



THE REINALT-THOMAS
CORPORATION

Records and Information Management Policy

9/15/2022

Amendments to this Policy will be posted on the Knowledge Center
and will be effective when posted.

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Revision	Description of Change	Date	Initials
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I. Overview and Purpose

Consistent with The Reinalt-Thomas Corporation and its affiliates' (the "Company") requirements and sound business practices, it is the policy of the Company to retain and manage its business, financial, employee, and other records and Information in accordance with guidelines, best practices, and procedures put forth by the Company's Information Lifecycle Management (ILM) program. All Company employees and personnel ("Employees") manage, protect, and maintain Company information in accordance with this Records and Information Management Policy ("RIM Policy"), the associated Records Retention Schedule (RRS), and guidance provided by ILM.

The purpose of the RIM Policy and the associated RRS is to establish requirements for the management of records and other information created, distributed, maintained, or received by the Company while promoting improved efficiency, cost savings, and business outcomes. This policy is to be interpreted in a way that best supports the following principles. In general, the Company manages its records and information in a way that:

- Complies with applicable legal and regulatory requirements;
- Supports business decisions and operations;
- Serves as complete and reliable evidence in connection with litigation and investigations; and
- Provides for the appropriate destruction of information that is no longer needed to transact business or satisfy legal requirements.

This Policy replaces all other records and information management policies. The associated Records Retention Schedule is the authority for retention time periods and supersedes all other guidance on data retention.

II. Scope

This Policy applies to Company employees, contractors, affiliates and subsidiaries and their management of records, information, and data generated, maintained, or received in the ordinary course of business regardless of medium, format, characteristics, or storage location.

III. Roles and Responsibilities

Information Lifecycle Management (ILM) Program. The Company's ILM program provides the framework, inclusive of policies, procedures, and guidelines, to facilitate compliance with the RIM policy and associated RRS.

RIM Policy Owner. The ILM Program Head serves as the general records manager for the Company's records and information assets, manages, supervises, and directs local departments, and is the custodian of this Policy. The ILM Program Head is accountable for RIM Policy implementation and will designate and supervise individuals who are responsible for implementation of this Policy.

Employees. Employees protect the security and confidentiality of information in their position, custody, or control. Information is maintained and destroyed as outlined in this Policy and the associated RRS. Employees participate in periodic reviews and audits to support and confirm the effectiveness of records and information management practices. Questions about the interpretation or implementation of this Policy should be directed to the ILM Program Head.

IV. Retention

The RRS identifies the Company's business records as well as other information created, maintained, or received in the normal course of business. The RRS is founded upon the Company's applicable recordkeeping requirements and considers Privacy laws in its determination of retention periods for information that includes personal information. Information is retained for the retention period specified by the RRS unless a legal hold or other administrative hold applies.

V. Destruction

Records are eligible for destruction when their Retention Periods specified in the RRS have expired, and there is no Legal Hold applicable to the information. Most records are destroyed at the end of their lifecycle; however, there may be records of historical value with an indefinite or permanent retention period. Records eligible for destruction are destroyed at the earliest opportunity.

Retention and destruction activities are completed consistently, across the Company, regardless of the information's physical or logical format or storage location. When records are destroyed, any copies or versions are destroyed as well. The processes for destroying sensitive information are described in the Information Security Policies and Procedures document.

Information assets that do not rise to the level of business records are retained while they have business value. Once an information asset no longer has business value, it is destroyed appropriately before the maximum retention time prescribed in the RRS.

If there is any question regarding the appropriateness of destruction, contact the ILM Program Head.

VI. Legal Holds

Certain circumstances, such as litigation, internal or government investigations, and audits require preservation and protection of appropriate records and other information assets, often beyond the timeframes specified in the RRS. This process is called a "Legal Hold." Employees should carefully review and be prepared to abide by the Company's Legal Hold Policy in case they are named a custodian of records subject to a Legal Hold.

In the event of a Legal Hold, relevant records and information must not be destroyed and may not be altered or modified until the matter is resolved and the Legal Hold is released. Legal Hold custodians are notified in writing when the legal hold has been released. If you are unsure whether a record or information asset is relevant to a Legal Hold, protect that information until you have checked with the Company Litigation Counsel.

VII. Mergers and Acquisitions

When the Company merges with or acquires another entity, the appropriate measures are taken to integrate recordkeeping and information policies as soon as practical.

VIII. Monitoring and Review



The Company expects full compliance with this policy. The ILM program executes periodic reviews and monitoring activities to support and confirm compliance with this policy.

The Company reviews this Policy to determine whether legal or business requirements warrant its amendment at least every 18 months. The ILM Program Head is authorized to approve amendments to this Policy.

IX. Related Policies

The following Policies and Best Practices are related to the elements contained in this Policy and may be of value to employees charged with its execution.

- a. Information Security Policies and Procedures
- b. Acceptable Use Policy
- c. Records Retention Schedule
- d. Legal Hold Policy
- e. ILM Playbook

Appendix A - Glossary

Business Records are information assets that serve as evidence of transactions, activities, business decisions, etc. and that are managed more formally to ensure their evidentiary weight. Whether something is a business record depends on its content and context, not its physical or logical format or characteristics.

Copy means a duplicate version of a record or other information asset. Copies may be made for convenience or as the result of systems operations. Versions are copies of a record or information asset that have been revised or edited.

Data refers to any symbols or characters that represent raw facts or figures and form the basis of information. Data is sometimes referred to as structured.

Destruction refers to the definitive obliteration of a record or other information asset beyond any possible reconstruction. The means of destruction depends on the format and sensitivity of the information to be destroyed.

Disposition means the final stage of a record or information asset's lifecycle and generally refers to **destruction** of the record or information asset. Records that have historical value to the Company may be retained indefinitely.

Information is data that has been given value through analysis, interpretation, or compilation in a meaningful form. Information assets that need to be managed more formally to serve as evidence of business transactions or decisions are declared as **business records**.

Legal Hold means an instruction issued by the Company Litigation Counsel, or the Company's specifically designated outside lawyers, describing records that, notwithstanding any other provision of this Policy, are to be retained and preserved and not destroyed or altered in the interest of legal compliance.

Records Retention Schedule means a listing of organizational information types, or series of information in a manner which facilitates the understanding and application of the identified and approved retention period, and other information retention aspects.

Retention Period means the period for which a record must be preserved in accordance with this Policy and after which, in the absence of an applicable Legal Hold or other exception, should be destroyed.

Transitory Information refers to information that has short-term business value. It has no enduring legal or operational value; notwithstanding any legal or other holds, transitory information can be destroyed as soon as its business value has lapsed.