

# Our Records and Documents Management Policy

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*ITP Aero is part of the Rolls-Royce group of companies and is subject to the same standards of behaviour as the rest of Rolls-Royce. ITP Aero has adopted this Policy based on the equivalent Rolls-Royce Group Policy. This Policy is mandatory and applies to all employees and workers of ITP Aero, including the parent company and all its subsidiaries. This Policy sets the minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed.*

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Proprietary Information ITP AERO

# Introduction

Records and documents belonging to ITP Aero are valuable assets and all employees have a responsibility to ensure the records and documentation they come into contact with are managed appropriately.

This Policy is mandatory and applies to all employees of ITP Aero and its subsidiaries (“ITP Aero” or “Company” or “employees”). This Policy sets the minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed. Breaches of the ABC Policies, including this Policy, are not acceptable and may result in disciplinary action up to and including dismissal.

## This Policy:

- provides a framework for our approach to manage records and documents
- sets out our records and documents expectation standard

### Your responsibility

- To recognise the records and documents responsibilities you have in your work area.
- To ask your manager questions regarding the appropriate handling of records and documents if it is unclear to you.

### Your manager’s responsibility

- To understand the records and documents required of you and your employees.
- To support the effective management of records and documents for your area of responsibilities.

# 1 Records and documents management policy

Our records and documents are critical to the effective functioning of the company. We all have a responsibility to manage them appropriately throughout their life-cycle. This Policy applies to all ITP Aero employees who create, transfer, receive, use, retain or dispose of company records or documents.

Across ITP Aero, we will implement appropriate procedures to ensure we meet all internal, legal and regulatory requirements regarding records and documents retention, wherever we conduct business.

## 1.1. What we will do:

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- Help you to implement record and document management systems which allow you to deliver commitments to customers, shareholders and stakeholders; and to comply with legal, regulatory and statutory requirements in countries in which we operate.
- Help you to retain records and documents in accordance with agreed principles and procedures in the businesses and functions where we operate.
- Ensure that you are all are aware of your obligations regarding record and document storage, retention and
  - Retrieval and that, to ensure compliance, there is a clear understanding of those obligations.
  - Listen to your feedback and continually review and improve our procedures to drive pace and simplicity, ensuring that we progress the most effective approach for continued management of records and documents.

Our records and documents are valuable company assets. By working together to effectively manage our records and documents, we will successfully meet our obligations.

## 2 Where to find out more

If you have any questions or need further information, you can contact:

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- The ITP Aero Ethics Line

Available at the intranet [ecm.itpaero.com](http://ecm.itpaero.com) and the website [www.itpaero.com](http://www.itpaero.com)

## 3 Other documents you should read

- The ITP Aero Code of Conduct
- ITP Aero Quality Policy
- ITP Aero Confidential Information Policy
- ITP Aero Policy on Strategic Export Control
- P-0001 Documents and Record Control

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