATI, initiated by either you or ATI, you will need to submit an updated version of the MDS within 3 weeks after the modification approval or 2 weeks before new PPAP date.

If the part number changes, the MDS needs to include a new IMDS id (i.e., create a new MDS), not just a new version of the current accepted MDS.

IMDS

ATI requires a Full Material Declaration (FMD). ATI will expect you to provide a FMD in industry standard format within 45 days of our request. If we do not have the information, we cannot provide compliance information to customers and regulatory authorities, and this lack of compliance information will limit our global market access.

ATI requirements are taken from IMDS Recommendations which can be found on IMDS website https://www.mdsystem.com. All basic substances, Materials, Semi-Components and Components IMDS submissions are subject to the Rules of the IMDS Recommendations. The IMDS Recommendations can be found in the Help section after logging into the IMDS system. Using the IMDS system, requests are made for one-part number at a time (unless creating a project).

All User Interface features are free. Participating Automotive OEMs pay DXC for the system use, development, maintenance, and enhancements. Pay Licenses for enhanced capabilities are available for purchase directly with DXC Technology.

General information on registering can be found on IMDS Information Pages.
https://public.mdsystem.com/en/web/imds-public-pages.

IMDS User Manual can be found at:
https://public.mdsystem.com/documents/10906/16811/imds_usermanual_13.0_en.pdf

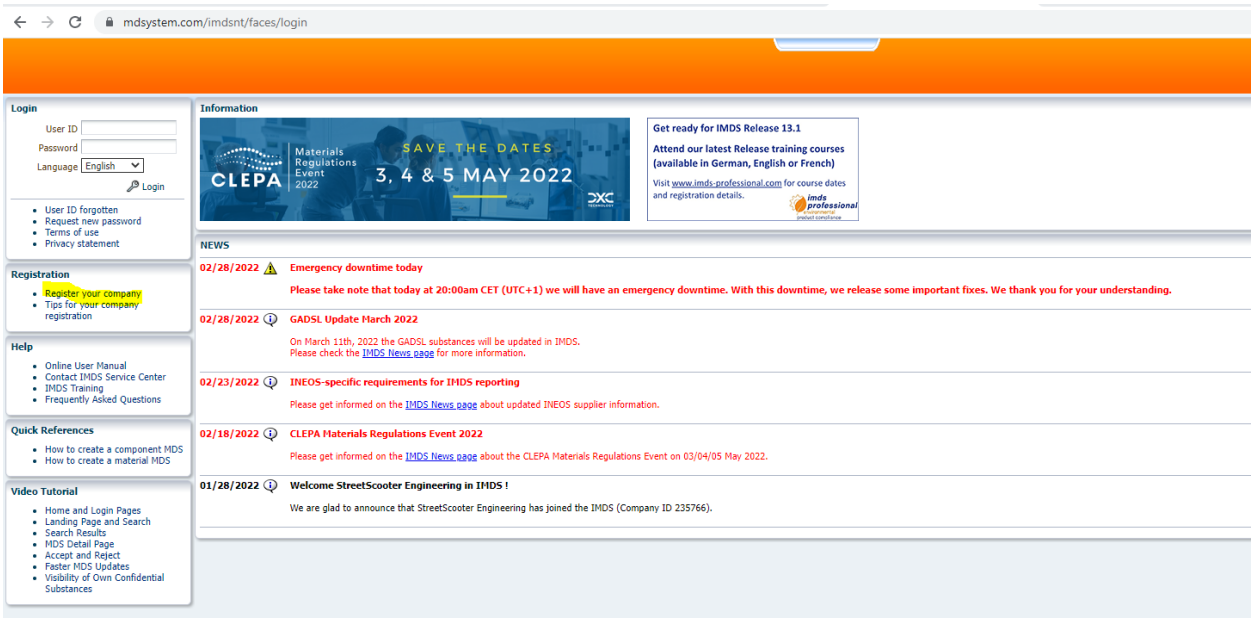
Material Data System (IMDS)
User Manual
Version 13.1

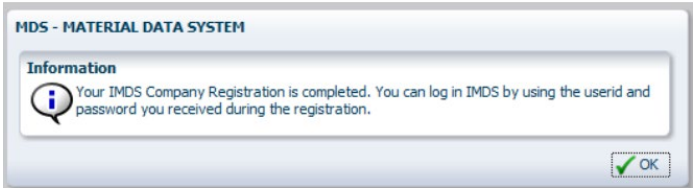
COMPANY ACTIVATION IN IMDS

Company Activation in IMDS is free and can be completed in a few short steps. Tutorials are available on the IMDS website.

https://www.mdsysytem.com

https://public.mdsystem.com/documents/10906/16811/imds_registering_tips.pdf





CREATING AN MDS

ATI purchases Materials, Semi-Components, Components and complex components. All IMDS submissions should be created in one of these formats. Most of our supply partners will be creating “Components” in the IMDS system. However, all IMDS entries begin with Materials. Materials in IMDS must be homogeneous in order to meet several legal requirements. For more information about the definition of "homogeneous", see IMDS 001 Annex I, section 1.1.

Materials can either be entered by our suppliers (preferred), an IMDS entry sent/proposed from ATI, or selected from the published materials list. We strongly suggest selecting only those published by your supplier and/or the manufacturer of the material or those published by the IMDS Committee / ILI Metals Committee.

If you are creating a MDS to represent something with layers (such as a plated metal or coated wire) or a product sold on a roll or in bulk, you should be using a semi-component for your submission. Semi-components do not have a defined weight until used; although you do enter a usage metric when you create the semi-component. This should be a rare instance for ATI suppliers.

If you are creating a MDS to represent something used in whole numbers (e.g., a part in an assembly) that has a defined weight, then it should be represented by a component. A component’s weight is given at the time of MDS creation and it remains constant throughout the manufacturing process. The measured weight of a part or assembly, also known as the “stated weight of the component” in IMDS, must match the drawing/bill of materials specifications.

The IMDS Committee has established precise acceptable variance thresholds between the measured weight and calculated weight depending on the total weight of a part.

SCIP DATABASE

At the point of this revision, May 2022, not all substances on the SVHC candidate list are recognized by SCIP. This means that not all substances with the “SVHC” flag in IMDS can be reported to SCIP. To easily identify the substances which need to be reported, the “SCIP SVHC” substance group has been created. This group is available as a filter in the Module/MDS Ingredients screen as well as a search criterion in the substance search or the Where-Used Analysis. Depending on the material’s classification and the assigned application code, certain substances are also not included in the database, because they do not retain their properties, which make them a SVHC in these cases. The following table shows which substances are ignored in which cases:

SUBSTANCE	CAS NUMBER	SVHC CLASS 7.2	SVHC CLASS 7.2
Diboron trioxide	1303-86-2	No	No
Lead-monoxide	1317-36-8	No	No
Lead titanium zirco-nium oxide	12626-81-2	No	No
Lead (II,IV-oxide)	1314-41-6	No	No
Lead-titanium-trioxide	12060-00-3	No	No
Lead	7439-92-1	No	No

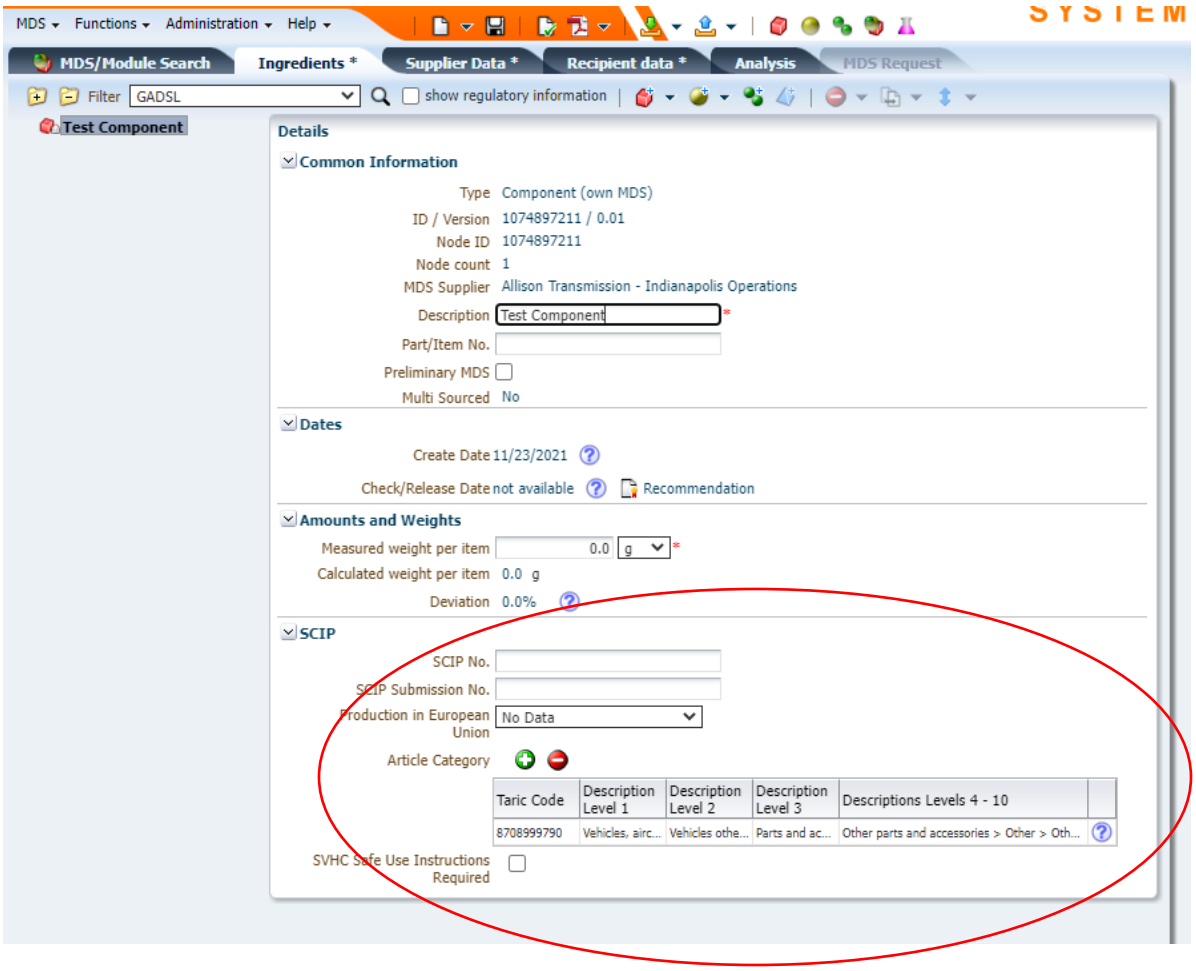
Additionally, all SVHC within materials of classification 9.x can be ignored when initiating a submission. If the Module/MDS contains at least one SVHC in such a material, the user will be asked whether they want to include classifications 9.x in the submission or not.

On the SCIP dissemination page, https://echa.europa.eu/scip-database, the content is visible, however, the supply chain is not revealed directly, as no company names are exposed, not even of the reporting company. To respect other companies' requirements for supply chain confidentiality, it is strongly recommended not to include any company names (neither yours nor ours) in the names and descriptions of Modules/MDSs as those names might become visible in the SCIP dissemination portal.

TARIC CODE DETAIL

Taric codes are needed because it is a requirement for the SCIP Database. IMDS provides a look up search criteria. If you are not familiar with this number, you may find a list of Taric Codes at

https://trade.ec.europa.eu/tradehelp/



HEAT TREAT: AUSTEMPERING AND NITRIDING

In most heat treatments, you do not change the chemistry of the product. However, due to the necessity of having the information in the system, lack of change does not exempt our suppliers that heat treat from entering data. In an austempering process you don't change the chemical composition. It is an isothermal heating process so there is no change to the original MDS. The nitriding and case hardening processes are thermal processes where N (Nitrogen) and/or C (Carbon) is diffusing into the steel. The result is an inhomogeneous concentration of N and/or C in a thin surface layer (about 100 µm thickness in a nitriding and 1 mm in the case hardening process).

Due to the inhomogeneous distribution, the concentration of N or C depend on the depth and cannot be described in IMDS. Since Nitrogen and Carbon are not elements which are declarable or prohibited or can be a source for danger in the handling or recycling process, the IMDS committee decided in this special case that Nitriding or Case Hardening need not be reported in IMDS.

How to develop an MDS:

In the above cases of austempering, nitriding and case hardening, there are no specific materials that needs to be created.

How to handle in IMDS:

The company that does the treatment receives a component (or semi-component) in IMDS from the company that supplies the part in the physical supply chain with forwarding allowed. The company that does the treatment creates a copy/forward of the received component (or semi-component) and adds the recipient information (being very careful with the part number and supplier code as you cannot make another copy/forward) and sends to the customer. If the supplier of the part and the customer are the same, it is then up to the customer to determine whether the company that performs the treatment needs to report.

CONFIDENTIAL SUBSTANCES

Substances that are not declarable or prohibited according to GADSL, or are not an SVHC, or do not require an application code, may be marked “confidential”. These substances have a check box “confidential” in the detail section of the basic substance on the Ingredients page. If a substance is marked “confidential”, it may only be seen by users in the creating company and by “trusted users” in another IMDS company. All other users see is "Confidential Substances". It is not possible to transfer “confidential substances” via data download into in-house systems – not even by OEMs. It is not possible for users in other IMDS companies to make a copy of the tree and retrieve the actual data.

No substance that is flagged as D, P, or D/P can be marked “confidential” at the time of the material creation. No joker/wildcard can be marked “confidential”. There is no joker/wildcard "confidential substance" or "secret substance".

INTERNAL RELEASE, PROPOSE AND SEND

In IMDS, there are four possibilities to submit a MDS:

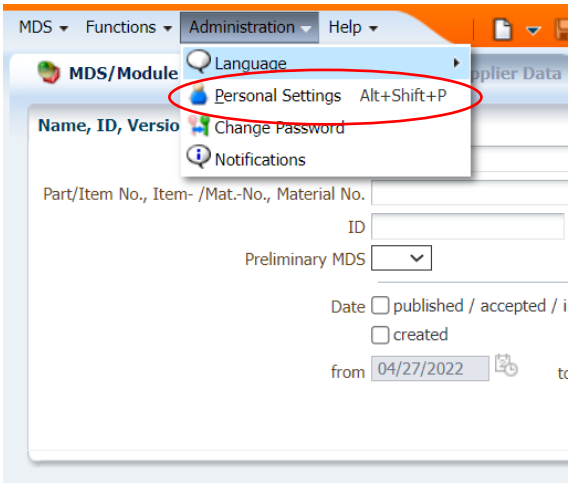
1. "Send": the MDS will be sent to 1 recipient
2. "Propose": the MDS can be sent to several recipients
3. "Internal": the MDS will only be available for internal use only
4. "Publish": the MDS will be available for everybody.

All MDS’s submitted to ATI, must be internally released within your own company. After internally releasing, a MDS may be Proposed or Sent. ATI requests that Suppliers “Send/Propose”, “Internal” released MDS’s for acceptance or rejection. Once accepted, the MDS cannot be deleted. However, it can be revised by the sender and re-submitted to ATI organization ID #**28623**.

ATI does not recommend “Publishing” your MDS.

ACCEPTANCE AND REJECTION

ATI recommends that your Compliance Administrator turn on all notification preferences within IMDS to enable automatic email notification of acceptance or rejection.



All rejections will include a comment stating the reason for rejection. For information regarding how to fix and re-submit rejected IMDS's, please refer to the IMDS Rejection Guide found at https://www.sustainable-markets.com/overcome-imds-rejections/ .

The most common rejections are listed below:

1. Recipient Contact is Inactive
2. Incorrect Description or ATI Part/Item Number
3. Variance Between Measured Weight and Calculated Weight
4. Failure to Use IMDS Committee Published Materials When Creating Entries with Metals, Platings or Passivation Coatings
5. Creating/Using a Polymer Entry Composed of a Single Substance
6. Building MDS Trees That Do Not Follow the Proper Tree Hierarchy
7. Incorrectly Applying ELV Annex II Exemptions
8. Incorrectly Dealing with "Unreportable" Process Chemicals
9. Creating a New Material Datasheet Instead of a New Version of the Original MDS

WEIGHT DEVIATIONS

The measured weight of a part or assembly, also known as the "stated weight of the component" in IMDS, must match the drawing and/or bill of materials specifications.

The IMDS Committee has established precise acceptable variance thresholds between the measured weight and calculated weight depending on the total weight of a part. The weight deviation must not exceed a certain

threshold. Exceeding the threshold will result in a warning in the MDS check. The threshold depends on the components measured weight. They are listed below:

Measured Weight per Item	Allowed Max. Deviation
<1g	100%
>1g – <999.99g	10%
>1kg – <9.99kg	5%
>10kg – <99.99kg	2%
<100kg	1%
≥100kg	0.5%

If you feel you may have an outdated drawing, or are concerned about weight deviations, please email imds@allisontransmission.com and we will work with the appropriate ATI personnel to ensure part weight accuracy.

SUPPORT

For issues related to IMDS data entry, to support ATI by e-mail, web meeting or with limited training sessions, please contact:

ATI: imds@allisontransmission.com

For questions regarding IMDS reporting requirements refer to the contact at IMDS Public Pages contact information at:

https://public.mdsystem.com/en/web/imds-public-pages/oem-contacts

For questions regarding the registration of your company, login, or other issue related to the system please contact your Client Manager or the IMDS Service Center at:

https://public.mdsystem.com/en/web/imds-public-pages/imds-service-centers

For technical questions regarding the MDS data please refer to the IMDS User Manual:

https://public.mdsystem.com/documents/10906/16811/imds_usermanual_13.1_en.pdf

For questions regarding training:

https://public.mdsystem.com/en/web/imds-public-pages/imds-training-courses

For tutorials please visit:

https://public.mdsystem.com/en/web/imds-public-pages/tutorials

To access IMDS FAQ's:

https://public.mdsystem.com/en/web/imds-public-pages/faq

For questions regarding rejections:

https://www.sustainable-markets.com/overcome-imds-rejections/