



## Record Management and Retention- Italy

Document No.: CF-7-IT-5500  
Revision: C  
Revision Date: 2<sup>nd</sup> March 2018

### **1.0 PURPOSE/SCOPE:**

1.1 Consistent with TI Automotive ("TI Group") legal requirements and sound business practices, it is the policy of TI Group to retain and manage its business, financial, personnel and other Records (as defined below) in accordance with uniform guidelines, practices, and procedures. All TI Group employees or other personnel ("Personnel") shall manage and protect TI Group Records and maintain TI Group Records in accordance with this Records Management and Retention Policy ("Policy") and the Records Retention Chart found at 6.0 below ("Chart").

1.2 It is the intent of this Policy to ensure that all Records necessary for business and compliance reasons will be retained for a period of time that will reasonably assure their availability when needed, but for no period of time longer than reasonably necessary. All Records required to be retained to document TI Group's legal compliance, or otherwise required by law, rule or regulation to be retained, shall be retained for no less than the periods required by law. Compliance with this Policy will also assist TI Group in complying with court rules and orders during litigation, such as the Federal Rules of Civil Procedure and similar rules applicable in state court litigation. All Records required to be retained due to pending or threatened litigation or investigation shall be retained for so long as the litigation or investigation is active. (See Legal Hold section below.) The Chart establishes the Record categories covered by this Policy and the retention period for each category. To the extent that a Record is included in more than one category, the longer retention period shall apply.

1.3 This Policy (together with the Chart) shall apply to all of TI Group's current or future offices and locations. All Records pertaining to TI Group which were created or are maintained by any TI Group Personnel while acting within the course and scope of his or her employment, whether such Records are located on TI Group property or elsewhere, are subject to the requirements of this Policy. The Record retention guidelines of this Policy and the Chart should apply to all applicable Records that may be created, maintained, stored, or otherwise in the possession of TI Group's third party vendors.

### **2.0 RESPONSIBILITIES:**

2.1 Process Owner is Global Director Corporate Quality Systems

2.2 The Legal Department within TI Group is responsible for providing guidance and approving the legal requirements for record retention.

2.3 LEGAL HOLD: The Chart shall be suspended when in the judgment of TI Group's Legal Department or designated outside counsel, a Record or group of Records should be placed on legal hold. A legal hold requires preservation of appropriate Records under special circumstances, such as litigation, government investigations or consent decrees. TI Group's Legal Department determines and identifies what TI Group Records are required to be placed under a legal hold. If TI Group Records are held by outside counsel, TI Group's Legal Department will notify outside counsel.

2.4 TI Group's Legal Department or designated outside counsel shall notify responsible TI Group Personnel if a legal hold is placed on Records for which such Personnel are responsible. Personnel so notified shall then locate and preserve all the applicable Records relevant to the legal hold. If there are questions as to whether a particular document is relevant to a legal hold, Personnel shall protect the document until he or she has checked with TI Group's Legal Department or designated outside counsel. A legal hold remains effective until it is released in writing by a member of TI Group's Legal Department. Once released, the affected Records shall be returned to their prior location and shall thereafter be subject to the handling procedures of this Policy and to the relevant provisions of the Chart.

2.5 Each Department/Area Manager is responsible for ensuring records are retained and stored in their department as described in this procedure.

### **3.0 REFERENCES/RELATED DOCUMENTS:**

- 3.1 Corporate Quality System
- 3.2 Industry Standards
- 3.3 Customer Specific Requirements
- 3.4 Region specific Internal Audit (Corporate) Process
- 3.5 The Global Record Retention Policy (CP-7-ALL-55) applies to all TI Group companies with the exception of those TI Group companies which are located in each of the following countries as such companies shall utilize and comply with the specific Policy related to the country in which it is located:
  - 3.5.1 Australia
  - 3.5.2 Argentina
  - 3.5.3 Belgium
  - 3.5.4 Brazil
  - 3.5.5 Canada
  - 3.5.6 China
  - 3.5.7 Colombia
  - 3.5.8 Czech Republic
  - 3.5.9 France
  - 3.5.10 Germany
  - 3.5.11 Hong Kong
  - 3.5.12 Indonesia
  - 3.5.13 Italy
  - 3.5.14 Japan
  - 3.5.15 Poland
  - 3.5.16 Russia
  - 3.5.17 Slovakia
  - 3.5.18 Spain
  - 3.5.19 Turkey
  - 3.5.20 Venezuela

### **4.0 DEFINITIONS:**

- 4.1 QMS – Quality Management System
- 4.2 QOS – Quality Operating System (Management Review)
- 4.3 Records “Record” means a recording created by TI Group Personnel while acting within the course and scope of his or her employment by any means upon any tangible thing including, but not limited to, computer records, electronic mail (“e-mail”), handwriting, typewriting, printing, photographing, photocopying, or facsimile, of any form of communication or representation, including letters, words, pictures, sounds or symbols or combinations thereof and any record thereby created, regardless of the manner in which the record has been stored.

#### **4.4 STORAGE, ACCESSIBILITY AND RETRIEVAL**

- 4.4.1 **Storage.** TI Group uses multiple offsite storage of paper Records. Records in storage shall be preserved and stored in a secure location. A description of the Records included in a bundle or box shall be prepared prior to storage. All storage boxes shall be clearly labeled with the information necessary for identifying the records they contain. The storage boxes should not exhibit any other labels or markings that may cause confusion. Labels should be positioned so that they are not obscured by other storage boxes. For example, identification labels on storage boxes to be stored

on top of one another should not be placed on the lid or top of the storage box. The records shall be indexed in a manner and method to ensure the stored records can be located and retrieved promptly and efficiently. The storage system shall adequately preserve the Records from deterioration or unintentional destruction, and incorporate appropriate safeguards to ensure the conservation, maintenance and integrity of the Records during their retention periods.

**4.4.2 Confidentiality and Security.** Certain Records of TI Group are confidential, such as non-public financial information, business plans, employee medical and health information, personally identifiable customer information (name, address, telephone number, etc), third party financial information (credit applications, credit card information, etc.), attorney-client communications (all collectively referred to as "Confidential Information"). All employees shall keep Confidential Information strictly confidential and not disclose Confidential Information to any person outside TI Group without written approval of an authorized supervisor or manager. Employees shall disclose Confidential Information to other employees of TI Group only if the employee has a need to know the information. TI Group will employ commercially reasonable measures and safeguards to maintain the security of all Records, including appropriate administrative and technological safeguards with respect to all electronically stored information. Employees shall immediately report any actual, threatened or suspected breaches in confidentiality or security of TI Group's Records to an appropriate supervisor or manager.

**4.4.3 Format.** The format of the Records to be retained may vary, e.g., hard copy original, photocopy, facsimile, microfilm, microfiche, computer file, e-mail, computerized image. Electronic Records should be stored in a format that permits viewing and printing of a legible and complete facsimile of the original Record.

**4.4.4 Electronic Records.** All electronic Records should be maintained in a manner and utilize technology that provides the ability to print a paper copy of the electronic Record. Scanned images of paper Records should utilize technology that creates an exact or near exact facsimile or copy of the paper Record. The technology utilized for storage of electronic Records shall also permit the efficient migration to new formats as technology advances so that electronic Records will continue to be accessible and readable for as long as the Record is required to be retained. In general all records created by word processing, spreadsheet, EDI, or graphic software should be kept the same period of time as if it were a comparable paper record, whether saved to the hard drive or elsewhere. At the end of the retention period, the electronic copy of the record should be deleted or erased.

## **5.0 PROCEDURE:**

5.1 All records are retained for the minimum period required by applicable laws and regulations in the jurisdiction in which the facility is located, or the period required by this Policy or the period required by the TI Group customer, whichever is longer.

5.2 All records related to the production of goods for a customer shall be retained for the life of the production, plus service, plus 1 year, unless otherwise specified by the customer requirements.

5.3 Documents which are not otherwise subject to retention may need to be retained due to unusual circumstances such as pending or threatened litigation, audit or government investigation. If, for any reason, it is felt that a document should be retained due to such a circumstance, TI Group Legal Department must be consulted. When litigation or investigations occur, TI Group Legal Department will notify the appropriate functions or facilities and direct that relevant categories of documents be labeled for retention until further notice.

- 5.4 The privacy and security of records, particularly personnel and related records shall be appropriately assured.
- 5.5 Records maintained on microfilm and microfiche, magnetic tape, CD-ROM or other electronic data processing storage media are legally acceptable media for records retention and will be governed by the same guidelines as other records.
- 5.6 It is imperative that TI Group be able to document which documents have been retained and which documents have been discarded. Therefore, extra files including correspondence, memoranda, notes, computer discs, tapes, etc. which are maintained in individual offices, at home or any other off-site location are subject to this Policy.
- 5.7 It is the intent of this Policy that Records shall be destroyed upon the expiration of the applicable retention period provided in the Chart. Personnel shall carry out the destruction as soon as is reasonably practicable following the expiration of the retention period provided that the Records in question are not subject to a Legal Hold or there is no other good reason (such as the Record having historical value) to retain the Record for a longer period of time. Any Records so retained shall be destroyed when there no longer exists any valid reason for their continued retention. The mode of destruction shall safeguard the confidentiality of the Records and shall render them no longer recognizable as TI Group Records. Destruction methods should be used that ensure the Records, whether paper or electronic, are not capable of being reconstructed. Personnel carrying out the destruction shall maintain a record of the destruction.



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### 6.0 Record Retention Chart:

Record ID	Mandatory Retention Duration (in years)
<b>ACCOUNTING AND FINANCE</b>	
<b>Accounts payable, Accounts Receivables, Audit Reports, Bank Statements, Asset Ledgers Consignment Records and Journals</b>	
Accounts payable, accounts receivables, audit reports, bank statements, asset ledgers consignment records and journals including but not limited to ledger, invoices, expense reports, sales data and journals	10
<b>Budget</b>	
Budgets including forecasts, departmental summaries and annual plans	4
<b>Credit terms</b>	
Applications, approval forms, qualification reports, etc.	10
Collection correspondence	10
Customer history, financial statements, etc.	10
Reports and ratings	10
Letters of credit, guarantees and subordination agreements	Active + 10
Security agreements and financing statements	10
<b>Financial statements</b>	
Published reports	Permanent
Internal	10
<b>Inventory</b>	
Inventory documents including but not limited to scrap reports, LIFO calculations, scheduling documents, reject reports, product information sheets and the like	10
<b>Notes payable and receivable</b>	
	Final payment+10
<b>Payroll records</b>	
Payroll records including but not limited to registers and records	10
<b>Taxes</b>	
Tax returns, Property tax declaration returns, valuation notices and reassessment records	10
Sales tax (blanket exemptions)	Permanent
Audit reports, appeals and hearing documents, Tax authority correspondence and termination reports	Permanent
<b>Retirement and pension plans</b>	
Retirement and pension plans including agreements (including annuity contracts) and amendments	Permanent
Actuarial reports	Current+10
Retired employee files who are members of pension plans	Death of employee+6
Records of pension benefits paid to employees or beneficiaries	Final payment+6
Records of employee service and eligibility for pension (including hours worked and any breaks in service)	Permanent
<b>COMMERCIAL</b>	
Catalogs and price lists	Validity + 10
Contracts (non-production)	Termination+10
Drawings and art work	5
Service reports	5



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Record ID	Mandatory Retention Duration (in years)
<b>Estimating (where TI Group is awarded the business)</b>	
Estimates	Production+Service+1
Price records	Production+Service+1
Specifications	Production+Service+1
<b>Orders and/or Contracts from Customers and Intergroup</b>	
Orders and/or Contracts from customer and intergroup	Production+Service+1
Order and/or contract changes and releases from customer	Production+Service+1
Quotations to customer – accepted customer orders	Production+Service+1
Quotations to customer – no customer order received	2
Warranty and policy adjustments	Production+Service+1
<b>Shipping</b>	
Documents such as returned material and delivery reports, waybills, packing slips etc	5
<b>COMMUNICATIONS</b>	
Communications including public relations materials (eg speeches or literature)	5
News releases and public statements	Permanent
Product literature and survey	10
<b>CORPORATE</b>	
<b>Corporate Records</b>	
Corporate records including corporate registration documents (bylaws and amendments thereto, Certificates of Incorporation, Certificates of Good Standing or similar), minutes, seals, proxies and reports	Permanent
<b>Dividend Records</b>	
Record holder register, Payment orders, Cancelled dividend checks, Unclaimed dividends	Permanent
<b>Legal &amp; Compliance</b>	
Legal and compliance documents including Acquisition/Divestiture agreements and real estate title documents	Permanent
Leases, property licence agreements, mortgages	Active + 15
Options (other than stock)	Excise+3
Real estate documents	Permanent
State registrations/withdrawal authority	Permanent
Recall	Notification+20
Commercial contracts (non-customer contracts) and related documents	Active +6
Settlements	Active+6
Anti-trust investigations or other government or regulatory investigations	20
<b>Intellectual Property</b>	
Patents and patent applications, trademark records and invention forms	Active+2
Royalty payments, patent agreements	Active+6
Laboratory notebooks and Invention notebooks, supporting data and test data	20
Outside submissions of new product ideas	20
Letters pertaining to the patents, copyrights, and licensing agreements	Life of Principal Document in which it Supports
<b>Planning</b>	



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Record ID	Mandatory Retention Duration (in years)
Planning documentation including documents such as business plans, analysis reports and facility studies	Until superseded or 3
<b>CUSTOMS</b>	
Customs-power of attorney	Revocation+5 (or if longer, then as required by local law)
Import records and supporting accounting records	Entry+5 (or if longer, then as required by local law)
Certificate of origin	Entry+5 (or if longer, then as required by local law)
Certificate of manufacture & delivery	Drawback payment+5 (or if longer, then as required by local law)
Shippers export declaration	Export+5 (or if longer, then as required by local law)
Export license application	Export+5 (or if longer, then as required by local law)
Rates and tariffs	5 (or if longer, then as required by local law)
<b>ENGINEERING</b>	
Certifications, Tests and Reports	10
<b>Plant</b>	
Departmental & plant layouts	3
Inventory control	3
Plant inspection and safety audit reports	For so long as TI are in the plant or responsible for the plant
Disposal of plant waste	20
<b>Product</b>	
Drawings, Drawing originals or computer aided design source media, specifications, bills of material and releases	Production+Service+1
Change orders/work orders	Production+Service+1
Engineering deviations	Production+Service+1
Project and lab reports	Production+Service+1
Customer information and drawing analysis	Production+Service+1
Project files	Production+Service+1
Cost proposals	Production+Service+1
Independent research and development technical plan	Production+Service+1
Inspection and test records (including safety related)	Production+Service+1
Maintenance and service manuals (products) and other service publications	Production+Service+1
Model designation sheets	Production+Service+1
Technical service bulletins	Production+Service+1
Service literature shipping order	Production+Service+1
Serial number records (products)	Production+Service+1
Service or Product change notice	Production+Service+1
Notice to customer of parts obsolescence	Expiry of Service+1
NHTSA required testing and self certification documents	Production+Service+1



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Record ID	Mandatory Retention Duration (in years)
<b>Tooling</b>	
Blueprints, design and research data	Production+Service+1
Die records (after die is scrapped)	Production+Service+1
Tracings	Production+Service+1
Estimates	Production+Service+1
Material specifications records	Production+Service+1
Manufacturing process sheets	Production+Service+1
Requests for engineering changes and Engineering change notices	Production+Service+1
Tools and supply tickets	Production+Service+1
Equipment and instrument calibration records	Production+Service+1
Maintenance history of tools	Production+Service+1
Machine manuals	Production+Service+1
Parts lists and spec sheets	Production+Service+1
Tool Inspections (including Safety related tests and inspection reports)	Production+Service+1
Work order requests on machines and Tooling Shop Orders	Production+Service+1
<b>HUMAN RESOURCES</b>	
<b>Personnel Equal Employment Opportunity</b>	
Apprenticeship program data (including criteria for selection for apprenticeship programs; applications, qualification, interview records, test papers, and basis for selection or rejection)	5
<b>Personnel General</b>	
Personnel records, including individual attendance records, application forms, performance evaluations, termination papers, requests for accommodations, transfer records, lay off records, records of promotions or demotions, employment test papers, termination records, policy acknowledgement forms, exit interview records, withholding information, garnishments, certificates of age, training records, individual test results, etc.	Termination+4
Physical examination papers and results	10 years from last entry
Applications, resumes, results of pre-employment physicals and related correspondence for non-hired applicants	2
Individual employment agreements/contracts	Expiration+7
Job advertisements, internal job postings and job orders for recruitment	1
All personnel records relevant to a discrimination charge or lawsuit	Until final disposition
Job descriptions	Active+3
Employee handbooks	Permanent
<b>Industrial Relations</b>	
All related records and any agreements	Permanent
Union negotiation records	Duration of Union Agreement to which it relates
<b>Employee Suggestions Made To Company in Writing</b>	
	5
<b>INSURANCE</b>	
Policies (Workers compensation, product liability, umbrella, property, fidelity and crime, general liability and other third party) and certificates issued to TI Group	Permanent
Certificates issued on behalf of TI Group, Inspection reports	3
Audits or adjustments	Final adjustment+2





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Record ID	Mandatory Retention Duration (in years)
Inspection Reports	3
Annual loss summaries and loss runs	10
<b>Claims files (including correspondence, medical records, injury documentation, etc.)</b>	
Such as Workers compensation claims and product liability claims	Close of claim or final payment+10
Long term disability claims	Close of claim or final payment+10
<b>PRODUCTION</b>	
<b>Product Control</b>	
Request for authorization to scrap (after scrap approval)	Production+Service+1
Production requests	Production+Service+1
<b>Production and Productivity</b>	
Operating reports	Production+Service+1
Production data	Production+Service+1
Production indices	Production+Service+1
Production proposals	Production+Service+1
Production part approval	Production+Service+1
<b>Product Reliability</b>	
Inspection reports	Production+Service+1
Product failure and analysis reports	Production+Service+1
<b>Product Development</b>	
Design records	Production+Service+1
Product design specification	Production+Service+1
Product testing records	Production+Service+1
Product tool design records	Production+Service+1
Research records	Production+Service+1
Technical meeting minutes	Production+Service+1
Testing reports	Production+Service+1
<b>PROPERTY RECORDS</b>	
Such as Appraisals (Valuations), permits, plans and other records	Possession+2
<b>PURCHASING</b>	
Vendor price quotation (for issued purchase orders), Bids, awards	Production+Service+1
Vendor price quotations (no purchase order issued), Bids, rejected	2
Requisitions	Production+Service+1
Purchase orders and contracts	Production+Service+1
Acknowledgements from vendor (after completion of job or contract)	Production+Service+1
Request for bids	Production+Service+1
Transfer purchase order	Production+Service+1
Packing slips from vendor	Production+Service+1
Receiving and inspection report record	Production+Service+1
Production schedules	Production+Service+1
Part releases	Production+Service+1
Authority for sale of scrap	Production+Service+1



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Record ID	Mandatory Retention Duration (in years)
<b>QUALITY</b>	
Reports	Production+Service+1
Gauge control worksheets and charts	Production+Service+1
Vendor certification to TI group / TI group certification to customer	Production+Service+1
Warranty charts and supporting data	Production+Service+1
Quality control reports	Production+Service+1
Material substitution records	Production+Service+1
Supplier quality data	Production+Service+1
Equipment and instrument calibration records	Production+Service+1
Inspection and test records including reports for incoming material	Production+Service+1
Log sheet on receiving inspection	Production+Service+1
Heat treat log book	Production+Service+1
Product certification report (new parts)	Production+Service+1
Supplier certification on rough material	Production+Service+1
Customer service records	Production+Service+1
Returned goods records	Production+Service+1
Consumer and customer complaints	Production+Service+1
<b>SAFETY AND ENVIRONMENTAL DOCUMENTS</b>	
Safety and environmental documents such as records, reports, emergency plans, health and safety bulletins	Longer of 10 or as per local law requirements
Material safety data sheets	Permanent
Accident reports, injury claims, settlements	30
Toxic substance exposure records	Separation+30
Hazardous exposure records	Permanent
Blood-borne pathogen exposure reports	Longer of 30 or as per local law requirements
Training records	10
Asbestos, ionized radiation, radition, vinyl chloride, mechanical power press, industrial slings, carcinogens, ground fault, ethylene oxide - personnel or environmental monitoring, employee medical exams, inspection reports, medical records, personnel rosters, etc.	Permanent
Environmental site files including insurance claims	Permanent
<b>WASTE MANAGEMENT</b>	
<b><i>Hazardous Waste Management</i></b>	
Documents and files related to hazardous waste management including forms, inspection records, reports, contingency plans, minimization plans etc	Longer of 20 or local law requirements
Manifests and land disposal restriction forms	Permanent
Written agreements with State emergency response teams, emergency response contractors, and/or equipment suppliers	Until renewal
Documentation that emergency response, police, fire departments, and/or hospitals refused to make arrangements	Until arrangements are made
Hazardous waste employee records: names; job titles; skill, education and duties; training description; and training attendance records	Termination+20
Contracts for transporter/disposal services	Permanent
Records of analytical laboratory certifications	Permanent
<b><i>Volatile Organic Emissions from Containers, Tanks and Surface Impoundments</i></b>	



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Documentation such as records of VO storage, inspection records and general documents correspondence that describes the storage units for volatile organic liquids	Longer of 10 or as per local law requirements
<b><i>Underground Storage Tanks</i></b>	
Documents related to UST such as reports and other records	Longer of 10 or as per local law requirements
<b><i>Pesticide Management</i></b>	
Government pesticide application permit	Until renewal
Records of pesticide applications, Records of cholinesterase tests for pesticide applicators, Records on structural fumigation projects, General correspondence on pesticide management	Longer of 6 or as per local law requirements
Documents related to pesticide such as list of certified pesticide applicators and other records or reports	Longer of 3 or as per local law requirements

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**7.0 REASON FOR CHANGE TABLE:**

REVISION LETTER	REVISION DATE	DESCRIPTION OF CHANGE	APPROVAL HISTORY
A	16 <sup>th</sup> August 2010	Original Release	T. Guerriero J. Gunter
B	01 <sup>st</sup> March 2012	Changed document number, Removed process champion and approver fields from header and added under responsibilities section 2.0, Added country name in the title block, Removed [Name of TI company] and replaced it with "TI Automotive Ltd" and "TI group" in section 1.1, Added sub-section 3.5 under 3.0 References / Related documents	R. Blackerby K. Withane
B	18 <sup>th</sup> August 2015	Document review for actuality after three years. No document changes required. Revision level stays at B.	Z. Pepper K. Withane
C	2 <sup>nd</sup> March 2018	Updated to align with IATF 16949; including new document number, process owner and references.	Global Director Corporate Quality Systems