



SAFETY DATA SHEET INFORMATION REQUIREMENTS FOR SUPPLIERS

Introduction

The following policies and instructions are for Delphi Technologies suppliers in regards to the submission of Safety Data Sheets (SDS) to Delphi Technologies. The information provided will be used in programs to protect the health, safety and environment of individuals and communities associated with Delphi Technologies. The chemical manufacturer, importer, distributor or employer preparing the SDS shall ensure that the information is recorded accurately, reflects the scientific evidence used in making the hazard determination and complies with all applicable international, national, state, province, and local laws.

Scope

This specification should be used at all Delphi Technologies sites and majority owned/operated joint ventures where there is a legal requirement to provide SDSs or SDS like information.

Materials That Require SDSs

- All liquids, gases, pastes, powders, flakes, gels, aerosols, and many solids.
- Any product which generates dust, fumes, fog, vapor, etc., during shipping, storage, handling, use, or disposal.
- Any product with specific ventilation requirements.
- Any product with personal protective equipment (PPE) requirements or recommendations.
- Any product stored in a pressurized cylinder or container.
- Any product that emits radiation higher than background.
- Any product intended to be altered, processed, etc., (e.g., cut, mold, grind).
- Lubricants or coatings on steel or other articles.
- “Articles” that will be processed by Delphi Technologies.
- “Consumer products” that are not used in a manner typical to a consumer.

Examples of these products include but are not limited to:

Abrasives	Office supplies containing hazardous chemicals
Acids & caustics	Oxidizers
Adhesives & sealers	Paint & related chemicals
Castings, forging	Pesticides & biocides
Cleaners	Printer’s inks
Compressed gases	Resins
Coolants & metalworking fluids	Soaps
Flux (e.g., soldering)	Solder
Fuels (e.g., coal & gasoline)	Solvents
Insulating materials	Steel
Lubricating oils & greases	Welding rods & wires
Nylons & other plastics	

General Instructions Applicable To All New and Updated SDSs

Preferred Submission Format of SDS Information

All SDSs must be prepared in compliance with applicable country specific legal requirements. For most regions, this means that the SDS should be compliant with the legally adopted revision of the [United Nations Globally Harmonized System of Classification and Labeling of Chemicals \(GHS\)](#) for the country in which the product will be used.

Delphi Technologies prefers all new and updated SDS information to be submitted as an electronic text or graphic image. The preferred format is PDF text; however Delphi Technologies will accept any common text/graphic format. The SDS text/graphic documents must be compliant with local Globally Harmonized System (GHS) legal requirements and conform to the requirements of this document. All confidential or trade secret information should be clearly identified on a **separate page or in a separate document**.

Language

The SDS must be provided in the language of the country of use. If available, a copy of the SDS in English should also be provided. If the material is being transported across a border (for example from the USA to Mexico) then the SDS must be provided in the languages of both countries.

Readability

The SDS must be legible. Font, point type, margin width and format for an SDS must allow for web page viewing and printing, quality reproduction, copying, and faxing.

Chemical Disclosure

Compositional disclosure information is required by Delphi Technologies Health, Safety and Environmental personnel to fulfill three major objectives;

1. Train employees working with chemical materials regarding their hazards, safe use, handling & disposal in order to fulfill internal Health & Safety requirements as well as international occupational regulatory requirements (i.e., United States Occupational Safety and Health Administration (OSHA), Mexico Secretaría del Trabajo y Previsión Social (STPS), Europe Registration, Evaluation, Authorisation and Restriction of Chemical substances (REACH), China State Administration of Work Safety (SAWS), Brazil Secretaría de Inspeção do Trabalho (SIT), etc.)
2. Ensure environmental compliance and manage chemical risks.
3. Ensure dangerous goods compliance per ICAO/IATA, and IMO international dangerous goods regulations as well as National Hazardous Materials/Dangerous Goods regulations for intra-state or interstate transportation classification and identification.

One hundred percent disclosure is required to fulfill these objectives. In cases where CAS # or EC # disclosure of unique ingredients to your formulation is considered “sensitive” (**not a “Trade Secret”**), Delphi Technologies will accept ingredient addendum’s to the SDS and will maintain this information separate from that used for employee training.

Delphi Technologies requires 100% disclosure of all ingredients found in a product. This means an ingredient must be listed, even if it is generally considered non-hazardous (e.g., water). A

CAS registry number or EC number and weight percent range should be provided for every constituent in the product.

If a CAS registry number or EC number of an ingredient is not available because the item is not a discrete chemical that can be represented by a chemical formula or is a mixture where the identity of individual components may be unknown or may vary, then a good chemical description must be provided. Examples of good chemical descriptions include, but are not limited to, those shown in the following table:

<u>Unacceptable Name</u>	<u>Acceptable Name</u>
Resin	[Alkyd or benzophenol or other] resin
Urethane resin/polymer	Diphenylmethane diisocyanate (MDI) based urethane resin
Polyurethane resin/polymer	Diphenylmethane diisocyanate (MDI) based urethane resin
Hydrocarbon resin	Alkyd resin
Surfactant	Linear alkyd sulfonate (LAS)
UV Absorber	Benzotriazole
Additive	A specific chemical family is required
Epoxy resin	Bisphenol A diglycidyl ether epoxy resin
Phenol resin/polymer	benzophenol based resin
Thickener	Starch (gelatin, semi-synthetic cellulose)
Pigment or Colorant	Yellow iron oxide pigment
Inhibitor	Acetanilide
Antioxidant	β -Naphthylamine
Curing agent	TDI based urethane prepolymer
Emulsifier	Fatty acid emulsifier (C>9)
Detergent	Alkyl benzene sulfonate (ABS) (C>10)

As mentioned above, all ingredients of the product must be listed. Components recognized as carcinogens by International Agency for Research on Cancer (IARC), or in the United States by National Toxicology Program (NTP) or Occupational Safety and Health Administration (OSHA), must be listed if they are present in the product at concentrations of 0.1% or greater. In addition, biocides used in metalworking fluids, flame retardants, and pigments having concentrations of 0.1% or greater must be listed. Disclosure must comply with country of origin and country of destination classification of hazardous and carcinogenic substances.

Chemicals subject to international, national, state, province, local and transportation reporting requirements must always be submitted with CAS registry numbers. Similarly chemicals identified in environmental regulations such as the known or suspected carcinogens must also be reported with CAS registry numbers. **These items cannot be claimed as trade secret.**

All of the product's components with applicable exposure guidelines or limits must be identified by CAS # or EC #, as well as identifying the source (e.g., Occupational Safety and Health Administration Permissible Exposure Limits (OSHA PEL), American Conference of Governmental Industrial Hygienists Threshold Limit Values (ACGIH TLV), National Institute of Occupational Safety and Health Recommended Exposure Limits (NIOSH REL), AIHA WEEL, manufacturer standard, etc., and clearly indicating the units of measure for the given guidelines. Ingredients with associated occupational exposure limits or recommendations from the entities identified cannot be claimed as Trade Secrets. Their disclosure is essential to our Industrial Hygiene efforts to control workplace exposure.

Trade Secret Ingredients

It is not the intent of Delphi Technologies to obtain exact formulations of trade secret ingredients. Delphi Technologies is committed to protection of the environment and the health and safety of its employees, complying with regulatory reporting requirements and managing

the chemical risks associated with the manufacture and use of our products. Therefore, “trade secret” ingredients should be used infrequently, and then, only in conjunction with a good chemical description and when accompanied by toxicological information as outlined below.

Ingredient disclosure Addendum’s to the SDS should only be used when absolutely necessary in order to limit access to possibly sensitive information. Requests for addendum ingredient information to be secured within Delphi Technologies for regulatory compliance and chemical risk issues **should not be construed as a confidentiality agreement**. Delphi Technologies Environmental, Health & Safety personnel will have access to this data and will share it with employees, customers, regulators or community representatives to address chemical risk issues when necessary.

For any ingredient that is not identified by the CAS number or EC number, Delphi Technologies may require that additional industrial hygiene sampling, toxicological and/or environmental fate data be supplied

Addendum/Addenda

A company’s SDS may be submitted along with a separate page listing any remaining data required by Delphi Technologies. It may be called an addendum, attachment, additional information or words to that effect. This addendum, however, must be clearly labeled with the trade name and must be dated.

Confidentiality Policy

Delphi does not enter into confidentiality or secrecy agreements for SDS information.

Receipt by Delphi Technologies of SDS, attachment or addendum marked "confidential", "proprietary", "trade secret" or words to that effect does not constitute a confidentiality or Trade secret agreement with Delphi Technologies. Delphi Technologies will not distribute information marked confidential etc., but will retain and store this information in a locked location. This information will not reside on the Delphi Technologies internal database for general viewing or printing, but will be entered into the confidential portion of the database for the purposes of environmental and occupational health compliance, or regulatory or legal issues, involving requests from proper authorities, Industrial Hygienists and medical professionals. Material marked "for Delphi Technologies use only" will be accepted but will not constitute a secrecy agreement on the part of Delphi Technologies. Delphi Technologies does not sign secrecy or confidentiality agreements. Refer to the Trade Secret section of this document for guidelines on protecting trade secret information.

Regulatory Compliance

All suppliers are required to comply with local, regional, national and international regulations. For example, the USA, Europe and China maintain listings of chemicals approved for commercial commerce within their borders that may require usage reports and/or are restricted in some fashion (Toxic Substance Control Act (TSCA), Registration, Evaluation, Authorisation and Restriction of Chemical substances (REACH), Measures on Environmental Management of New Chemical Substances (Order No. 7 of MEP), respectively). Suppliers must include this information on the SDS.

SDS Revision Date

The SDS date of preparation or effective/revision date should be less than 3 years old. If greater than 3 years old, written verification that the SDS is the most recent revision available by the manufacturer will be acceptable as long as the SDS is prepared in compliance with current regulations.

Document Control Dates

Date	Version	Modifications	Author
April 30, 2018	008	Initial release of Delphi Technologies document.	Buckbee