

Data Retention Standard

Purpose and Scope

This Standard sets out the requirements on how data must be managed, and the general data retention periods and key contacts at Wood.

Data retention is important at Wood as it allows us to:

- Preserve valuable records.
- Maximize business efficiency by eliminating records that no longer serve a useful business purpose.
- Meet client and regulatory requirements by deleting aged, inaccurate, irrelevant, and unnecessary data.
- Maintain data storage costs at an appropriate level.
- Reduce risk by deleting redundant data.

This is an internal document, it does not give any third parties rights arising from or related to its application and/or Wood’s data.

Wood Personnel are accountable for efficient data management and should apply the data retention periods and processes in this Standard in accordance with their role at Wood and with support from Information Custodians in their Business Unit or Group Function. This Standard applies to all Wood Personnel, meaning all employees, including short-term workers and consultants working within Wood, and statutory directors or other officers of John Wood Group PLC and its subsidiaries.

Applicability – Mandatory

Table of Contents

1.0	Key Roles and Responsibilities	2
2.0	Data Retention.....	2
3.0	Abbreviations and Definitions.....	4
4.0	Revision History.....	4
5.0	Author/Checker/Owner.....	5
6.0	Appendices	5

Data Retention Standard

1.0 Key Roles and Responsibilities

Business Units and Group Functions are responsible for ensuring they have processes to comply with this Standard.

1.1 Information Custodians

Information Custodians are appointed by the Business Units and Group Functions. Information Custodians are responsible for:

- Identifying Records to be maintained or preserved.
- Enforcing the general data retention periods and any business, legal and regulatory exceptions, and other requirements of this Standard in respect of their Business Unit or Group Function.
- Developing and maintaining any specific Business Unit or Group Function data governance process required to give effect to this Standard, for example approval and destruction procedures.
- Applying the Retention and Deletion Step Process and the Data Retention Schedule Directive.
- Supporting IT and Legal, Contracts, Ethics and Compliance in the maintenance and update of this Standard with updates on local and regional requirements and the appropriate retention periods based on those requirements.
- Establishing security restrictions for identified Records and ensuring alignment with local privacy laws in collaboration with the Legal, Contracts, Ethics and Compliance team where required.
- Approving Data Removal of identified Records in accordance with the relevant Business Unit or Group Function approval process.
- Approving the archive of any hard copy Records.

1.2 Wood Personnel

The Data Retention Schedule sets out general data retention periods together with a summary of Exceptions. Wood Personnel should apply the Data Retention Schedule to Data at Wood and where questions arise, seek guidance from the Information Custodian for the applicable Business Unit or Group Function.

2.0 Data Retention

Data is a combination of Records and Non-Records. Records will be retained in accordance with the Data Retention Schedule. Non-Records do not have a defined retention period and will be retained and deleted in accordance with the applicable Business Unit or Group Function data governance process and business value attributed to the Non-Record.

2.1 Record Format, Classification and Storage

Electronic records are the primary record storage format at Wood. Where electronic storage is not possible or does not meet legislative or regulatory requirements, paper copy or other format or media shall constitute the primary record.

All Records must have key points of identification that describe the content as follows:

Electronic Records (Document based):

- Document Title
- Document Number
- Document Description
- Business Unit / Group Functional Owner Name
- Lead Representative Name
- Wood Internal Project Number

Data Retention Standard

- Client or Counterparty Reference Number
- Project Completion Date
- Document Type

Archived Hardcopy Records in Offsite Storage (Box based):

- Unique Bar Code
- Index Reference Number
- Itemized content description
- Business Unit / Group Functional Owner Name
- Lead Representative Name
- Wood Internal Project Number
- Client or Counterparty Reference Number
- Destruction Date

Archived hard copy Records will be accepted only as an approved exception managed by the Information Custodian. Hard copy Records must be stored in secure storage onsite or offsite.

The Information Custodian must maintain an index of archived hardcopy Records. Periodic reviews should be undertaken of all hard copy Records (both unarchived and archived) to ensure that Data Removal takes place after the end of the applicable retention period.

The above Electronic Records and Archived Hardcopy Records classification data must be accessible and auditable.

2.2 Approval and Destruction Process

Each Business Unit or Group Function shall have its own specific data governance process in respect of approvals for Record destruction. That process must ensure that destruction certificates are properly completed for each Record subject to Data Removal and such certificates are effectively retained.

2.3 Data Retention Schedule Directive

- The Data Retention Schedule is based on common global retention periods for the general record type identified.
- Record retention periods within this schedule are the minimum requirements.
- Each Wood Business Unit and Group Function is responsible for determining the appropriate retention period for its Records.
- Exceptions are built into the Data Retention Schedule based on local legislative and regulatory requirements at the Standard date.
- Wood Personnel and Information Custodians must follow the Retention and Deletion Step Process through every stage from the Trigger Date to destruction of the Records.
- Wood Personnel and Information Custodians should consider specific local legal and regulatory requirements and apply these where appropriate. Contact Legal, Contracts, Ethics and Compliance for support where required.
- If you have Data which includes Personal Data and has reached the end of its retention period, but the Data cannot be deleted due to technical reasons, please consider protecting the Personal Data included in that Data by using techniques of pseudonymisation, anonymisation or Putting Beyond Use. Contact privacy@woodplc.com for guidance on applying these techniques.
- The Record Types and Exceptions in the Data Retention Schedule are not exhaustive.
- If there is no defined record type or retention period for the data being managed, or Wood Personnel are aware of a specific business case, legal, contractual, regulatory, or professional obligation which requires data to be kept for a longer or shorter period than specified, it is the responsibility of Wood Personnel and Information

Data Retention Standard

Custodians to determine the appropriate retention period and follow the relevant Business Unit or Group Function data governance process.

3.0 Abbreviations and Definitions

Term	Description
Business Units	means the Operations, Projects, Consulting, and Investment Services business units of Wood.
Data	means a combination of Records and Non-Records.
Data Removal	means deletion, disposal (including shredding) of Data and Records, including “putting beyond use”, pseudonymization and anonymization of Personal Data in such Data and Records.
Data Retention Schedule	means the schedule of retention periods set out in the Appendix of this Standard.
Exceptions	means the specific exceptions detailed in the final column of the Data Retention Schedule and the general exceptions of Legal Hold, HSE, Contract, and any local legal, regulatory or professional retention requirements as shown in the Retention and Deletion Step Process.
Group Functions	means the corporate functional teams of Wood, including Finance, Tax & Treasury, Investor Relations, Marketing & Communications, Insurance, Internal Audit, Legal, Contracts, Ethics and Compliance, Information Technology and Strategy.
Information Custodians	means those responsible for records management in their role at Wood. This includes Information Managers, Project Managers, Project Controllers and Documents Controllers.
Non-Records	means working documents, drafts documents, other documents, Microsoft messages and emails which no longer have business value after a short period of time and have no specified retention period.
Personal Data	means any information identifying directly or indirectly a natural person such as a name, address, date of birth, an identification number, location data, economic data, or more sensitive personal data such as race, ethnicity or health data.
Putting beyond use	means Wood: <ul style="list-style-type: none">is not able, or will not attempt, to use the data to inform any decision in respect of any individual or in a manner that affects the individual in any way.does not give any other organisation access to the personal data.surrounds the personal data with appropriate technical and organisational security; andcommits to permanent deletion of the information if, or when, this becomes possible.
Records	means all business and regulatory required information which is created, received, or maintained in the transaction of Wood business, or in pursuit of Wood’s legal and contractual obligations and which have a specified retention period.
Retention and Deletion Step Process	means the step process set out in the Appendix of this Standard.
Trigger Date	means the start date for calculating the duration of the retention period for Wood Records. Trigger Dates are identified in the Data Retention Schedule.

4.0 Revision History

Rev	Date	Summary of Changes
0	08 July 2024	New document issued for use, replaces COP-POL-110001 and COP-STD-110001.

Data Retention Standard

5.0 Author/Checker/Owner

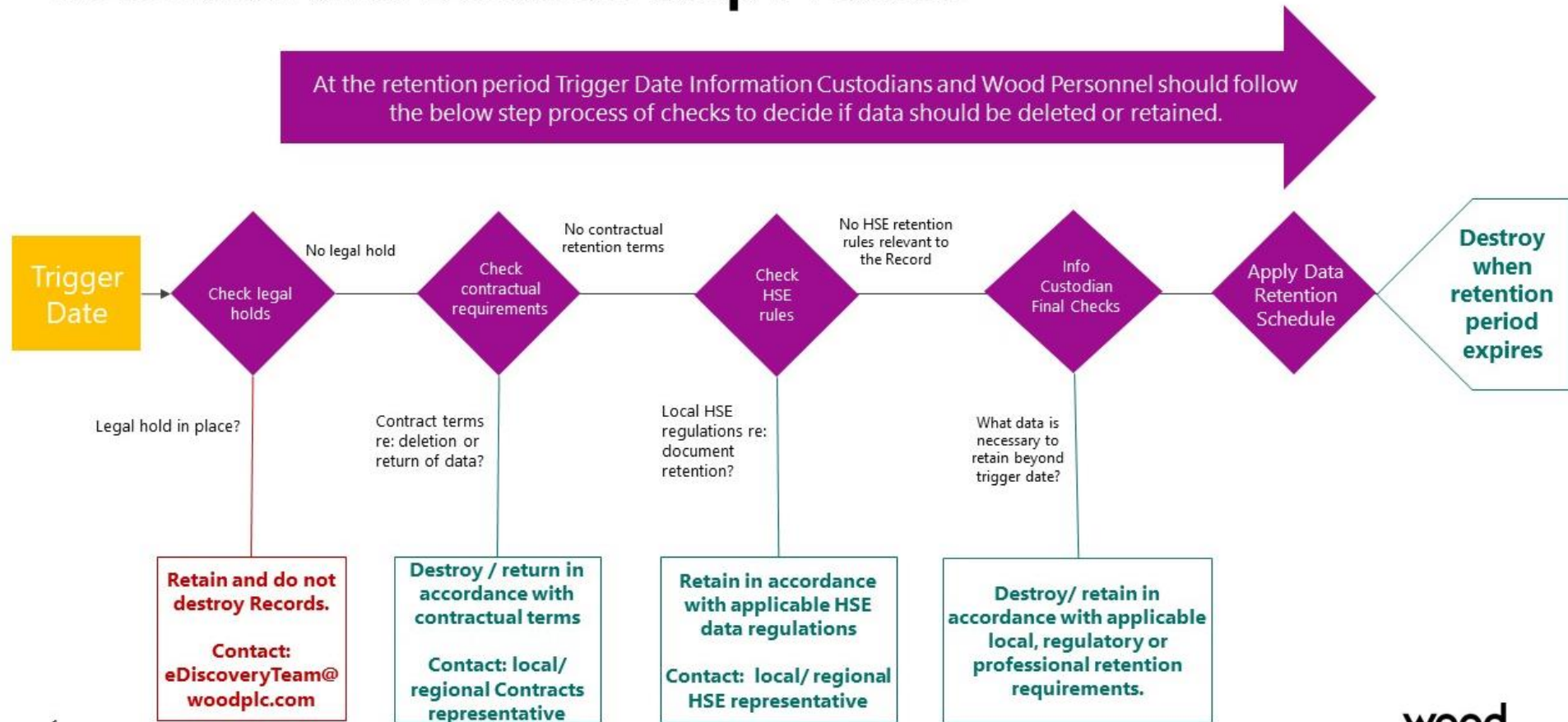
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6.0 Appendices

Retention and Deletion Step Process

Data Retention Schedule

Retention and Deletion Step Process



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Data Retention Standard

6.2 Data Retention Schedule

Record Type	Record Sub-Types	Minimum Retention Period	Trigger Dates	Exceptions
Project and Contract Records	All data relevant to a project which must be retained under the project contract, for example: File share information SharePoint site Project shared mailbox Project engineering or design applications Project information bases Engineering deliverables Communications with clients and third parties Expenditure Authorizations	12 years	The applicable: <ul style="list-style-type: none"> Project completion date or Warranty end date or Litigation hold end date (whichever is the latest date)	Exceptions: <ul style="list-style-type: none"> Thailand (10 years for vendor details) HSE Records: please confirm the applicable retention period with your HSE representative. Contract records executed as a deed must be retained for 12 years or the specific time period set out in the non-disclosure agreement.
		2 years	from unsuccessful tender date	
	All contractual documents which must be retained in respect of Wood business transactions: Proposal, Tender and Bid documentation Contractual documents (client and supplier) Parent company guarantees Bonds or Letters of credit Contract delivery documentation Licences and registrations Purchase Orders Change Orders Export / Import Documentation			
HSE Records	There are various health and safety laws and regulations across the globe with varying retention periods depending on the type of data. Please contact your local HSE representative for guidance on the applicable data retention period for the record under consideration.			
IT Records	Application Data Structured and non-structured data excluding data that supports Records e.g. Oracle	3 years	Date of Creation	
Corporate Records	Insurance policies Company Secretarial records, e.g. annual reports, corporate filings, acquisition and disposal data, director information, board meeting notes	In perpetuity	Date of creation	Exception: Capital Stock and Bond Records (10 years from transaction date)

Data Retention Standard

Record Type	Record Sub-Types	Minimum Retention Period	Trigger Dates	Exceptions
Insurance, Litigation and Compliance Records	Insurance claims Litigation and insurance records eDiscovery records Compliance records Settlement agreements not executed by Deed	7 years	Settlement date or final award date	
	Settlement agreements by Deed	12 years	Settlement date	
Intellectual Property Records	IP Registrations Co-Existence Agreements Settlement Agreements	10 years	From the date in which the trademark(s) covered by the agreement no longer subsist.	Exception: Patent applications, registrations and assignments (30 years from filing date) Settlement agreements executed as a deed must be retained for 12 years.
Quality Records	Corrective & Preventative Actions Reports Client Satisfaction Surveys Certifications	12 years	Date of creation	
Audit Records	Documentation recording audit process Evidence requested Conclusions of audit.	7 years	From the date the audit was created	
Finance Records	Tax returns	7 years	Later of tax return due date or the tax return submission date	U.S. general Exception: All documents associated with a tax return submission under which a loss has been incurred or claimed in the U.S. must be retained in perpetuity or until the loss is realised. Please contact Wood U.S. Tax team before applying deletion to finance documents.
	Payroll Records		Date of termination of employment for payroll records	Payroll records Exceptions: <ul style="list-style-type: none"> • Brazil – 5 years after record creation • Spain - 6 years after termination date • Thailand – 10 years after termination date • South Africa – 5 years after termination date • Italy – 10 years after termination date
	Accounts payable ledgers and schedules Bank statements, Billing and payment records (including invoices)		Date of the record for other finance records	Employee Bank Details Exception: <ul style="list-style-type: none"> • Employee bank details should be deleted 2 years after their employment termination date.

Data Retention Standard

Record Type	Record Sub-Types	Minimum Retention Period	Trigger Dates	Exceptions
HR Records	Wood Worker Data: Recruitment data Pre-employment checks Employee personnel record or files CVs Absence records Training records Maternity/ paternity or other leave data	7 years	From termination date	Country Exceptions: The following countries have their own specific rules in respect of HR Record retention. Please contact your local HR Representative or applicable Information Custodian for further guidance on retention periods in your region: Brazil, Spain, New Zealand, Germany, Kuwait, Australia, South Africa, Qatar, Kazakhstan, Italy, Vietnam, and South Korea. General Exceptions: There are general exceptions for the following types of HR Records, please contact your local P&O Representative or applicable Information Custodian: <ul style="list-style-type: none"> • Identity documents and right to work checks • Pre-placement tests • Maternity, paternity and other family leave records • Holiday records • Accident records/ reports
	Wood Candidate Data: Recruitment data Pre-employment checks CVs	4 years	From unsuccessful application (where the candidate never became an employee)	Country exception and General exceptions as above apply.
Marketing and Comms Records	Marketing, videography images for events	2 years	Date last accessed	
	Client Relationship Management (CRM)	4 years	Last contact date	