



**PetroChina
Canada**

Policy

ENTERPRISE INFORMATION MANAGEMENT POLICY

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1. PURPOSE

It is the commitment of PetroChina Canada Ltd. (“PetroChina Canada” or the “Company”) and its Information Management department (IM) to enforce the protection and management of its information assets to ensure retention, accessibility, reliability, integrity and completeness. While it is the directive of IM to manage information assets, it is everyone’s responsibility to uphold the quality and security of each information asset.

All information must only be used for company approved purposes and may not be used for any other purpose or by third-parties without explicit written consent of PetroChina Canada.

This Enterprise Information Management Policy (the “Policy”) establishes PetroChina Canada’s direction and required behaviors with respect to the management and protection of information assets. In keeping with this overall purpose, the specific objectives of the policy are to:

- promote transparent, consistent information management practices;
- support compliance with applicable statutes, regulations and industry standards;
- establish the need to preserve PetroChina Canada’s information assets against loss or destruction when there is reasonable anticipation of litigation or regulatory inquiry;
- promote the management of electronic information in a manner that complies with PetroChina Canada’s information management objectives, ensuring electronic information retains integrity over time and to guard against inappropriate access, loss or destruction;
- protect the reliability, integrity and availability of all information assets as needed to support effective, compliant business activities;
- ensure that information assets are retained and disposed of in a manner which meets applicable legal and business requirements; and
- establish roles and responsibilities with respect to information management.

2. SCOPE

This policy applies to:

- all Personnel (defined as “all full-time and part-time employees, contract workers, contractors and consultants”) of PetroChina Canada. When appropriate, the Policy will be included as part of the contractual agreements with third parties such as customers and suppliers that may access or create Company information assets.
- all information made, captured or received in the course of business activities performed by or on behalf of the PetroChina Canada regardless of the format or medium (e.g. paper, electronic, email, text, tweets, voice, images and video) in which it is recorded and includes both structured and unstructured information; and
- the management of all information regardless of physical format or characteristics.

3. POLICY CONTENT

A. INFORMATION PRINCIPLES

- 1) Information is created, managed, accessed, and retained in one system of record.
- 2) Information assets are easily searchable, correctly versioned, accessible, universal not individual, and accurate.
- 3) Information is available for collaborative activities and access is open by design, closed by exception.
- 4) Information assets are managed throughout the entire lifecycle.
- 5) Information is managed using standard business practices, industry standards, and controls that ensure quality.
- 6) Information is qualified as a core business asset and not owned by individuals.

B. POLICY STATEMENTS

- 1) All information assets created in the course of business, developed for or acquired by the Company are property of the Company and must be managed in accordance with applicable Company standards and used only for Company-approved purposes.
- 2) Information which does not document a business activity, transaction or decision, shall be considered transitory and disposed of as soon as it is no longer required to support business operations, subject to applicable legal holds.
- 3) Email messages are considered information assets and retained and managed accordingly, along with any attachments or metadata that contribute to their structure, context, and content.
- 4) All structured data, managed and maintained in applications or databases, are information assets and shall be retained and managed accordingly.
- 5) The Company shall apply appropriate tools and methods to ensure secure and reliable access to information assets as needed to support authorized business activities. Examples of such methods and tools may include taxonomies, metadata models, naming conventions, and physical filing systems.
- 6) Information assets must be protected from unauthorized or inappropriate access or use. Physical and technical means shall be applied, as appropriate to the value of the information, taking into consideration requirements to preserve the verification, traceability, completeness, confidentiality, availability and integrity of the information.

- 7) Upon receipt of notice of a legal hold, notified Personnel must immediately suspend deletion, overwriting, or any other destruction of any information, electronic or paper, in their custody and control that may be relevant to the legal hold.

C. ROLES & RESPONSIBILITIES

- 1) Information Management shall be responsible for:
 - a) determining the Company's strategic direction with respect to information management;
 - b) developing information management retention schedules policies, standards, procedures and guidelines, or making changes thereto;
 - c) coordinating the communication of this Policy and any related retention schedule standards, procedures and guidelines which may be developed in future to support this Policy throughout the Company;
 - d) identifying legal, business and other requirements related to information management;
 - e) coordinating the development and implementation of future processes and controls necessary to meet information management requirements;
 - f) monitoring compliance with this Policy and related requirements;
 - g) taking appropriate steps to identify and resolve possible challenges to compliance with this Policy;
 - h) ensuring that business information, both project and corporate, is managed, secured, retained, and accessible at all times;
 - i) ensuring that documents no longer required are disposed of securely,
 - j) restricting access to Information to approved parties; and
 - k) facilitating sharing and re-use of business information, which is a valuable collection of knowledge, to the greatest extent possible.
- 2) Senior Leadership shall be responsible for:
 - a) ensuring information assets within their functional area are identified and assigned an Information Owner; and
 - b) supporting and enforcing the IM Policy and any corresponding procedures which may be developed in future within their division.

- 3) Legal Counsel shall be responsible for:
 - a) advising the Information Management department and the Company on legal matters impacting the planning, development, implementation and maintenance of information management processes and controls;
 - b) governing the management and maintenance of a legal holds procedure within the Company.

- 4) Information Systems shall be responsible for:
 - a) ensuring that information technology, systems, processes and services under its supervision are in compliance with this Policy and other applicable standards and procedures;
 - b) providing an appropriate level of leadership and support with respect to the application of information management processes and controls to information systems and technology; and
 - c) identifying technical and other challenges to compliance with this Policy and taking appropriate steps to resolve those challenges in collaboration with Information Management.

- 5) Everyone at PetroChina Canada shall be responsible for:
 - a) understanding and complying with the requirements of this Policy;
 - b) making, capturing and/or retaining information as needed to support Company business activities for which they are responsible;
 - c) identifying and disposing of transitory information as needed
 - d) becoming informed and trained about the Company's Information Management Policy and applying records management processes and controls to information under their custody and control; and
 - e) reporting possible violations of this policy to Information Management or Senior Leadership.

D. COMPLIANCE

Personnel are expected to comply with all aspects of this Policy and to support others in doing so. Personnel who fail to comply with a PetroChina Canada Policy or its intent or who knowingly permit Personnel under his or her supervision to not comply will be subject to disciplinary action up to and including termination of employment, termination of contract or removal from Company's worksite.