

## PHYSICAL RECORDS CIRCULATION

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## **CONTENT**

<b>1.</b>	<b>SCOPE</b>	<b>3</b>
<b>2.</b>	<b>REFERENCES</b>	<b>3</b>
<b>3.</b>	<b>DEFINITIONS</b>	<b>3</b>
<b>4.</b>	<b>ORGANIZATION</b>	<b>4</b>
<b>5.</b>	<b>PROCEDURE</b>	<b>4</b>
5.1	PHYSICAL RECORDS CIRCULATION	4
5.2	PROCESS	5
5.3	RECORDKEEPING	5
<b>6.</b>	<b>APPENDICES AND FORMS</b>	<b>5</b>
6.1	APPENDICES	5
6.2	FORMS	5

## PHYSICAL RECORDS CIRCULATION

Page: 3/9

**1. SCOPE**

This Global Practice Standard (GPS) provides direction on the process of retrieving and returning inactive physical records from/to archival storage. This Standard is applicable to all Technip Energies entities (the “Company”).

The Company has an obligation to retain records for certain periods of time (minimum and/or maximum requirements), and Records and Information (RIM) has oversight for how we manage these processes. Each location shall apply this Standard and incorporate this practice into local workstreams in support of standardizing how we manage our physical records and information.

**2. REFERENCES**

GPS-COR-15019	Data Privacy Standard
GPS-COR-24029	Information Protection Standard
GPS-COR-24032	Information Management and Records Retention
GPS-COR-24033	Records Retention Schedule
GPS-COR-24036	Physical Records Disposition & Withdrawals
ISO 15489-1:2016	Information and documentation – Records Management

[Technip Energies Standards](#) site.

**3. DEFINITIONS**

**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.

**Records and Information Management (RIM)** is the field of management responsible for establishing and implementing policies, systems, and procedures to capture, create, access, distribute, use, store, secure, retrieve, and ensure disposition of an organization’s records and information.

**Business Owner (BO)** - Management level employee who has ownership and responsibility for retention of records generated from their business process(es). Authorizes the destruction and permanent withdrawal of official records under their responsibility that have met the end of their retention lifecycle.

**RIM Global Contacts** – You can locate your Records and Information Management contact details on our T.ENET page: <https://intranet.technipenergies.com/sites/records-management-site/SitePage/269462/global-contacts>

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

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

## PHYSICAL RECORDS CIRCULATION

Page: 4/9

### 4. ORGANIZATION

Responsibility and activity are summarised in the following matrix:

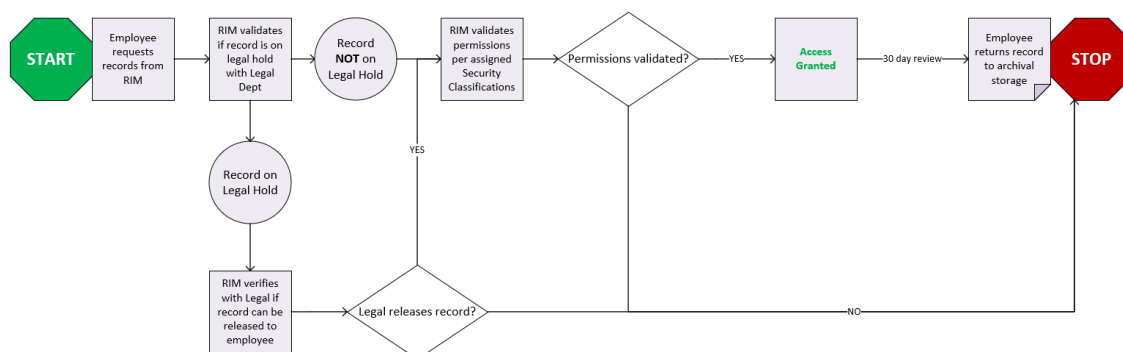
**Responsibility Matrix Legend:**  
R = Responsible for performing the action  
A = Accountable to ensure action happens.  
Only one A in case of more R  
C = Consulted during the action  
I = Informed after the action has completed

	All Employees	Business Owners (BO)	Operating Center Delegates (OD)	Records and Information Management (RIM)	Legal
1. Request records	R	-	R	A, R	-
2. Verify records holds	I	-	I	A, R	C
3. Authorize permission	I	R	I	A	-
4. Retrieve records	C	-	R	A, R	-
5. Track records custodianship	C	-	R	A, R	-
6. Return records to archival storage account	C, I	-	R	A, R	-

### 5. PROCEDURE

#### 5.1 PHYSICAL RECORDS CIRCULATION

Archival physical records are available to employees for consumption throughout the duration of the records lifecycle based on permissions. The standard period of time for reviewing retrieved records is thirty days; however, you may request an extension for the retrieval should your business need exceed the thirty-day period. If records need to be transferred to another entity due to an asset sale or divestiture, see **Physical Records Disposition & Withdrawal GPS-COR-24036**. The employee does not have to return any electronic copies downloaded from digital media like CDs and should securely purge the copies once they are no longer needed, which cannot exceed the life of the original record. Herein describes the process of records circulation.



## 5.2 PROCESS

### 5.2.1 RETRIEVE RECORDS

1. Employee shall send a request to their local RIM professional, or OD, (see [Global Contacts](#)) providing details about the record(s) such as the box barcode number, creating department, project information, employee names/termination dates or any specific information that could assist in locating the requested records.
2. RIM/OD will verify the requestors permissions to the requested record(s) per the **Information Protection Standard, GPS-COR-24029** (see 6.1 Appendix) then seek Legal approval for the retrieval of any records on legal hold.
3. RIM/OD will initiate an archival work order and have the records delivered to the designated location.
4. RIM/OD confirms receipt at designated location and updates system with the current location of the records.

### 5.2.2 REVIEW RECORDS

The care and custody of the records are transferred to the requesting employee, who then takes responsibility for maintaining the integrity of the assets until they are returned to archival storage. The employee shall handle the records following these conditions:

- Records shall be handled with care, regardless of media.
- Records shall be stored in an environmentally controlled space that is between 65-72°F (18-22°C) away from windows with humidity controls in place and devoid of plants and/or bugs.
- Records shall be maintained in the same condition and organizational arrangement as received from archival storage.
- Records shall be secured to ensure confidential and sensitive information is not exposed.

### 5.2.3 RETURN PHYSICAL RECORDS

1. RIM/OD routinely reviews a report on checked out physical records and follows up with employees who have temporary custody of records from archival storage that are past due.
2. The employee notifies RIM/OD that the checked-out records can be returned to archival storage.
3. RIM/OD schedules a pick-up to return the physical records to archival storage.
4. RIM/OD confirms the archival system reflects the boxes have been returned to storage.

## 5.3 RECORDKEEPING

Records Circulation Audit

## 6. APPENDICES AND FORMS

### 6.1 APPENDICES

APPENDIX 1: Security Classifications

### 6.2 FORMS

Not Applicable.

PHYSICAL RECORDS CIRCULATION

Page: 6/9

APPENDIX 1: Security Classifications

Security Classification	Definition	Application	Record Types
Public	Business information intended for public consumption.	Distribute as requested.	Advertising Company Publications Promotional Assets Public and Media Relations
General	Business information not intended for public consumption, but which may be shared externally with certain third parties for an authorized business purpose.	Consult with business owner before distributing to third party. Distribute internally as requested.	Annual Reports to Shareholders Business Licenses and Permits Certificates of Insurance Charitable Giving Chemical Inventories and Lists Departmental Processes Diving Equipment Environmental Monitoring Environmental Permits Facilities Management and Maintenance General Correspondence and Working Papers General Reference and Research Government Statistical Reporting Hazardous Waste Disposal Office Equipment Manuals Policies and Procedures Safety Compliance – Work Permits and Routine Safety Inspections Safety Meetings Shareholder Annual Meeting Shipping and Receiving Vehicle Ownership
Confidential	Business information that could cause damage to the business in the event of unauthorized disclosure.	Do not distribute externally without authorized consent in writing from business owner and Legal. Consult with business owner before distribution within Company.	Aftermarket, support and service project documentation Agency Correspondence Air Emissions Testing Registers Association Memberships Capital Assets Construction and Commissioning Records Contracts Corporate Archives

PHYSICAL RECORDS CIRCULATION

Page: 7/9

			<p>Customer Complaint</p> <p>Disposition and Destruction Documentation</p> <p>Driver Logs and Vehicle Inspection Reports</p> <p>Electronic System Monitoring</p> <p>Emergency Disaster Planning</p> <p>Employee Awards and Relations</p> <p>Engineering Administration and Design Records</p> <p>Environmental Remediation</p> <p>Facilities Records</p> <p>Financial Records</p> <p>General (internal) Project Files</p> <p>Governance Records</p> <p>Government Inspections – HSE</p> <p>Hardware Documentation</p> <p>Help Desk</p> <p>HSE Internal Audits, Inspections and Reports</p> <p>HSE Planning and Assessment</p> <p>Incident Investigation Reports</p> <p>Insurance Bonds</p> <p>Insurance Policies</p> <p>Internal, External and Vendor Audits</p> <p>Investment and Foreign Exchange</p> <p>Investor Relations</p> <p>IT Security and Compliance</p> <p>Legal and Regulatory Opinions</p> <p>Legislative and Regulatory Activities</p> <p>Litigation files</p> <p>Manufacturing Records (all)</p> <p>Noncompliance Citations</p> <p>Operational Reports and Analysis</p> <p>Political Action Committees</p> <p>Process Safety Management</p> <p>Product Inventory</p> <p>Product Pricing</p> <p>Project Proposals</p> <p>Proxy Statement and Voting Records</p>
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PHYSICAL RECORDS CIRCULATION

Page: 8/9

			Purchase Orders Real Property Records Indices Regulatory Correspondence Remote Operating Vehicles (ROV) Report Writers and Data Warehouses Safety Cases – Offshore Installations, Vessels and Platforms Safety Compliance – Confined Space Safety Tests Shareholder Stock Transactions Software Programs Strategic Planning System Architecture Records System Backup Files Tax records ( <i>excluding Compensation Tax Forms, see Highly Confidential</i> ) Training Records Unclaimed Property Vendor Selections and Bidding Documentation Vessel Ownership Records
Highly Confidential	Business information that could cause serious damage to the business in the event of unauthorized disclosure.	Do not distribute internally or externally without authorized consent in writing from Business Owner/Legal.  <i>Note: There could be additional data privacy requirements that must be considered; see GPS-COR-15019.</i>	Banking Records Benefits Records Board of Directors' Evaluations Closing Documents Compensation Tax Forms Corporate Compliance Diving Services Documents from Prospects – Unconsummated Drug and Alcohol Testing Due Diligence Analysis Employee Hazardous Exposure Monitoring and Audiometric Testing Employee Medical File Employee Personnel File Employee Recruitment Immigration and Naturalization



PHYSICAL RECORDS CIRCULATION

Page: 9/9

			<p>Intellectual Property – Patents, Copyrights and Trademarks</p> <p>Internal Investigations</p> <p>Manufacturing Research and Development</p> <p>Market Research and Planning</p> <p>Noise and Vibration Exposure Monitoring and Testing</p> <p>Occupational Accidents Involving Fatalities</p> <p>Payroll Accounting</p> <p>Personnel Accident or Injury</p> <p>Salary Administration</p> <p>Vehicle Incident Records</p> <p>Workers Compensation</p> <p>Workforce Reports</p>
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