



RECORDS MANAGEMENT POLICY

Capital Power Records Management Policy		
Approved by:		Date:
	Title of Signatory	

Version #	Description of Changes	Date	Initial

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Schedule:

Records Retention Schedule

Purpose

Capital Power recognizes that Records are its corporate memory, providing evidence of actions and decisions to support Capital Power's daily operations and administration. Properly managed Records enable Capital Power to find the information it requires easily (i.e. what we want, when we want it). The purpose of this Policy is to ensure that Capital Power's Records are systematically and efficiently managed from their creation or receipt until their ultimate destruction, in support of Capital Power's operations and risk management initiatives, and in compliance with applicable legislation. This policy applies to all full-time employees, part-time employees, independent contractors, interns, consultants, suppliers, clients, and other third parties.

Definition

Records are information or data, regardless of physical form or characteristics, made or received in connection with the transaction of Capital Power business. This includes any data generated, distributed or maintained by individuals in the performance of their duties.

Principles

- Records, regardless of format or location, are the property of Capital Power and do not belong to individuals, business units, shared services units, regions, departments or other parties that created and received them.
- Records must be retained, secured, and destroyed in accordance with the Records Retention Schedule and in keeping with the Records Management Procedures.
- Destruction of Capital Power's Records will cease immediately in the event of a Legal Hold.
- Records will be managed in a way that minimizes duplication and optimizes storage.
- Records captured in all media are subject to this policy.
- Non-records, while addressed by this policy, are not subject to the Records Retention Schedule. These non-records are to be destroyed once their useful life has expired.

Accountability

This Policy is applicable to all Records in all Capital Power locations and to all employees and contractors of Capital Power, its subsidiaries and affiliates (collectively, Capital Power).

The Records Manager, under the direction of SVP Legal & External Relations, is the owner of the Records Retention Schedule and the procedures that govern retention and destruction. The Records Manager and department representatives are subject matter experts and provide guidance; however, each employee is responsible to follow this policy and the associated procedures.

Standards

- SharePoint is the application for storage of electronic records, unless another system has been authorized. The use of public drives will be phased out with the implementation of SharePoint sites enabled with retention management.
- Paper and other physical records, regardless of format, are to be held securely and managed in accordance with the Physical Records Procedures.
- Email is a media which may hold a record in either the body or in an attachment. Not all emails need to be retained.
 - Any email that contains a record should be tagged or moved to where retention and appropriate access permissions have been applied.
 - Email pertaining to routine matters and having no significant, lasting consequences, should be deleted when no longer required.
 - All email not tagged in Outlook will be permanently deleted after 1 year.
- Duplication of documents must be minimized.
 - Where possible, links to documents stored are to be sent in emails, not copies of documents themselves.
 - Where there are multiple recipients to an identical email chain, only one copy is to be retained.

Legal Holds

Capital Power personnel will not, or will not knowingly allow others to, destroy, dispose of or alter evidence once a legal proceeding is reasonably foreseeable or a legal hold has been declared. Capital Power personnel will comply with all instructions and directions issued by SERT (Senior Executive Response Team) concerning the preservation of evidence relating to legal proceedings. For additional information please refer to, and adhere to, the Legal Hold Procedure.

Enforcement

Compliance with this Policy will be monitored periodically. Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment or other relationship with Capital Power.