



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

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

Health & Safety & the Environment

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

Document/Record Description	Retention Period
<ul style="list-style-type: none"> Records of specialist employee training programmes, hazardous chemicals and protective measures Minutes of consultations with safety representatives/committees. 	
Hazardous Waste Records Records relating to the discharge, recovery, transfer, delivery and Hazardous waste itself.	5 years from date of activity relating to hazardous waste
Labeling files General information regarding the labelling of Operating Unit products	Product discontinued + 30 years
Plant/Site Environmental Due Diligence Documents Environmental status of property/facility during Operating Unit's ownership	Divestiture of property or business + 30 years
Plant/Site Environmental files: <ul style="list-style-type: none"> Data collected from environmental testing and monitoring devices Emergency responses to environmental incidents Emission summaries and waste logs Handling and transportation of hazardous materials Permits, orders, emissions and other records relating to compliance with environmental laws regulations Pollution abatement requests/orders and spillage clean-up information. Property/facilities operation and maintenance procedures for startup, shutdown and malfunction Records of maintenance and examination of Asbestos 	Permanently
Product Health and Safety Information 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.
Safety/Environmental Audit Reports	Creation of record + 5 years unless the Audit identifies an issue; in which case to be retained permanently.
Radiation Assessments and Records 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
Recruitment only (NOT HIRED): <ul style="list-style-type: none"> Applications Background checks Evaluations Physical examinations including drug/alcohol screenings Curriculum Vitae/Resumes 	Recruitment completion + 6 months
Employment Records (HIRED employees): <ul style="list-style-type: none"> Employment application <ul style="list-style-type: none"> Curriculum Vitae/Resumes Qualifications and References 	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"> – Offer Letters – Letters of appreciation or recognition • New employee <ul style="list-style-type: none"> – Induction records – Appraisals (ideally in original copy) – Performance improvement reports – Disciplinary matters records – Job history – Requested time-off documentation – Signed Policies – Training Records – Resignation/termination /retirement letters • Payroll Records: <ul style="list-style-type: none"> – Authorizations for changes in positions/wages/salaries – Bank statements and reconciliations – Employee name, address, date of birth, occupation – Overtime, bonuses, benefits and payments in kind – Annual Leave pay records – Pay rate – Payroll deduction authorizations – Payroll registers – Payroll tax filings under PAYE or other local employee tax regime – Salary changes – Time cards/sheets – Vacation/holiday pay records – Maternity pay records • Medical Records <ul style="list-style-type: none"> – Employees’ work-related medical records – Sickness/absences records – Medical records submitted for family/medical leave purposes • Driver information <ul style="list-style-type: none"> – DVLA Information, Driving licence, motor insurance information, MOT certificates 	
<p>Other Personal Information:</p> <ul style="list-style-type: none"> • Banking information • Employee personal data form – (emergency contact and address information) 	Completion of employment + 6 months.
<p>Company Directors’ Records:</p> <ul style="list-style-type: none"> • Directors' service contracts • Any contract made between a Director and the Company • Pension/benefit details 	Termination of employment + 10 years

Document/Record Description	Retention Period
Severance Package Records	Termination of employment + 10 years
Unemployment Compensation Records	Creation of record + 6 years
<p>Any action plans or records relating to compliance with local employment / labour laws, including in relation to:</p> <ul style="list-style-type: none"> • Equal Opportunities • Working Hours • Disability • Discrimination 	<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>Employment Related Benefits - Records:</p> <ul style="list-style-type: none"> • Dental Plans and Policy information • Medical Plans and Policy information • Life Insurance Plans and policy information • Death in Service Plans and policy information • Other employee benefit programmes • Disability Plans (short term and long term). 	Discontinuation of benefits + 8 years
<p>Pension Scheme Records (including occupational schemes) including:</p> <ul style="list-style-type: none"> • All details of pension scheme (including: payments, participants, appointments, transfers, insurance, tax returns and disputes) • Contributions to pension scheme • Terms of appointment of advisers • Minutes of Pension meetings • Financial Records • Transfers (in/out) of scheme • Benefits calculations 	6 years from end of scheme year to which they relate
<p>Pension Scheme/Plan Details 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>Benefits - Eligibility/Enrollment Information:</p> <ul style="list-style-type: none"> • Benefits paid to employees or their beneficiaries • Deductions reports including authorisations • Deferrals or matching contributions made for participating employees in pension plans • Determination of employees' eligibility to participate in plans 	Discontinuation of benefits + 8 years
Disability Claim Files	Date claim made + 10 years
<p>Immigration and Naturalization/Citizenship Service Documents:</p> <ul style="list-style-type: none"> • Records used to document work permit or 	Validity of document + 3 years

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

Property

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

Intellectual Property Rights

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

Operating Unit Records

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

Legal and Contract Management

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

Site Records

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

Research and Development

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

Risk Management and Loss Control

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

Tax

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

Information Management and Personal Data

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

Past Employee Emails

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