SECTION 14:
Records Retention and Corporate Governance Data

A. SUMMARY

B. POLICY

C. OWNERSHIP & APPROVAL

D. DEFINITIONS

E. REFERENCES
A. SUMMARY
Carrier will retain records and data as needed to satisfy business needs and applicable laws and regulations. Carrier will maintain a database of current and historical records of certain corporate governance data as required to support Carrier’s compliance with applicable laws and its policies and procedures.

B. POLICY
1. Records Retention: Retaining necessary records and data is a routine part of business, enabling Carrier to conduct its business effectively and to respond accurately and in a timely manner to internal and external customer demands. However, retaining unnecessary records and data in any form complicates and delays the retrieval of important information and wastes limited resources such as storage capacity and filing space. Reporting Units and Carrier WHQ departments will ensure that records and data are retained, reviewed, stored, and disposed of systematically, as necessary to satisfy business needs and the requirements of applicable laws and regulations. Such retention shall be in accordance with the Records Retention Schedule and Procedures set forth in the CPSW referenced below.

2. Corporate Governance Data: Carrier will maintain a database of current and historical records of certain corporate governance data as required to support Carrier’s compliance with (i) applicable laws and regulations and (ii) its internal requirements, including the CPM and the CPSW. Carrier’s Legal and Finance organizations shall maintain an accessible, single, centralized database serving as Carrier’s primary repository for such records of corporate governance data.

C. OWNERSHIP AND APPROVAL
The CLO is the owner of this policy. All modifications to this policy require prior approval of the CLO or his or her designee.

D. DEFINITIONS
Records and data:

1. Written, recorded, or graphical material of any kind in the possession or control of Carrier, its subsidiaries and divisions, or their directors, officers or employees in the course of their duties; and

2. The term includes data in any medium, such as paper, recordings or electronic files (whether stored on a network server, individual computer hard disk or separate disk from which information can be obtained by any means).
E. REFERENCES
All referenced policies and procedures can be retrieved via ePolicy.

CPSW-14A: Records Retention.
CPSW-14B: Maintenance of Corporate Governance Data.