

INFORMATION MANAGEMENT AND RECORDS  
RETENTION

# INFORMATION MANAGEMENT AND RECORDS RETENTION

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**INFORMATION MANAGEMENT AND RECORDS  
RETENTION****CONTENT**

<b>1. SCOPE</b>	<b>3</b>
<b>2. REFERENCES</b>	<b>3</b>
<b>3. DEFINITIONS</b>	<b>4</b>
<b>4. ORGANIZATION</b>	<b>4</b>
<b>5. PROCEDURE</b>	<b>5</b>
5.1 RESPONSIBILITIES	5
5.2 RETENTION AND PROTECTION OF RECORDS	6
5.3 DISPOSING OF RECORDS	6
5.4 DATA PRIVACY REQUIREMENTS	6
5.5 LEGAL HOLD (LEGALLY REQUIRED SUSPENSION OF RECORDS DESTRUCTION)	7
5.6 CONFLICT OF RETENTION PERIODS	7
5.7 ACQUISITIONS OR DIVESTITURES	7
5.8 DEPARTING EMPLOYEE INFORMATION	7
5.9 IMPLEMENTATION AND TRAINING	8
<b>6. APPENDICES AND FORMS</b>	<b>8</b>

**INFORMATION MANAGEMENT AND RECORDS  
RETENTION**

**Page: 3/8**

## **1. SCOPE**

All employees and contracted workforce of a Technip Energies Entity (collectively referred to as “Employees”) shall comply with this Standard. The purpose of this Standard is to provide guidelines governing the retention, disposal and management of Technip Energies’ records, which includes the following:

- Ensure that company information is preserved and accessible for appropriate periods of time, and as required by the laws and regulations of applicable jurisdictions, including the EU General Data Protection Regulation 2016/679 (“GDPR”).
- Reduce operational costs through efficient data identification and eliminating the retention and storage of records not necessary for legal or business reasons.
- Comply with the national, federal, state, and local regulations in each country where Technip Energies operates related to retention of certain types of records.
- Comply with contractual obligations related to records retention
- Preserve archival information of historical significance to the company and enhance identification, recovery and delivery of such information.
- Safeguard essential and vital information required for the company to recover and to continue to do business in the event of a disaster.
- Preserve records relevant to any ongoing or expected disputes, litigation, audits, or government investigations.
- Ensure that information is properly destroyed in a manner consistent with the nature of the information to ensure compliance with laws and regulations that apply to such information, as well as in compliance with the company’s legal obligations to customers, vendors, etc.

This Standard applies to all Records created, received, or maintained in the course of Technip Energies’ business, including the business of all domestic and foreign affiliates, regardless of the content of such records, their format, or their location.

The Records Retention Schedule (RRS), see GPS-COR-24033, implements this Standard and details the retention and disposal requirements for business records at the Company.

The essential terms of this Standard are set forth below and are based on ISO-15489-1:2016 Information and documentation - Records Management.

## **2. REFERENCES**

GPS-COR-15019	Data Privacy Standard
GPS-COR-24011	Information and Cybersecurity Principles
GPS-COR-24012	Information Asset Management Standard
GPS-COR-24029	Information Protection Standard
GPS-COR-24033	Records Retention Schedule (RRS)
GPS-COR-24036	Physical Records Disposition & Withdrawals
ISO 15489-1:2016	Information and documentation - Records Management

[Technip Energies Standards](#) site.

## INFORMATION MANAGEMENT AND RECORDS RETENTION

Page: 4/8

### 3. DEFINITIONS

**Entity/Entities** - A duly registered company in a specific jurisdiction, and its branches and representation offices.

**Business Owner** – Person who manages the processes in their area(s) of responsibility in GBPMS.

**Operating Center Delegate (OD)** – Person nominated by Business Owner's at an operating center to be a liaison to Records and Information Management (RIM) for implementation and deployment of records lifecycle management.

**Official Records** - Records created, received and maintained in pursuance of legal obligations.

**Personal Information** – Information that identifies an individual or relates to an identifiable individual, such as name, email address, postal address, phone number, etc.

**Records** - Information created, received or converted, and maintained as evidence and information by a Technip Energies entity, employee or contractor in the transaction of business, regardless of media which includes electronic or physical content.

**Records Retention Schedule (RRS)** - A control document which describes the records of the company at the record series level indicating the length of time each series of records is to be maintained.

**Retention Period** - The time records must be kept according to operational, legal, regulatory and fiscal requirements. If unique contractual requirements are longer, you maintain the records for the longer period.

**Unofficial Records** – Copies of originals, working papers, mark-ups, drafts, or shadow files (regardless of media type) which have a limited and defined business purpose for Technip Energies and are not required to be retained for business continuity or legal reasons.

Note: Abbreviations, Acronyms, and Terms definitions are also available in the Global Glossary.

Access Global BPMS Glossary from [here](#).

### 4. ORGANIZATION

Responsibility and activity are summarised in the following matrix:

<b><u>Responsibility Matrix Legend:</u></b> R = Responsible for performing the action A = Accountable to ensure action happens. Only one A in case of more R C = Consulted during the action I = Informed after the action has completed	Legal	Records and Information Management (RIM)	Information and Digital Services (IDS)	Operating Center Delegates (OD)	Business Owners (BO)	All Employees
1. Manages administration, communication, and training on this Standard	I	A, R	R	R	-	I
2. Responsible for establishing system and controls, enforcing this Standard, and ensuring implementation processes and procedures are properly executed	I	A	R	R	R	I
3. Manages retention and protection of records and information	I	A, R	R	R	I	I
4. Administers disposition of records and information	R	A, R	R	R	R	-

**INFORMATION MANAGEMENT AND RECORDS  
RETENTION**

**Page: 5/8**

**Responsibility Matrix Legend:**

R = Responsible for performing the action  
A = Accountable to ensure action happens.  
Only one A in case of more R  
C = Consulted during the action  
I = Informed after the action has completed

	Legal	Records and Information Management (RIM)	Information and Digital Services (IDS)	Operating Center Delegates (OD)	Business Owners (BO)	All Employees
5. Administers data privacy requirements	A	R	R	I	I	-
6. Administers legal holds	A, R	R	R	I	C	-
7. Complies with business contracts or other legally binding agreements pertaining in any respect to records retention	C	R	R	R	A	-
8. Administers the handover of records obtained through an acquisition for review and categorization consistent with this Standard	C	R	R	R	A	-
9. Responsible for ensuring that all records are properly identified and secured when an employee leaves the company	-	C	C	-	A	-
10. Responsible for nominating a OC Delegate(s) (OD) to be a liaison to RIM for implementation and deployment of records lifecycle management	-	C	-	-	A, R	-

## **5. PROCEDURE**

### **5.1 RESPONSIBILITIES**

All Employees are personally responsible for compliance with this Standard, and will be responsible for recommending, administering and supporting Records and Information Management (RIM) Standards and procedures. As part of this responsibility Employees shall:

- Take steps to properly disposition messages received via messaging systems, such as email, voice mail and instant messaging. Employees shall periodically delete voicemail messages and will comply with automatic deletion of e-mails on a periodic basis in accordance with any e-mail retention schedule (except those subject to Legal Hold below). Messages or attachments that are Records for which the RRS specifies a retention period shall be moved outside of the messaging system to network storage systems that can more properly enforce retention policies.
- Not use .PST files to permanently retain Records in email messages.
- Not use non-company email accounts (AOL, Gmail, Yahoo, Hotmail, etc.) for company communications.
- Move Official Records to an appropriate governed storage area e.g. save the message files and store in appropriate project or business-related folder.
- Not retain Unofficial Records in either paper or digital form more than a year after the respective project or matter is concluded.

Management is responsible for establishing appropriate system and controls, as well as enforcing the Standard and ensuring implementation processes and procedures are properly executed.

**INFORMATION MANAGEMENT AND RECORDS  
RETENTION****Page: 6/8**

The following elements are fundamental to ensure proper management of Technip Energies' Records:

- Identification and categorization of Records that support the processes of the business organization or unit;
- System(s) (manual or electronic) designed and implemented to capture, organize, secure, make accessible, and manage identified Records, including retention of Official Records in an approved Technip Energies repository for the duration of their lifecycle according to RRS.
- Summary listing of how and where records are stored, retention requirements, and other information.

Failure to comply with this policy could adversely affect Technip Energies' business and/or result in serious legal repercussions. It is mandatory that all Employees comply with this Standard. All business lines, departments, and Employees are required to review their Records annually to determine what action, if any, must be taken to be in full compliance with this Standard. Employees who violate the requirements of this Standard will be subject to disciplinary action.

## **5.2 RETENTION AND PROTECTION OF RECORDS**

All Records shall be stored in a climate-controlled environment. Access and environmental controls, monitoring and authorized destruction of records shall be implemented to prevent unauthorized viewing, modifications or purging of records.

Storage of records off-site (paper, cloud or other storage locations) shall also comply with this Standard. Cloud storage shall only be on IDS-approved company cloud storage providers. Physical paper records shall be stored in Records and Information Management approved off-site repositories to ensure the lifecycle of the records is managed to include application of legal holds when required. Physical records stored off-site or electronic records maintained on collaborative database sites shall be destroyed at the expiration of the applicable retention period.

The retention and disposal requirements for Records shall be directed by the RRS; see GPS-COR-24033.

(Note: Backups are managed by Information & Digital Services (IDS).)

## **5.3 DISPOSING OF RECORDS**

On an annual basis, records that have been maintained for the applicable retention periods as indicated in the RRS shall be purged or destroyed. Records containing Personal Information or other sensitive information, as identified in the RRS, shall be disposed using methods appropriate to the security level of such records and local legislation. Authorization for destruction of Records may be obtained from [Records and Information Management](#); see GPS-COR-24036.

## **5.4 DATA PRIVACY REQUIREMENTS**

Technip Energies will retain Personal Information in a form enabling identification of an individual for as long as necessary for the purposes for which the Personal Information was obtained. In order to be able to comply with this, Technip Energies will: (1) define and document the purposes for which Personal Information is collected; (2) maintain records of what Personal Information has been collected for what purposes; and (3) appropriately delete and destroy records that include Personal Information in accordance with the retention period for the specific Personal Information contained in such records. See GPS-COR-15019.

In connection with GDPR, Technip Energies will also:

- Process Personal Information lawfully, fairly and in a transparent matter (including by the provision of appropriate notice to individuals that sets forth retention periods);

INFORMATION MANAGEMENT AND RECORDS  
RETENTION

Page: 7/8

- Collect Personal Information for specified explicit and legitimate purposes that are adequate, relevant and necessary for the purposes for which they are processed;
- Enable individuals in appropriate cases to ask for the deletion of their Personal Information, such as when consent to the processing of such Personal Information is withdrawn.

Notwithstanding the foregoing, Technip Energies may retain Personal Information to:

- Comply with specific retention duties under European Union Member State laws, such as if a specific state law requires that the Personal Information be stored for a specific period of time;
- To engage in permitted “secondary purposes” beyond the specified, explicit and legitimate specific purposes of the initial collection, such as scientific or historical research purposes or statistical analysis, subject to appropriate technical and organizational measures to minimize the data retained (such as ensuring that the information is pseudonymized or otherwise cannot be associated with an individual); and
- Pursue Legal Hold as per below.

#### 5.5 LEGAL HOLD (LEGALLY REQUIRED SUSPENSION OF RECORDS DESTRUCTION)

In case of actual or potential litigation, government investigations, or other circumstances that Legal advises shall warrant suspension of records destruction, Legal may decide that records shall not be destroyed per RRS. Hence, any Employee who becomes aware of any of the said occurrences shall immediately notify the Managing Attorney or any other designated Litigation representative.

Suspension of records destruction will commence when a legal hold is in place.

#### 5.6 CONFLICT OF RETENTION PERIODS

Technip Energies may enter into legally binding agreements, including business contracts or consent orders, which require the Company to retain certain types of business records for specified periods of time. To the extent that such agreements do exist and require retention for periods of time in excess of what is required by this Standard, the longer retention period is controlling. It is the responsibility of the Business Owner to ensure that all necessary steps are taken to comply with business contracts or other legally binding agreements pertaining in any respect to records retention. Questions concerning such agreements should be directed to the Legal department.

#### 5.7 ACQUISITIONS OR DIVESTITURES

In the event that Technip Energies acquires all or part of another company, all of the acquired company’s business Records that are transferred to Technip Energies must be treated consistently with all other Technip Energies Records under the terms of this Standard. Thus, following the completion of any acquisition, all records obtained through the acquisition are to be reviewed and categorized consistent with this Standard. Records subject to destruction must be destroyed.

Acquisitions in some cases may result in material changes in the nature or scope of Technip Energies’ business, which in turn could necessitate changes to the RRS or to this Standard.

When selling all or part of the company, records to be transferred to new ownership will be identified and delivered to the acquiring company in accordance with the terms of the acquisition agreement and applicable legislation.

#### 5.8 DEPARTING EMPLOYEE INFORMATION

When an individual terminates employment with the company for any reason, all company records in the employee’s possession or control must be left with Technip Energies and may not be altered or

**INFORMATION MANAGEMENT AND RECORDS  
RETENTION****Page: 8/8**

duplicated by or for the departing employee. These records are company property and must be retained and managed by continuing employees.

It is the responsibility of the immediate supervisor to ensure that all records are properly identified and secured when an employee leaves the company. The supervisor is responsible for maintenance of these records in accordance with this standard until such records are either legally destroyed or transferred to another employee with ongoing responsibility for the job functions relating to the records being kept.

**5.9 IMPLEMENTATION AND TRAINING**

Necessary controls, for this Standard, will be put in place through the implementation of records systems, delivery of process, and adherence to the standards and procedures in BPMS. Training will be made available to all Employees on acceptable practices for the management of records. Senior managers shall reinforce these practices. Each employee has the responsibility for understanding their roles and responsibilities for managing company records that they have in their custody or that are generated through their business processes.

Each Business Owner is responsible for nominating an OC Delegate(s) (OD) to be a liaison to RIM for implementation and deployment of records lifecycle management. OD's may be assigned by operating center, group/department or country as needed based on records/information volumes and workloads.

**6. APPENDICES AND FORMS**

Not applicable