



Why a company should use the Compliance Data eXchange (CDX)

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Topics to cover



The Business Challenges



Who is DXC Technology (DXC)



What is the Compliance Data eXchange (CDX)

The Business Challenges

Global sales require managing regulatory, client and social obligations to retain and grow market access and project a positive corporate responsibility image



Primary Motives for ESG Metrics Reporting

Increasing liability



Economic Viability

Create competitive advantage

- Minimize Costs (Mfg. process, product lifecycle, recycling)
- Resource Management



Society

Corporate image - reputation impact

- Investor relations and economic success
- Sustainability as business objective



Laws & Regulations

Compliance

- A multitude of regulations per region / market
- Regulation volume is rapidly increasing trend



Every industry is faced with environmental legislation, and every global company finds it a bit overwhelming



Inadequate reporting / missing information may result in:

- Ban from market
- Legal prosecution
- Loss of positive market perception



Provisioning compliance data

- Keep it safe and consistent throughout the product lifecycle
 - Involve the whole supply chain and utilize a global approach
- Worth cost and effort up front to avoid lengthy and time-consuming processes
 - Easier with standardized data, tools and processes



Most regulations require product substance composition

Compliance considerations

Business case for Compliance: Sustainability

Sustainability and Responsible sourcing (Socially Responsible Sourcing) are often linked when discussing the integration of environmental, social, ethical, and economic factors.

Sustainability posits that “an organization [is responsible] for the impacts of its decisions and activities on society and the environment, through transparent and ethical behavior that... takes into account the expectations of stakeholders [and integrates these] throughout the organization and... its relationships.”

- ISO 26000 Guidance on Social Responsibility

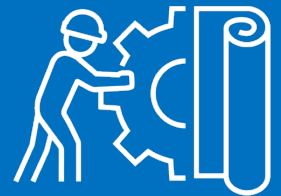
Environment

- Energy efficiency
- Water
- Waste & material use
- Product end-of-life



Social

- Health and safety
- Worker conditions



Supply chain

- Sustainable sourcing



Ethics

- Corruption and bribery
- Intellectual property



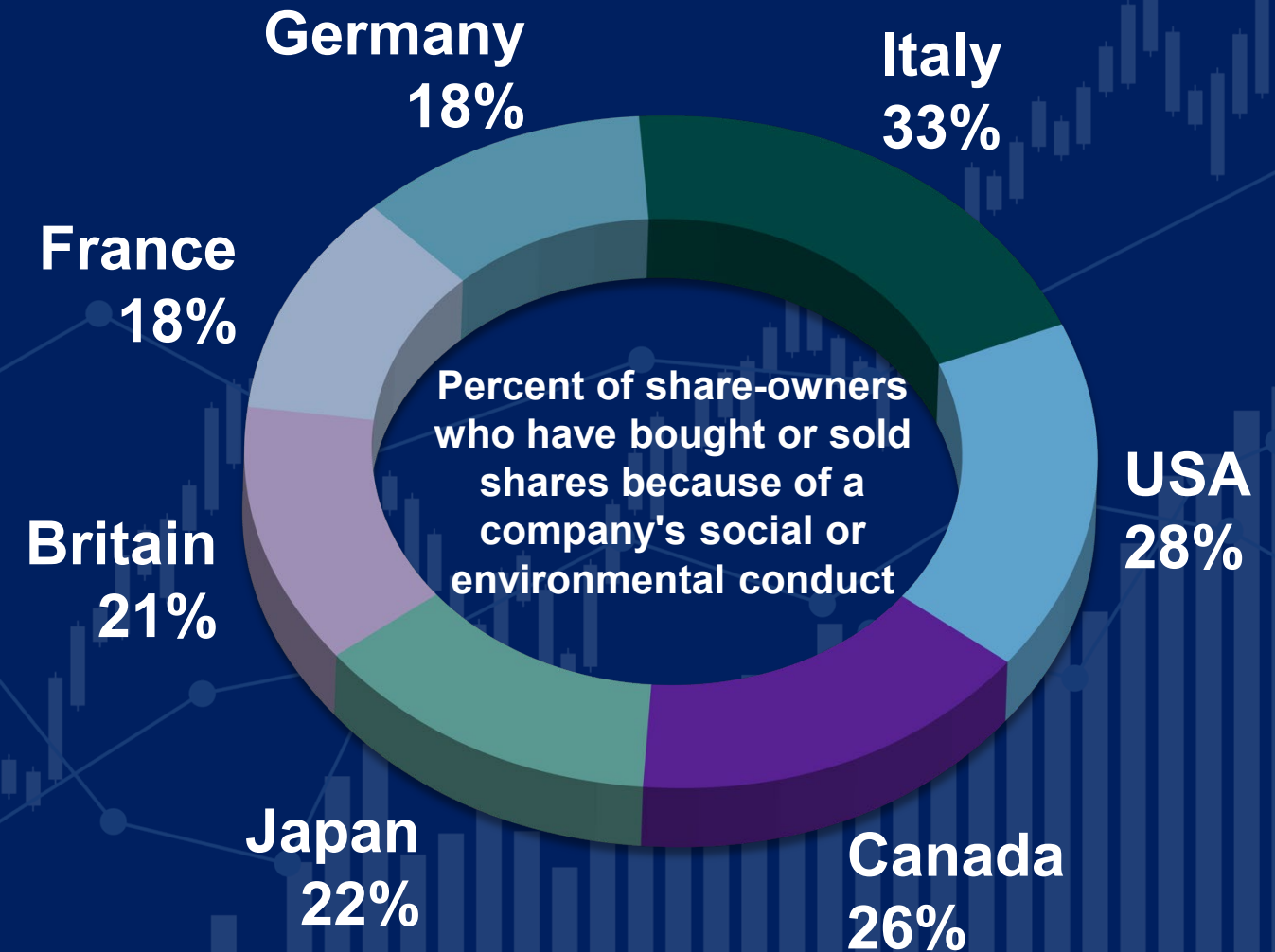
Investor Responsibility Expectations

Significant numbers of investors consider a company's environmental and social responsibility during investment decisions

- A recent survey interviewed about 1,000 people geographically distributed in each of 20 countries
- In the USA, where 61% of people own shares, more than a quarter said they had bought or sold shares on the basis of a company's social performance.
- Similar results emerged in Italy, Canada, Japan, Britain, France, and Germany

Source: Environics International

4 years old; Needs Refresh



Consumer Responsibility Expectations

In an April 2016 Survey of 2000 U.S. adult consumers:

70% reported that a company's social or environmental responsibility is usually a consideration when making a major purchase

56% reported rejecting a major product for purchase consideration based upon reports of a company failure in social or environmental responsibility

35% reported discouraging others from purchasing from these companies

26% reported selecting a product based upon a company's reputation for good social or environmental responsibility

Source: Mintel and Lightspeed GMI

Conclusion

A majority of U.S. adult consumers do not reward companies for responsible conduct, but they will penalize a company for irresponsible conduct.

Accurate materials data is essential to legal compliance.

Information on materials in the supply chain must comply with legal requirements

Questions your company must address?

Do we have complete knowledge of what is it that we are selling?

Is my product compliant to market chemical regulations or am I at risk?

Does a product contain substances restricted in a specific regulation?

To what amount are these substances contained in my products?

Are these substances contained in supplied parts?

Are my suppliers delivering parts which comply to import and export regulations?

What exemptions / authorizations / restrictions are associated with these substances?

Increased pressure to be sustainable

History of Regulatory Compliance Timeline

ERA OF WORKPLACE PROTECTIONS

1910's

Few restrictions

1920's

First employment
rights laws

1930's

First employee
machinery safety laws

1940's

First employee plant
safety zone laws

1950's

First employee personal
protective equipment laws

ERA OF PURCHASER PROTECTIONS

1960's

First consumer
rights regulations

1960's

First materials
safety legislations

1970's

First product materials
safety restrictions

1970's

First product operation
safety legislations

ERA OF WORKPLACE ENVIRONMENTAL PROTECTIONS

1980's

First wastewater/water
pollution restrictions

1990's

First air pollution
restrictions

1990's

First broad workplace
chemical restrictions

1990's

First product labelling
and classification laws

ERA OF PURCHASER ENVIRONMENTAL PROTECTIONS

2000's

First Product lifecycle
chemical law (ELV)

2000's

First broad product-
category laws (RoHS)

2010's

First universal
product-category laws

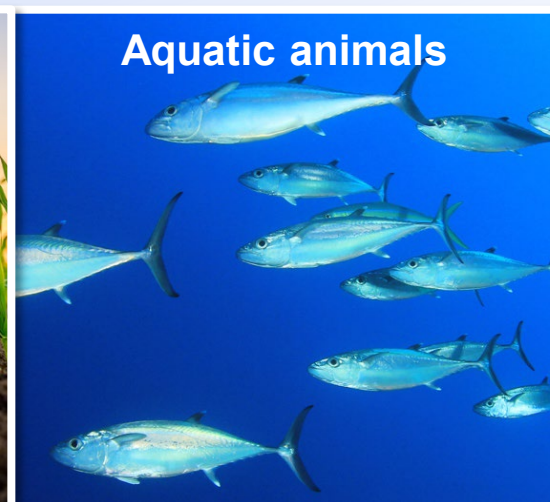
2020's

First circular economy
laws (WFD, TSCA)

How recent regulatory chemical compliance began

- In the 1980's across Europe, miscarriages and birth defects were increasing at a growing rate.
 - Studies were commissioned to determine cause
 - In the early 1990's, the European Union recognized a severe problem with heavy metal poisoning
 - Improper disposal of automobiles, appliances, electronics, etc. was poisoning the drinking water
- This clear, present danger required immediate action
 - Automotive was the first target for remediation, via the **End of Life Vehicle (ELV)** legislation
 - ELV requires Automotive OEMs selling in EU to identify, reduce, and eliminate heavy metals in their products

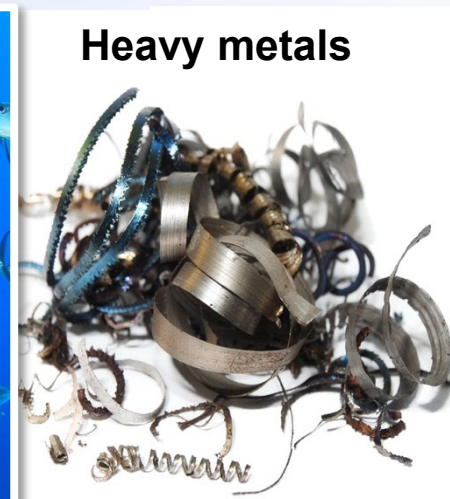
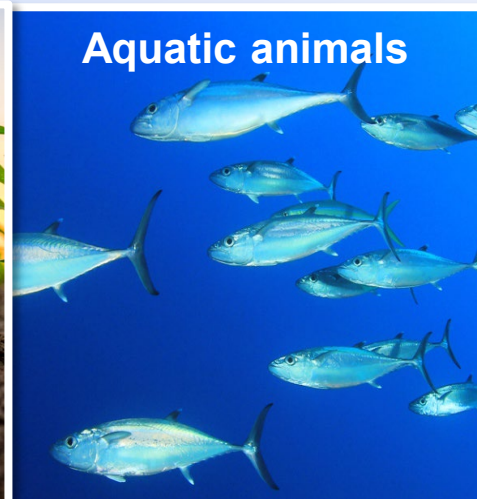
Heavy metal toxicity: Abnormal growth and development



Where regulatory compliance went next

- ELV has been effective at reducing the rate at which heavy metal contaminants are introduced into the environment
 - Next causes of contamination are electronics & industrial products
 - Also identified as “Substances of Very High Concern (SVHC’s) were phenyl and phthalate plasticizers, used to enhance performance, e.g. instrument panels, wire insulation, housings, Tupperware®
- In the mid 2000’s European Union enacted “Restriction of Hazardous Substances (RoHS)”, and “Waste Electrical & Electronic Equipment (WEEE)”, exempting a decreasing number of product categories
 - RoHS and WEEE have both been further extended by new regulation versions during the intervening years
 - Most global jurisdictions have adopted a version of RoHS and WEEE
 - RoHS compliance is necessary for CE marking, required to import into or sell in-scope products in the European Union & other areas

Heavy metal toxicity: Abnormal growth and development



Compliance



Where regulatory material & product compliance is today

EU REACH:

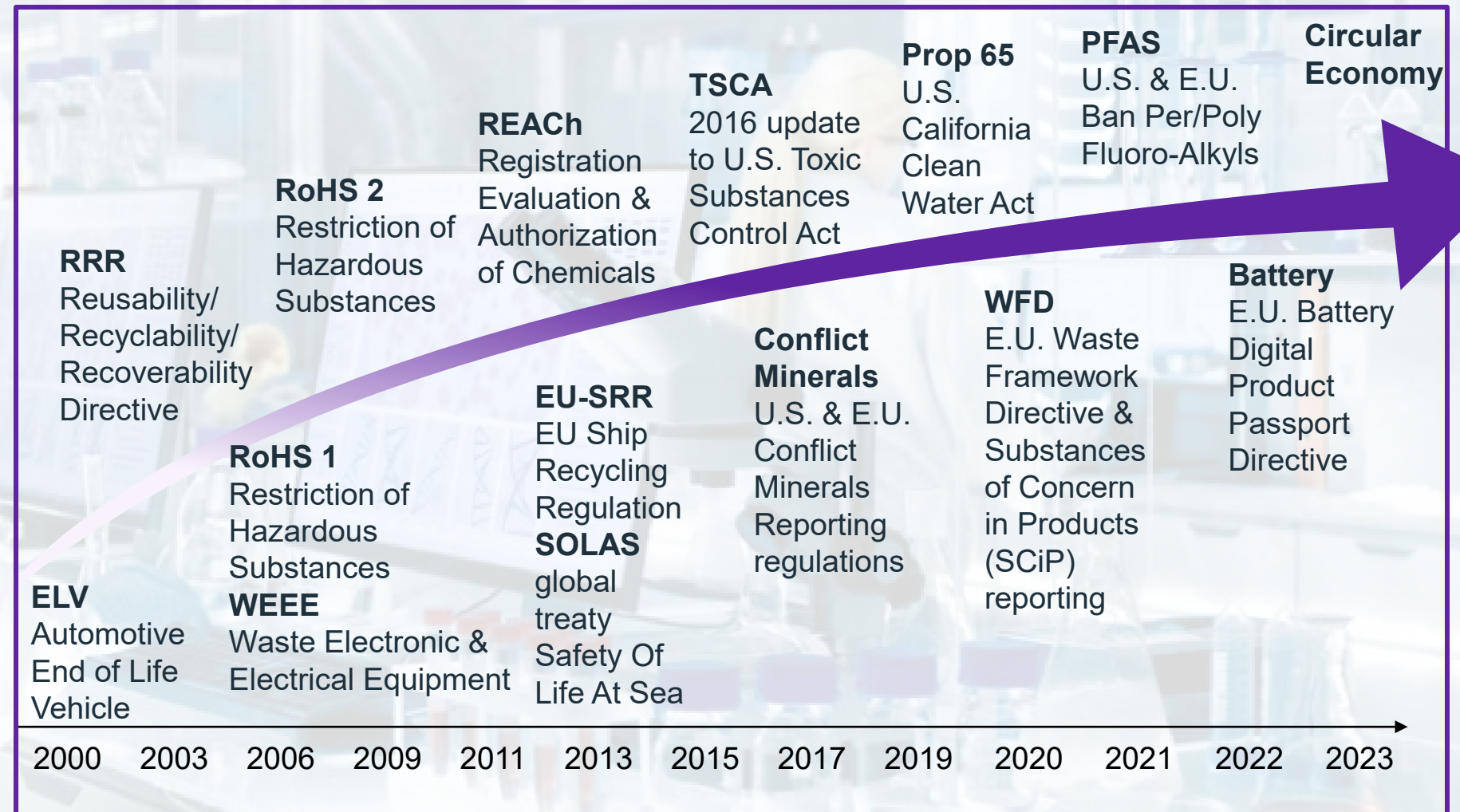
235 CL SVHC substances as of June 2023,
95+% of products Multiple changes per year.
11 new substances added in 2023 alone!

California Proposition 65 – Revised Nov. 2022.
Requires labels on products containing SVHCs
and allows “bounty-hunters” to bring lawsuits
1000s raised in last 6 months.

US Toxic Substance Control Act (TSCA) reform
Regulation continually adds new hazard types with
evolving substance lists and topics. In 2021, PIP-3:1
Persistent, Bioaccumulative & Toxic (PBT) provision
almost halted U.S. hydraulic equipment production

Added Corporate Responsibility legislations

- U.S. / E.U. Conflict Minerals
- UK Modern anti-Slavery
- Fair Labor practices / No Child Labor initiatives



Where is the PFAS?

Flexible plastic
Cable and wire insulation
Conduit and conduit connectors



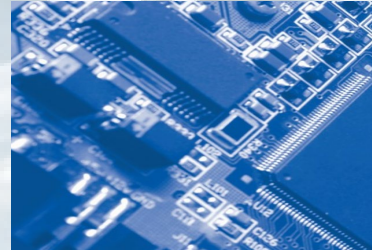
Smudge resistant touch screens



Fire fighting foam
Chemical / Biological resistant PPE
Bacteria / virus resistant fabrics
Dirt resistant fabrics
Waterproof fabrics



Stain resistant
fabric treatments

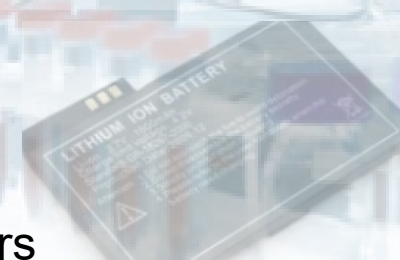


Circuit board films
Conformal coatings
Cleaning fluids for microelectronics
Semiconductor manufacturing aids

Paints
Non-stick coatings
Stain-resistant sprays and treatments
Self-cleaning coatings for weather resistance



Batteries
Shock absorbers
Bushes and Bearing surfaces



Compliance & Risks

Hydraulic fluids
Gaskets
Seals
Hoses
Valves
Tubes
Sealant
Flexible joints
Pipe & tank linings



Lubricants
Potting Gels
Adhesives
Greases
Surfactants



Refrigerants/
F-Gases



How the Product Lifecycle Affects Compliance

Compliance is a moving target, regulations add/change often

Products need to be recertified
Products need to be adapted / re-designed

Full Material Disclosure (FMD) is the strongest mitigation solution for this risk

Product specifications change throughout the supply chain

Products need to be recertified
Types need to be recertified / re-approved

For complex products, changes several layers down may not be obvious at the finished product layer

Supplier parts change: design and/or specs govern change

Products need to be re-certified
Products need to be adapted / re-designed to resolve changes

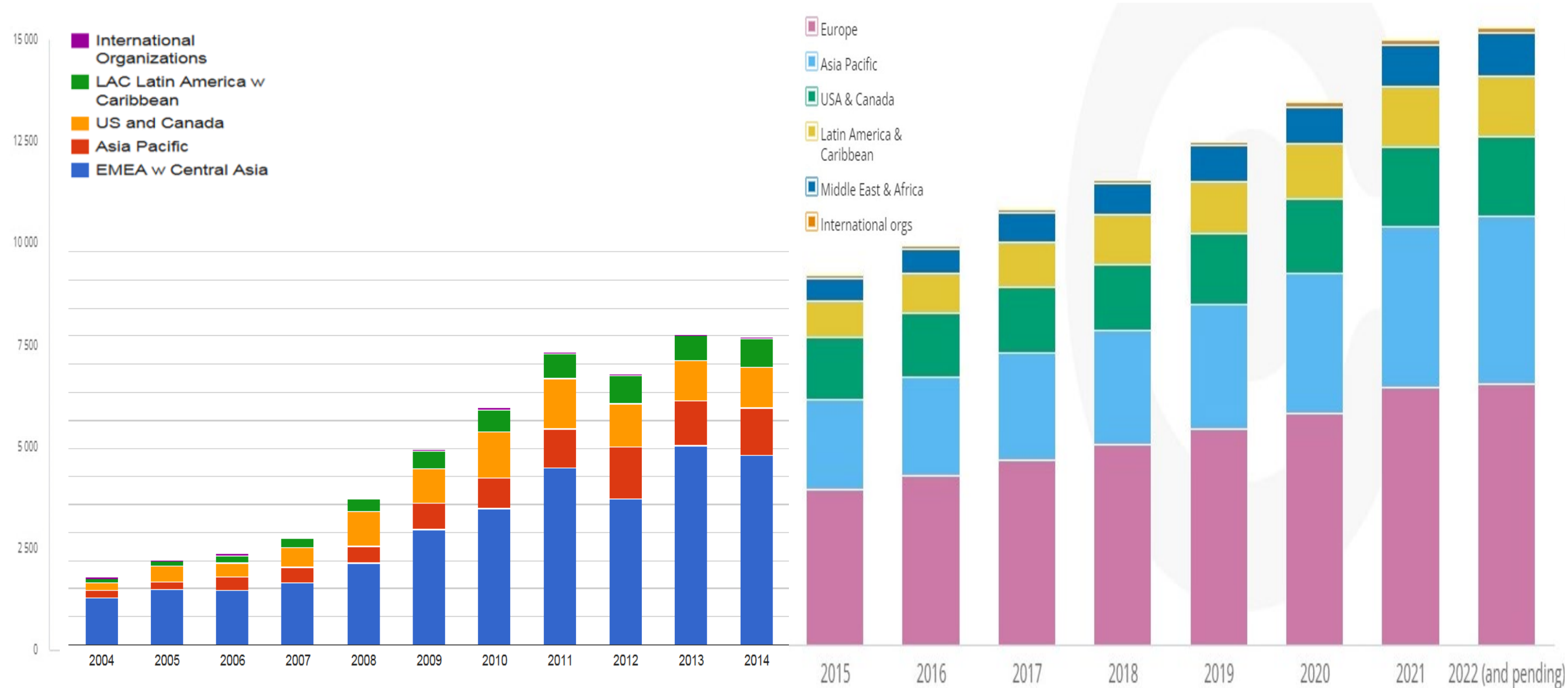
All this needs revised information from the supply chain

There are only reliable two ways to obtain the needed information:

Test samples of the finished product, or obtain answers from the source



Chemical Management Regulations by Region over time (cumulative)

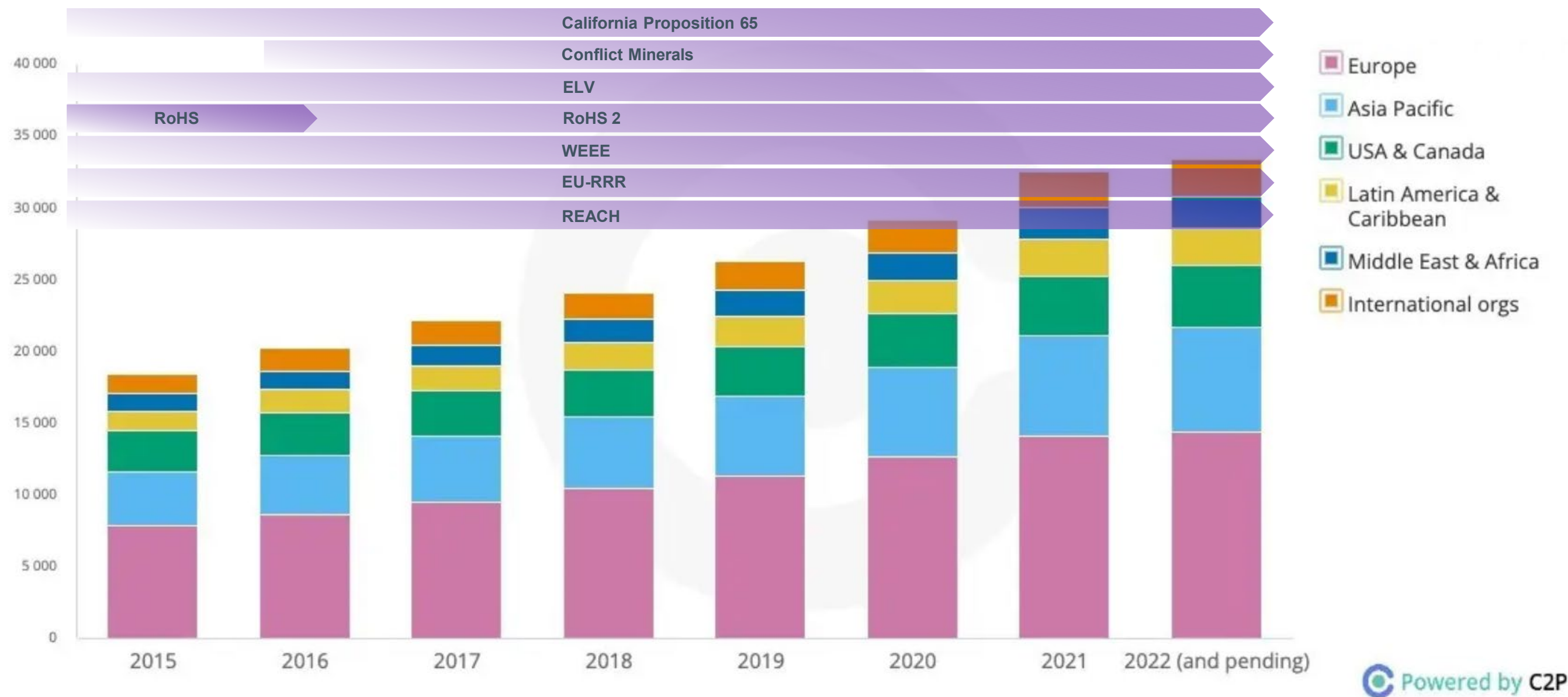


Source: Compliance and Risks

Powered by C2P

New Compliance Regulations

Per Region / Year





Who is DXC Technology (DXC)?



\$16.3B
FY22 revenue

70+
countries

130,000+
employees worldwide

240+
240+ customers in the Fortune 500,
and leading global companies

200+
partners

We deliver excellence for our customers and colleagues

DXC Technology delivers the IT services our customers need to modernize operations and drive innovation across their entire IT estate.

Leadership and recognition

- A Fortune 500 company, No. 207 in 2022 ranking (NYSE: DXC)
- Forbes World's Best Employers 2021
- Leader: IDC MarketScape Worldwide Cloud Professional Services 2022
- Leader: NelsonHall NEAT Report Property and Casualty Operations Transformation 2022
- Leader: NelsonHall NEAT Report Cyber Resiliency Services 2021
- Newsweek's America's Most Responsible Companies 2022



Transform your business with our six differentiated offerings

Global Business Services

ANALYTICS & ENGINEERING

APPLICATIONS

INSURANCE SOFTWARE & BPS

In GBS, our offerings:

- Enable data-driven decisions, automation and state-of-the-art engineering
- Help customers reimagine business with transformative applications
- Accelerate business outcomes for insurers and banks with a broad portfolio of software and business process services

Global Infrastructure Services

SECURITY

CLOUD INFRASTRUCTURE & ITO

MODERN WORKPLACE

In GIS, we help customers:

- Weave security throughout the enterprise
- Simplify and optimize on-premises IT and achieve a secure, high-performance cloud environment to realize positive business outcomes
- Create a rich workplace experience

Customer stories

- **BMW Group** harvests and manages a daily collection of more than 1,500TB of raw data from vehicle sensors, simplifying insights and reducing time to develop autonomous vehicles.
- **Sabre Corp.** uses outsourcing and IT modernization capabilities to transform technology to help the company unlock additional value across its businesses.
- **Campbell Soup Company** supports operations across infrastructure, applications and security with an IT foundation focused on value-added activities.
- **Lockheed Martin Aeronautics** is implementing its vision for smart factories using a next-generation digital manufacturing execution system and the digital thread framework.

How DXC Technology became involved

In the early 90's, EU legislators approached leading European auto makers to begin voluntary heavy-metal reporting

The OEMs learned Tier-1s didn't have chemical composition either, & they needed to reach deep into supply chains. These companies conducted several tests, and determine a shared approach was most effective and lowest cost.

When ELV was enacted, the Auto OEMs contracted DXC (then EDS) to develop International Material Data System (IMDS), requiring reporting of 100% Full Material Declarations, with $\leq 10\%$ masked as confidential/proprietary.

The EU OEMs discovered they had inadequate information on substances in vehicles, and began programs to collect this information from their suppliers, using spreadsheets, databases, engineering systems, supplier portals, etc.

After several years, the OEMs were still unable to answer legislator questions about SVHCs. The EU legislature began the process to make reporting mandatory using the ELV legislation.

Since introduction in 2000, IMDS use has expanded to virtually all Auto OEMs, ~240,000 supplier companies, 495,000 users, & > 90 Million product declarations, with more than 10 million added in last 2 years.



How DXC Technology is involved today

The progress made through success of these programs in Europe has led to similar programs in virtually all other jurisdictions

HP separated into HP and HPE, with IMDS and CDX transitioning to HPE. HPE sold their Enterprise Services organization, which merged with CSC to create DXC Technology

We have updated CDX with over 20 releases since its introduction, each including client feedback, regulatory changes, and updated functionality



In 2011, using our incomparable experience in compliance reporting and our experiences as an electronics OEM (HP) as a basis, we released CDX

Over the past 8 years, CDX has grown and expanded to address the concerns of most discrete product manufacturing and sales companies, and a wide range of the most common material, corporate responsibility, and sustainability concerns.

What is the Compliance Data eXchange (CDX)



A SaaS Portal in the cloud to communicate with suppliers and customers on materials in the supply chain and their compliance with legal requirements



An application in the cloud which can be connected to company internal systems

Provides the option for Material Compliance Reporting and as well Conflict Minerals Reporting (RMI CMRT) and to analyze material declarations against many international regulations
Can import and export declarations in different formats
IMDS, IPC1752A, IPC1754, IPC1755 (CMRT), IEC62474



A service providing support for Chemicals and Regulations

(CDX Chemical Service)
REACH (e.g. AXIV, AXVII), RoHS (exemptions), China
RoHS, CalProp65, Packaging, Batteries, IMO...
support for standardized materials (CDX Material Service)



Free of investment for Hardware or Software and ready to use, immediately

What is Compliance Data eXchange?

Challenge: Disparate Information Distributed throughout Your Supply Chain

Data Security Risk:

- E-mail method exposes proprietary business information to interception
- Data collection throughout the supply chain is mostly arbitrary, sometimes even for same downstream consumer, depending on segment / scheme
- Risk of inaccurate data – each supplier reports the same information in many different formats due to lack of standard forms

Inconsistency in information sharing:

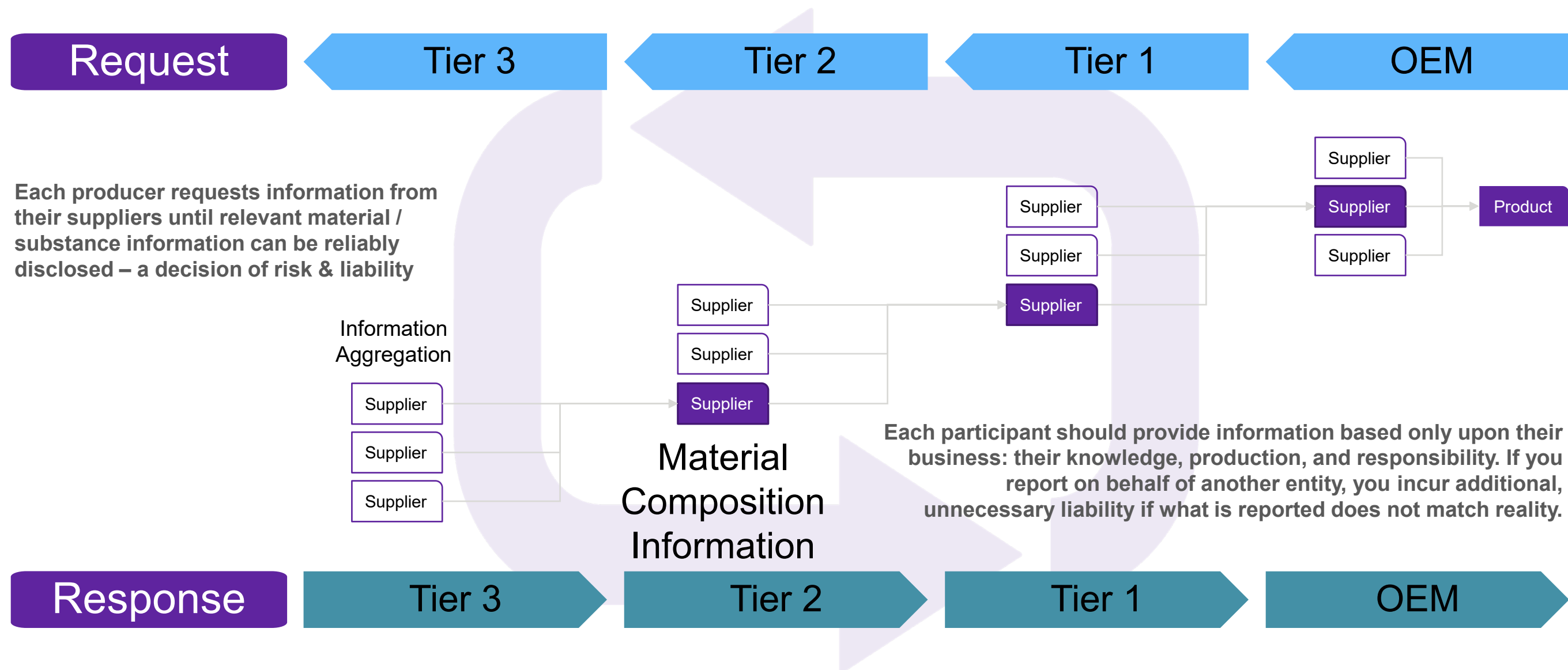
- Information exists in many different places and in different forms, therefore, companies need various systems to receive the information

Data Analysis Inconsistency Across the Industries:

- Consumers at downstream end have their own means of analysis, while upstream suppliers possess the knowledge

Sourcing of Compliance Data

DXC Philosophy: The direct manufacturer of a product best understands that product



CDX: DXC's Proven Solution for Chemical Management

IMDS use is reserved exclusively for the on-road vehicle industry, with a few exceptions for similar product manufacturers willing to accept the stricture that only Automotive and On-Road vehicle OEMs have a voice in IMDS capabilities

CDX leverages the proven functionality and knowledge of DXC with IMDS, along with our expertise in Cloud solutions, to provide manufacturers with a secure, centralized web application which accurately gathers and analyzes material content data throughout your entire global supply chain.

CDX uses an established, common framework that provides quality global reporting to various legal requirements for a range of products, whatever you manufacture, assemble or sell.

CDX: One solution to support many regulations

Filter REACH Annex XIV

REACH

Printed Circuit Board Assembly

0.01 - 0.05% PCB-Capacitor surface (8c)

100.0% PCB-e-plate SnPb3 (electrodeposited Tin-Lead Coatings)

0.01 - 0.2% Carbon

0.0 - 0.04% Sulphur

2.0 - 5.0% Lead

Rest 96.375% Tin

0.1 - 0.5% PCB-Ceramic capacitors <125 V AC, <250 V DC (10c), High Component Load

100.0% PCB-ceramics with lead (10c), High Comp Load

0.0 - 0.5% Diboron-trioxide

Rest 75.2% Barium-titanium-trioxide

2.0 - 5.0% Bismuth titanium oxide

0.0 - 0.5% Lead titanium zirconium oxide

8.0 - 10.0% Neodymium Titanate

0.1 - 1.0% Lead-monoxide

0.5 - 3.0% Lead-titanium-trioxide

0.0 - 0.5% Ruthenium(IV)oxide

4.0 - 8.0% Silica, vitreous

0.5 - 2.0% Miscellaneous

1.0 - 3.0% Zinc oxide

0.01 - 0.05% PCB-High Temp solder (8e)

Carbon Steel (1010)

Rest 99.405% Iron

0.595% Confidential Substances

2.0 - 5.0% PCB-Solder S-Sn96Ag3Cu1(Sn96,5Ag3Cu0.5)

100.0% PCB-Solder S-Sn96Ag3Cu1(Sn96,5Ag3Cu0.5)

Rest 95.744% Tin

0.0 - 0.1% Lead

0.0 - 0.1% Antimony

0.0 - 0.1% Bismuth

0.0 - 0.1% Cadmium

0.3 - 0.7% Copper

0.3 - 0.7% Indium

2.8 - 3.2% Silver

0.0 - 0.001% Aluminium (metal)

0.0 - 0.03% Arsenic

0.0 - 0.02% Iron

0.0 - 0.001% Zinc (metal)

Filter RoHS

RoHS

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Filter Conflict Minerals

Conflict Minerals

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& Others!

Standard Levels of reporting

ONE-LEVEL DECLARATIONS

Declaration of conformance/ compliance (DoC) Requires attachment specifying regulatory scope of conformance

PARTIAL DECLARATIONS

Reports substances in specified scope, i.e. regulation or declarable substance list (DSL)
Substances not within the specified scope are not required

FULL MATERIAL DECLARATION (FMD) OR 100% DECLARATION

The weight of reported substances equals the weight of finished product, +/- tolerance. Confidential or proprietary substances not in regulatory scope may be masked or not disclosed, often up to a defined threshold, e.g. in Automotive, the limit is 10%

CDX provides the following advantages when multiple industry members use the shared service

Benefits of a common industry reporting solution

Permits the entire supply chain to see the same information at the same time.

Regulatory updates are available to all at the same time; no delay while requests transverse the supply chain

Allows industry analyses for regulatory impacts without disclosing specific impacted parties

Regulators often approach our industry representatives for impact analysis before enacting restrictions

Accelerates supplier response through use of standardized declarations shared across multiple clients

Less overhead work on administration of client requests yields higher quality declarations with lower cost

Education and Training costs are shared and reduced

Suppliers using the same system to report consistently for multiple clients to learn that system more thoroughly

There is added safety in using a limited number of common, shared solutions industry-wide

Outliers draw added scrutiny and criticism from regulators than a group with a consistent, uniform approach

Benefits of Using CDX

CDX provides the following advantages to its customers:

Saves manual effort, time and money while gaining a better overview, higher quality data and faster access to information for compliance reporting

Provides data efficiency by showing only the information related to a company's products, and requests material information for components and materials from that company's suppliers, resulting in more efficient data collection

Meets industry requirements for reporting and analysis

Requires no investment for hardware or software, or costly, time-consuming implementation projects

Aggregates information while providing high-level security and confidentiality

Uses services in a flexible manner, based on a "pay per use" approach

Works well within all industries and geographies

Regulation and chemistry updates are provided by DXC and its partners, reducing costs and overhead

Reasons DXC recommends striving for Full Material Disclosure

FMD, e.g. IMDS-style reporting, offers the most bang for the buck

- The greatest capability for data validation
- A measure of future-proofing against new and/or changed regulations
- Maximizes sustainability benefits beyond risk avoidance
- Reduce total cost & effort necessary to maintain product compliance

Declarations to a regulation or DSL scope

- Have limited value when regulations and/or products change
- Require constant re-solicitation of supply chain to remain updated to last year's requirements

One-level declarations often lack supporting documentation

Salesman: What answer do I give so you buy my product?



Anything other than FMD is comparable to driving forward while looking backwards!

FMD can significantly improve reporting quality

- ✓ CDX automatically conducts more than 100 validation checks
- ✓ The email or file submissions you receive from your suppliers generally contain erroneous data
- ✓ It's difficult to ensure data accuracy, even when using industry standard formats
- ✓ You receive more accurate, higher quality Material Data Sheet (MDS) supplier submissions, which saves you and your suppliers time and money, while improving your MDS quality

DXC Enhances CDX several times each year

- The needs of our new and existing customers are at the center of everything we do.
- Many CDX enhancements come from ongoing dialogue with our customers.
- Ongoing enhancements and refinements ensure that CDX best serves our customers' compliance requirements, both today and in the future.
- We stay ahead of new and changing compliance regulations across all industries.
- Everyone using CDX sees changes simultaneously eliminating the lag in supply chain updates that plague other solutions



Each CDX Release has been focused on:

2017

- System / Infrastructure
- Material Declaration Enhancements (Primary)
- Conflict Mineral Declaration Enhancements
- Broader Compliance / Responsibility / Sustainability

2015

2013

Usually 3 Releases each year

2011

2011: First Release 1.0

CDX Evolution

2018

CDX Focus continues to be on MDS, CMD REACH, RoHS, Safe Use Instructions

2019

2020

2021

2021 Releases: 7.5, 7.4, 7.3

- CDX now makes use of the referencing mechanism in SCIP Dossiers for own MDSes
- SCiP support the creation of SCIP Dossiers upon acceptance of supplier parts, making it possible to also use these for SCIP referencing
- CDX now supports full export to IEC62474
- CMRT 6.01: Full support for EU Conflict Minerals Reporting
- IAEG AD-DSL version 4.0 support in CDX
- CDX Web Services Enhancements
- Filter for deactivated projects in MDS Request and CMD Request inbox and other places

Benefits of Using CDX



Automation

- Saves manual effort, time and money while gaining a better overview, higher quality data and faster access to information for compliance reporting
- Aggregates information while providing high-level security and confidentiality



Cost Model

- Uses services in a flexible manner, based on a “pay per use” approach
- Requires no investment for hardware or software, or costly, time-consuming implementation projects



Cross Industry Solution

- Globally, meets industry requirements for reporting and analysis and Works well within all industries
- Data efficiency, provides only the information related to a company’s products, and requests material information for components and materials from that company’s suppliers, resulting in the most efficient data collection



Security

- Data Security at no additional cost

CDX Addresses Requirements of Different Industries

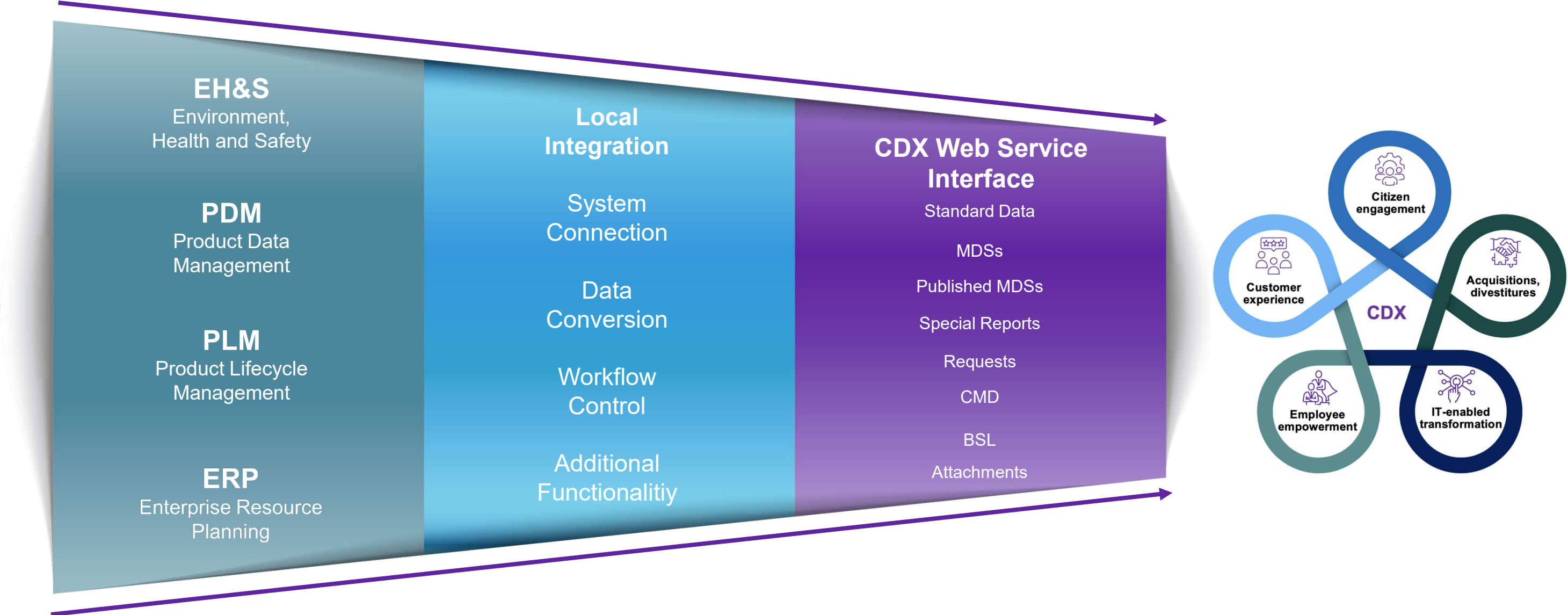
CDX, leveraging on 20 years of IMDS experience, is a more flexible materials compliance management solution and has open rules (e.g., full material or partial material declarations, one level) suitable for all industries.

- **Substance and Material Management**
 - Centrally provided catalog of substances and materials ensures data quality
 - More than 10,000+ standard metals with compositions and norms
- **Embedded Workflow Management**
 - Through CDX inbox and outbox, user can forward MDSs and CMDs quickly and transparently to customers and suppliers.
- **Analyses and Reports**
 - With DXC CDX, you can analyze an individual MDS, several in-house MDSs or several suppliers' MDSs according to the source and disposition statement
- **Embedded Conflict Minerals Declaration (CMD) Manager**
 - Supports creating a CMD report.
- **SAP — Integration with Client's Systems**
 - Interface to exchange data between CDX and client's systems using CDX Webservices interface
- **CDX multi-industry clientele helps avoid the “Group Think” phenomenon.**
 - When you collaborate only with others who do similar work, it is easy for an approach to seem like the correct solution, even when it isn't.



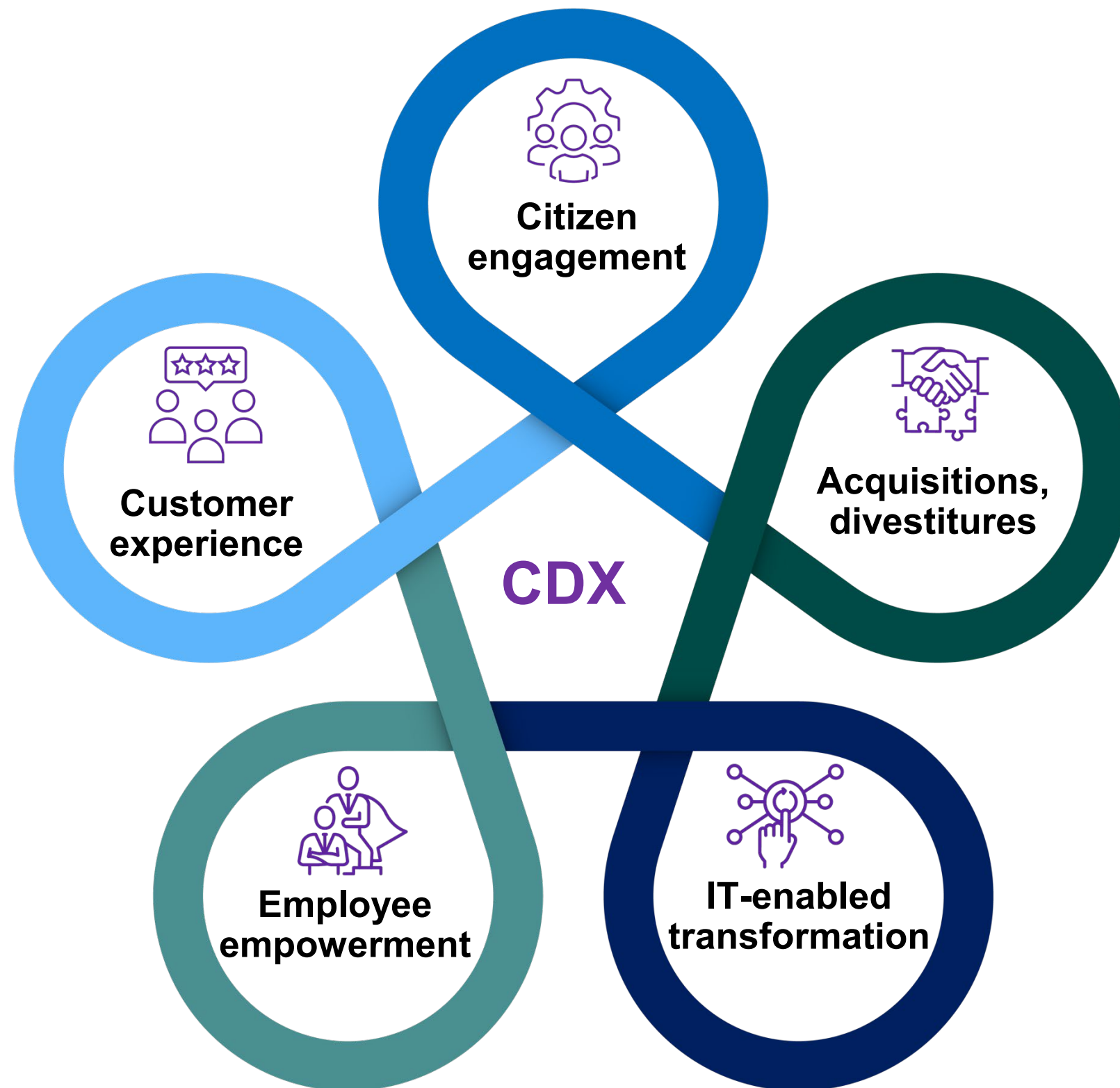
Integration of Information Using CDX Web Service

Connect collected information with your internal systems and processes



CDX – Backed by the Strength of DXC Technology New, but not born yesterday

*From the leading pure-play
supplier in cloud services, material
compliance solutions, and secure
supply chain submissions for over
20 years*



CDX Helps to Onboard Your Suppliers

CDX connects you with suppliers registered in CDX and if suppliers are not yet registered, then CDX can generate e-mails to inform them about your needs

Supplier



MDS requests
←
→
MDS



Pure substance
Pure substance groups
Basic materials

MDS
Pure substance
Pure substance groups
Basic materials



In-house System e.g. SAP EHSM

MDS requests

