



## Group Data Retention Policy

*This Policy seeks to set out data retention periods applicable to a variety of document types likely to be held by the Group. The periods for which documents/records should be held are set out in the applicable Record Retention Schedule attached to this Policy. The retention periods shown in the Record Retention Schedule are the periods applicable to the retention of records in England and Wales. Operating Units are to consider the retention periods as a default position however, they are free to obtain local legal advice in respect of the length of the retention periods applicable in the jurisdictions in which they are domiciled.*

### Personal Data

Please note that records containing personal data (see the Data Protection Policy for more details) should be retained only for as long as it is necessary to retain them, in light of the purpose for which they were created/collected, and must be destroyed once it is no longer necessary to retain them. Therefore, in addition to minimum retention requirements, Operating Units should also be considering whether there is an actual legal requirement or need to retain the documents/records for the entire retention period indicated in the Records Retention Schedule. Furthermore, personal data held should be rendered anonymous in so far as this is possible. Further information can be found in the Group Data Protection Policy.

### Purging of Documents

Documents which have been held longer than the record retention periods detailed in the Record Retention Schedule must be deleted/destroyed. This includes documents produced in electronic format. Operating Units are encouraged to undertake a regular document purge in order to accord with this Policy.

### Records Champion

Operating Units are encouraged to nominate a Data Lead who is responsible within the business for monitoring the retention and destruction of records held by the Operating Unit and for implementing the procedures which may be required to ensure compliance with this Group Policy.

## RECORD RETENTION SCHEDULE

### Accounting, Banking and Finance Records

Document/Record Description	Retention Period
<b>Annual Reports and Financial Statements</b> Including budgets and any periodic reports/statements	Permanently
<b>Asset Records</b> Documentation for fixed or capital assets	Permanently
<b>Audit Functions</b> <ul style="list-style-type: none"> <li>• Internal and external</li> <li>• Financial audits</li> </ul>	Creation of record + 7 years
<b>Audit Reports – Independent</b> Prepared by independent auditor	Permanently
<b>Banking Records</b> Reconciliation, cash receipts, cash management, check registers, cheques (including cancelled cheques) and bank statements	Creation of record + 6 years
<b>Credit Records</b> Including (but not limited to): Ratings, marketing reviews, credit information, receivable reports, correspondence, credit applications and supporting documentation	Creation of record + 6 years
<b>General Accounting Records</b> Including (but not limited to): <ul style="list-style-type: none"> <li>• Accounts receivable (A/R) and accounts payable (A/P)</li> <li>• Appropriations requests</li> <li>• Blanket orders</li> <li>• Corporate budgets</li> <li>• Debit/credit notes</li> <li>• Sales analysis</li> <li>• Sales and cost records</li> <li>• Expense reports and records</li> <li>• General ledgers</li> <li>• Insurance premiums</li> <li>• Inter-company receipts and invoices</li> <li>• Manual invoices and receipts</li> <li>• Purchase orders</li> <li>• Month end records</li> <li>• Trial balances</li> </ul>	Creation of record + 7 years
<b>Internal Financial Statements and Reports:</b> <ul style="list-style-type: none"> <li>• Budgets</li> <li>• Cash flow analysis</li> <li>• Income statements</li> </ul>	Creation of record + 7 years
<b>Inventory Records</b> All equipment and other property owned or leased by the Operating Unit.	Permanently

<b>Investments</b> Stocks, bonds, mutual funds and other financial instruments	Creation of record + 6 years
<b>Loans</b> Agreements, bonds, mortgages, debt instruments, applications, notes, debentures, amortization schedules and supporting documents	Maximum of 10 years from completion of loan
<b>Work papers</b> Any papers supporting corporate reporting	Creation of record + 7 years

### Health & Safety & the Environment

Document/Record Description	Retention Period
<b>General Policies, Guidelines and Procedures:</b> Including, but not limited to: <ul style="list-style-type: none"> <li>• Health &amp; Safety Policies and Procedures</li> <li>• Persons at Risk Procedures</li> <li>• Accident and Emergency Plans</li> <li>• Medical and Health Programmes</li> </ul>	Permanently
<b>Risk Assessments and Conclusions:</b> including: <ul style="list-style-type: none"> <li>• Fire Risk Assessment</li> <li>• Noise Exposure Assessments</li> <li>• Hazardous Substances Hazardous to Health</li> <li>• COSHH compliance assessments</li> <li>• Significant findings of an Asbestos risk assessment</li> </ul>	Until a further assessment has taken place which renders the previous one obsolete.
<b>Employee Records:</b> Details of exposure to hazardous substances and materials in the Operating Unit workplace Records might include: <ul style="list-style-type: none"> <li>• Name and job classification of employee</li> <li>• Details of investigations and results</li> <li>• Details including make, model and series number of equipment involved in incident.</li> <li>• Maintenance records in respect of equipment</li> <li>• Type(s) of protection worn by employee</li> <li>• Any plan or work of remediation required/implemented</li> </ul>	Creation of record + 40 years
<b>Other Health and Safety Incident Logs:</b> Including, but not limited to: <ul style="list-style-type: none"> <li>• Annual summary of incidents</li> <li>• Health and Safety logs/forms</li> <li>• Logs of work-related injury/illness (Accident book)</li> <li>• Referrals to local health and safety regulators/official bodies</li> </ul>	Creation of record + 3 years
<b>Hazard Communications:</b> <ul style="list-style-type: none"> <li>• Disclosure notices or communications to Operating Unit employees informing them of the presence of hazardous materials (as required by local Health and Safety law (if any))</li> <li>• Documents/files maintained in compliance with governmental requirements</li> </ul>	Creation of record + 40 years

Document/Record Description	Retention Period
<ul style="list-style-type: none"> <li>Records of specialist employee training programmes, hazardous chemicals and protective measures</li> <li>Minutes of consultations with safety representatives/committees.</li> </ul>	
<b>Hazardous Waste Records</b> Records relating to the discharge, recovery, transfer, delivery and Hazardous waste itself.	5 years from date of activity relating to hazardous waste
<b>Labeling files</b> General information regarding the labelling of Operating Unit products	Product discontinued + 30 years
<b>Plant/Site Environmental Due Diligence Documents</b> Environmental status of property/facility during Operating Unit's ownership	Divestiture of property or business + 30 years
<b>Plant/Site Environmental files:</b> <ul style="list-style-type: none"> <li>Data collected from environmental testing and monitoring devices</li> <li>Emergency responses to environmental incidents</li> <li>Emission summaries and waste logs</li> <li>Handling and transportation of hazardous materials</li> <li>Permits, orders, emissions and other records relating to compliance with environmental laws regulations</li> <li>Pollution abatement requests/orders and spillage clean-up information.</li> <li>Property/facilities operation and maintenance procedures for startup, shutdown and malfunction</li> <li>Records of maintenance and examination of Asbestos</li> </ul>	Permanently
<b>Product Health and Safety Information</b> Operating Unit brochures, catalogues, advertising and other materials regarding product health and safety information (other than product labeling).	Creation of record + 26 years unless an issue identified, in which case to be retained permanently.
<b>Safety/Environmental Audit Reports</b>	Creation of record + 5 years unless the Audit identifies an issue; in which case to be retained permanently.
<b>Radiation Assessments and Records</b> Including incident records and reports	Creation of record + 50 years (or until the person exposed to radiation reaches the age of 75)

### Human Resources Records

Document/Record Description	Retention Period
<b>Recruitment only (NOT HIRED):</b> <ul style="list-style-type: none"> <li>Applications</li> <li>Background checks</li> <li>Evaluations</li> <li>Physical examinations including drug/alcohol screenings</li> <li>Curriculum Vitae/Resumes</li> </ul>	Recruitment completion + 6 months
<b>Employment Records (HIRED employees):</b> <ul style="list-style-type: none"> <li>Employment application <ul style="list-style-type: none"> <li>Curriculum Vitae/Resumes</li> <li>Qualifications and References</li> </ul> </li> </ul>	Termination of employment + 6 years (however, any personal data to be kept no longer than is necessary for the purpose collected).

Document/Record Description	Retention Period
<ul style="list-style-type: none"> <li>– Offer Letters</li> <li>– Letters of appreciation or recognition</li> <li>• New employee <ul style="list-style-type: none"> <li>– Induction records</li> <li>– Appraisals (ideally in original copy)</li> <li>– Performance improvement reports</li> <li>– Disciplinary matters records</li> <li>– Job history</li> <li>– Requested time-off documentation</li> <li>– Signed Policies</li> <li>– Training Records</li> <li>– Resignation/termination /retirement letters</li> </ul> </li> <li>• Payroll Records: <ul style="list-style-type: none"> <li>– Authorizations for changes in positions/wages/salaries</li> <li>– Bank statements and reconciliations</li> <li>– Employee name, address, date of birth, occupation</li> <li>– Overtime, bonuses, benefits and payments in kind</li> <li>– Annual Leave pay records</li> <li>– Pay rate</li> <li>– Payroll deduction authorizations</li> <li>– Payroll registers</li> <li>– Payroll tax filings under PAYE or other local employee tax regime</li> <li>– Salary changes</li> <li>– Time cards/sheets</li> <li>– Vacation/holiday pay records</li> <li>– Maternity pay records</li> </ul> </li> <li>• Medical Records <ul style="list-style-type: none"> <li>– Employees’ work-related medical records</li> <li>– Sickness/absences records</li> <li>– Medical records submitted for family/medical leave purposes</li> </ul> </li> <li>• Driver information <ul style="list-style-type: none"> <li>– DVLA Information, Driving licence, motor insurance information, MOT certificates</li> </ul> </li> </ul>	
<p><b>Other Personal Information:</b></p> <ul style="list-style-type: none"> <li>• Banking information</li> <li>• Employee personal data form – (emergency contact and address information)</li> </ul>	Completion of employment + 6 months.
<p><b>Company Directors’ Records:</b></p> <ul style="list-style-type: none"> <li>• Directors' service contracts</li> <li>• Any contract made between a Director and the Company</li> <li>• Pension/benefit details</li> </ul>	Termination of employment + 10 years

Document/Record Description	Retention Period
<b>Severance Package Records</b>	Termination of employment + 10 years
<b>Unemployment Compensation Records</b>	Creation of record + 6 years
<p><b>Any action plans or records relating to compliance with local employment / labour laws</b>, including in relation to:</p> <ul style="list-style-type: none"> <li>• Equal Opportunities</li> <li>• Working Hours</li> <li>• Disability</li> <li>• Discrimination</li> </ul>	<p>6 years from event giving rise to action (e.g. discrimination) and at least 1 year after termination of employment (whichever is the longer)</p> <p>Working hours - To show compliance with statute: 2 years</p> <p>Working hours opt-out forms: 2 years after opt-out rescinded or ceased to apply</p>
<p><b>Employment Related Benefits - Records:</b></p> <ul style="list-style-type: none"> <li>• Dental Plans and Policy information</li> <li>• Medical Plans and Policy information</li> <li>• Life Insurance Plans and policy information</li> <li>• Death in Service Plans and policy information</li> <li>• Other employee benefit programmes</li> <li>• Disability Plans (short term and long term).</li> </ul>	Discontinuation of benefits + 8 years
<p><b>Pension Scheme Records (including occupational schemes)</b> including:</p> <ul style="list-style-type: none"> <li>• All details of pension scheme (including: payments, participants, appointments, transfers, insurance, tax returns and disputes)</li> <li>• Contributions to pension scheme</li> <li>• Terms of appointment of advisers</li> <li>• Minutes of Pension meetings</li> <li>• Financial Records</li> <li>• Transfers (in/out) of scheme</li> <li>• Benefits calculations</li> </ul>	6 years from end of scheme year to which they relate
<p><b>Pension Scheme/Plan Details</b> Deceased Retiree</p>	<p>Where no widow/widowers or orphan pension payable: 6 years from end of scheme year in which death occurred or date of last transaction.</p> <p>Where widow/widowers or orphan pension payable: 25 years from end of scheme year in which death occurred (or until orphan completes higher education, if later)</p>
<p><b>Benefits - Eligibility/Enrollment Information:</b></p> <ul style="list-style-type: none"> <li>• Benefits paid to employees or their beneficiaries</li> <li>• Deductions reports including authorisations</li> <li>• Deferrals or matching contributions made for participating employees in pension plans</li> <li>• Determination of employees' eligibility to participate in plans</li> </ul>	Discontinuation of benefits + 8 years
<b>Disability Claim Files</b>	Date claim made + 10 years
<p><b>Immigration and Naturalization/Citizenship Service Documents:</b></p> <ul style="list-style-type: none"> <li>• Records used to document work permit or</li> </ul>	Validity of document + 3 years

Document/Record Description	Retention Period
hiring eligibility	
<b>Job Descriptions and Person Specifications</b> Duties, responsibilities and qualifications for roles	Role superceded + 6 years
<b>Trade Union Activity</b> including labour agreements, negotiations and reports	Termination of agreement/negotiation + 10 years

## Property

Document/ Record Description	Retention Period
<b>Property/Site Deeds and Records,</b> including: <ul style="list-style-type: none"> <li>– Easements and rights of way records</li> <li>– Leases, subletting documentation, licenses and proof of ownership (including title deeds to the extent available)</li> <li>– Architectural reports and structural surveys</li> <li>• Documents relating to the sale and purchase of property/sites</li> </ul>	Sale of property + 20 years
<b>Visitor logs</b>	Creation of record + 10 years
<b>Maintenance contracts and logs</b>	Creation of record + 6 years

## Intellectual Property Rights

Document/Record Description	Retention Period
<b>Documents evidencing the ownership and (if applicable) registration of intellectual property rights including:</b> <ul style="list-style-type: none"> <li>• Trade marks (including inactive trade marks);</li> <li>• Logos;</li> <li>• Registered designs;</li> <li>• Patents</li> <li>• Copyright</li> <li>• All other intellectual property rights</li> </ul>	Ownership: Life of IPR + 10 years.  Registration documents: 6 years after cessation of registration.
<b>Inventor files</b> New inventions or developments for which intellectual property rights (including patents) may arise	Life of IPR (remaining life of IPR) + 50 years
<b>Material for which copyright is claimed</b>	Copyright + 50 years
<b>Any patent application and related records</b>	Life of patent + 10 years
<b>Any intellectual property agreements/licenses/consents/assignments</b>	Termination + 6 years

## Operating Unit Records

Document/Record Description	Retention Period
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<b>Document/Record Description</b>	<b>Retention Period</b>
<b>Acquisition/Divestiture documents:</b> including copies of executed agreements, contracts, addendums and modifications	Permanently
<b>Acquisition/Divestiture - completed transactions</b> Records related to the acquisition or divestment, including due diligence documents	Acquisition / Divestiture + 6 years
<b>Acquisition/Divestiture - Incomplete Transactions</b>	Closure + 2 years
<b>Company documents:</b> Including: <ul style="list-style-type: none"> <li>• Incorporation Documents</li> <li>• Constitutional Documents (Articles and Memo of Association etc.)</li> <li>• All corporate minutes(including board minutes and minutes of shareholder meetings)</li> <li>• Copy resolutions made by the Operating Unit and by the board of directors</li> <li>• Operating Unit name change history</li> <li>• Copies of any court order affecting the Operating Unit</li> <li>• Powers of Attorney</li> </ul>	Permanently
<b>Statutory Registers:</b> <ul style="list-style-type: none"> <li>• Register of directors and the Company Secretary</li> <li>• Register of charges/mortgages and copy of all relevant documentation</li> <li>• Register of directors' declaration of interest in any company transactions</li> <li>• Copies of other information and documents filed with national register of companies eg Companies House in the UK (if any).</li> </ul>	Permanently
<b>Shares in the Company and Dividends, which may include:</b> <ul style="list-style-type: none"> <li>• Register of shareholders</li> <li>• Share applications and acceptance documentation</li> <li>• Statement of issued share capital</li> <li>• Documentation relating to the transfer of stock or shares</li> <li>• List of dividend and interest payments made</li> <li>• Details of any purchase or cancellation of own shares, including copy contract</li> </ul>	Permanently
<b>Export and Import Records</b>	Creation of record + 6 years
<b>All policies, manuals procedures and standards</b>	Life of Operating Unit
<b>Pricing information</b> General pricing information for Operating Unit products	Creation of record + 6 years  Contract prices: 6 years from termination of contract or the end of year to which prices relate.  General/standard/catalogue price lists: 6 years from end of the relevant period for which the prices applied.

Document/Record Description	Retention Period
<b>Records Management - Destruction Documentation</b>	Permanently
<b>Records Management - Retention Schedules</b>	Permanently
<b>Records relating to storage of data</b>	Two years after records disposed of

### Legal and Contract Management

Document/Record Description	Retention Period
<b>Environmental</b> Environmental records	Creation of record + 25 years
<b>Litigation files:</b> <ul style="list-style-type: none"> <li>• Arbitration/Mediations or other ADR</li> <li>• Case files</li> <li>• Employment Law claims</li> </ul>	Date of Judgment + 7 years
<b>Products</b> Legal Reviews/Opinions	Creation of record + 20 years
<b>Contracts entered into by Operating Unit and executed as a deed</b>	Termination/expiry of contract + 12 years
<b>All other contracts entered into by Operating Unit</b> Including standard terms and conditions for supply, purchase etc	Termination/expiry of contract + 6 years
<b>Customer account files:</b> Including: <ul style="list-style-type: none"> <li>• Advances and remittance</li> <li>• Competitive activity reports</li> <li>• Complaints and claims</li> <li>• Orders, purchase orders, pricing, invoices and rebates</li> <li>• Supplier/Vendor records</li> </ul>	Creation of record + 7 years

### Site Records

Document/Record Description	Retention Period
<b>Capital Investment Project files:</b> Approvals, calculations and drawings	Asset Life + 15 years
<b>Engineering and Technical files:</b> Approvals, close-out sheets and registers	Closure of record + 10 years
<b>Equipment Retirement/End of Life Information</b>	Creation of record + 2 years
<b>Facility/Site Effectiveness Surveys</b>	Creation of record + 6 years
<b>Gas and Electric usage files</b>	Creation of record + 5 years
<b>Inventory/stock management files:</b> Quantity, type and descriptions of material in stock, to be shipped or received	Creation of record + 6 years
<b>Product Certifications:</b> Includes finished goods audit and quality control records	Creation of record + 7 years
<b>Production records</b>	Creation of record + 3 years
<b>Shipping and scheduling files:</b> <ul style="list-style-type: none"> <li>• Bills of Lading</li> <li>• Shipments in or out of facility</li> </ul>	Creation of record + 7 years
<b>Work orders</b>	Creation of record + 2 years

## Research and Development

Document/Record Description	Retention Period
<b>Cancelled Specifications/Test Methods</b> – Electronic	Closure of test + 10 years
<b>Engineering drawings</b>	Closure of record + 10 years
<b>Product literature and advertising</b>	Creation of record + 26 years
<b>Laboratory notebooks</b>	Closure of record + 10 years
<b>Engineering records</b> Development and optimization records, drawings, reports, operating methods, pictures, process data, performance measures, models, trial data, and energy usage data	Closure of record + 10 years
<b>Product development:</b> Factory reports/studies	Closure of record + 10 years
<b>Any Product Proposals</b>	Creation of proposal + 25 years
<b>Quality Control documents:</b> Daily quality control, laboratory, raw materials, and equipment	Creation of record + 4 years
<b>Research Reports</b>	Creation of record + 50 years
<b>Equipment and Site testing documentation</b> - Electronic or otherwise (including details of test results and actions taken)	Creation of record + 20 years
<b>Testing Facilities</b> Standard Operating Procedures and Revisions	Creation of SOP's + 10 years

## Risk Management and Loss Control

Document/Record Description	Retention Period
<b>Claims files (including correspondence)</b> - Liability	Date of Judgment + 5 years
<b>Claims files</b> - Property	Closure of matter + 12 years
<b>Engineering loss prevention files</b> Reports and recommendations for loss prevention issues at Operating Unit locations	Creation of record + 5 years
<b>Insurance policies/certificates and renewal notices:</b>	Termination or expiry of Policy + 10 years (or as long as claims can be made under the Policy)
<b>Insurance policies/certificates and renewal notices:</b> <ul style="list-style-type: none"> <li>• Excesses</li> <li>• Liability</li> <li>• Employee/workers insurance policies and claims</li> <li>• Any claims arising under policies.</li> </ul>	Permanently
<b>Insurance policies/certificates and renewal notices:</b> <ul style="list-style-type: none"> <li>• All other policy types</li> <li>• Property</li> </ul>	Termination of policy + 6 years
<b>Claims Lost</b> Reports from claims handlers	Creation of record + 5 years
<b>Quality complaint reports/logs and warranty claims</b>	Closure of matter + 7 years

## Tax

Document /Record Description	Retention Period
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Document /Record Description	Retention Period
<b>Acquisitions</b> (Tax returns relating to acquisition or acquired companies)	Permanently
<b>Audit</b> Records related to supporting Operating Unit's position in tax audits	Tax Year + 7 years
<b>Audit Reports - Independent</b> Prepared by independent auditor	Permanently
<b>Divestments</b> Tax issues for divested subsidiaries	Divestiture + 7 years
<b>Any exemption certificates</b>	Permanently
<b>All tax records and returns:</b> Including (but not limited to): <ul style="list-style-type: none"> <li>• International</li> <li>• Property</li> <li>• Sale and Use</li> <li>• VAT records</li> <li>• PAYE records</li> <li>• Corporation Tax</li> </ul>	Tax Year + 7 years

#### Information Management and Personal Data

Document/ Record Description	Retention Period
<b>Policies and procedures on the management and security of data/records</b>	Permanently
<b>Consents for certain types of "direct marketing" under local privacy laws</b>	While still active on the marketing list
<b>Requests to be removed from marketing lists</b>	Until that person has been removed. (Note: Name should be added to a permanent exception/suppression list for future reference).
<b>Consents for the processing of personal data (unless exemption under local law applies)</b>	For as long as that personal data is processed (but no longer than is necessary for the purpose supplied/collected).
<b>Records regarding access/disclosure requests for data held by Operating Unit</b>	10 years (but no longer than is necessary for the purpose supplied/collected).

#### Past Employee Emails

Document/ Record Description	Retention Period
<b>Email Accounts and Emails of employees who no longer work for the Operating Unit/Group</b>	No longer than 12 months beyond their leave date.