



MUBADALA



# Information Management Policy

## Information Management Policy

<b>Policy Number: 5.1</b>		
<b>Version Number: 1</b>	<b>Issue Date:</b> 1 May 2017	<b>Effective Date:</b> 1 May 2018
<b>Authorized by:</b>	Mubadala Investment Company PJSC Ethics & Compliance Office  Name: Shahzad Khan  Title: Head of Ethics & Compliance	
<b>Policy Owner</b>	<b>Ethics &amp; Compliance Office</b>  The Policy Owner is responsible for periodically reviewing and updating this Policy so as to reflect regulatory, best practice and business developments.	

## Applicability & Consequences

This Policy applies to the Mubadala Group and to Mubadala Group Personnel.

Mubadala Group Personnel agree to uphold Mubadala's commitment to do what is right and to follow this Policy and the Mubadala Group Code of Conduct. Mubadala Group Personnel who fail to uphold this commitment put themselves, their colleagues, and the Mubadala Group at risk of fines, penalties, and reputational damage and personally may be subject to disciplinary action, up to and including, loss of employment. The Mubadala Group reserves the right, at its sole discretion, to disclose information about violations of law to relevant authorities. Any Mubadala Group Personnel who have violated applicable laws may be personally liable for penalties or fines or may be subject to imprisonment.

A Mubadala Group Asset may establish standards that are stricter than this Policy. If a Mubadala Group Asset determines that this Policy is too restrictive for effective business operations, it may submit a written request for deviation, including a detailed justification for the deviation, to the Mubadala Ethics & Compliance Office.

## Mubadala Group Personnel Responsibilities

### Mubadala Group Personnel are required to:

- Follow applicable laws and regulations;
- Understand and comply with the requirements of this Policy, the Mubadala Group Code of Conduct, other Group Policies, and any Division/Sector or Asset policies or procedures in relation to this Policy;
- Demonstrate ethics, integrity, and accountability at all times and expect the same from others; and
- Complete assigned training.

### Leadership will:

- Provide appropriate resources and support to ensure the successful implementation of this Policy; and
- Encourage questions, report of concerns and promote corrective actions when needed.

### For Questions & Reporting Violations

Refer in good faith any questions, concerns, or any known or suspected violations of this Policy to your line manager or other internal management or to the Ethics & Compliance Office (see Appendix 1 for contact information).

Retaliation for good-faith reporting is not tolerated. Mubadala Group Personnel who engage in retaliatory conduct are subject to disciplinary action.

## Policy Summary

Effective Information management requires understanding and management of Information throughout its life-cycle. This Policy provides the framework to manage Mubadala Group Information by defining the minimum requirements for each stage of the Information life-cycle to enable the Mubadala Group to understand, manage, and protect its Information at all stages.

This Policy is to be used in conjunction with the Mubadala Group Code of Conduct and any other relevant Mubadala Group or local policies.

Policy Implementation			
Role	Responsibility		
Asset CEO (or equivalent)	Designate an Information Management Owner (IMO)		
Information Management Owner (IMO)	Work with stakeholders to develop and deploy appropriate procedures to satisfy the requirements of this Policy  Provide training on this Policy and procedures  Monitor implementation, compliance, and effectiveness of Information management		
Information Owner and Information User	Support the IMO throughout the implementation  Comply with this Policy and internal procedures		
Information Life-Cycle Responsibilities			
Stage	Information Management Owner	Information Owner	Information User
Identification	Compile and maintain the Information Register	Create list of owned Information and provide it to the IMO	Support the IMO and the Information Owner
	Work with stakeholders to identify Vital Information listed in the Information Register	Keep the list of owned Information up-to-date	

Stage	Information Management Owner	Information Owner	Information User
Creation, Receipt, Categorization, & Marking	Work with stakeholders to define Information creation, categorization, and marking principles	Provide the IMO and Information Users with unique Information creation, categorization, marking, and receipt requirements	Follow Information creation, receipt, categorization, and marking principles
	Work with stakeholders to develop and maintain an Information Category Matrix	Identify the appropriate Information Category for Information	Know the Information Category
	Develop Information marking requirements	Categorize and mark Information as required	When creating Information, categorize and mark it as required
			Seek advice from the Information Owner when receiving unmarked Information
Storage & Security	Specify storage and security requirements for each Information Category	Provide IMO with unique storage and security requirements	Store and protect Information in accordance with the requirements of its Information Category and any unique requirements
Access & Sharing	Specify acceptable access and sharing methods for each Information Category	Specify who may have access to share and receive Information and communicate this to Information Users	Access and share Information in accordance with the requirements of its Information Category and unique requirements
Retention	Work with stakeholders to define the Retention Period for Information on the Information Register	Maintain Information in accordance with its Retention Period or Legal Hold Notice requirements	Retain Information for its appropriate Retention Period or in accordance with a Legal Hold Notice  Return original Information to the Information Owner when no longer needed  Properly hand over Information upon departure from a role

Stage	Information Management Owner	Information Owner	Information User
Disposal	Specify disposal methods and requirements for each Information Category	<p>Inform IMO of unique disposal requirements</p> <p>Dispose of Information in accordance with the requirements of its Information Category and unique requirements</p>	<p>Dispose of duplicate copies of Information in accordance with the requirements of its Information Category and any unique requirements</p> <p>Support disposal of Information at the end of its Retention Period or lifting of Legal Hold Notice</p>

## Definitions

Throughout this Policy, defined terms are capitalized and have the following meanings:

- **Asset:** Any company or business within the Mubadala Group.
- **Division/Sector:** A business or corporate function of Mubadala.
- **Ethics & Compliance Office:** The Mubadala Ethics & Compliance Office or relevant Asset ethics & compliance function.
- **Group Policy(ies):** Any policy that applies to the Mubadala Group. Group Policies do not include policies that only apply to a limited set of Mubadala Group Personnel, for example, a policy that only applies to a specific Division/Sector or Asset within the Mubadala Group.
- **Information:** Data, documents, or records in any format (e.g., electronic, physical), created by or in the possession or control of the Mubadala Group or Mubadala Group Personnel, including third party Information created or stored on behalf of the Mubadala Group.
- **Information Category(ies):** A classification of Information that indicates its level of confidentiality or sensitivity.
- **Information Category Matrix:** A table that specifies Information Categories. Mubadala and each Asset will have its own Matrix.
- **Information Management Owner (IMO):** Individual(s) responsible for establishing and managing the Information management program in Mubadala or the Asset.
- **Information Owner:** The head of the respective function that created the Information or first received Information from a third party; this role may be delegated to an appropriate individual(s).
- **Information Register:** A table that lists Information and associated characteristics such as the Information Owner, its storage medium, and its Information Category.
- **Information Users:** Mubadala Group Personnel who create, access, use, or handle Information to perform their assigned duties. For example, Information Users may be employees, contingent workers, contractors or third parties such as business partners, consultants, customers or suppliers specifically authorized to access Mubadala Group Information or systems.
- **Leadership:** The Chief Executive Officer or equivalent of the Mubadala Group, a Mubadala Sector or Division head, or, in each case, a nominated representative.
- **Legal Hold Notice:** An instruction issued by Legal Counsel to relevant Information Owners and Information Users requiring the retention of specified Information that may be required to respond to existing or foreseeable litigation, investigation, or audit. Only Legal Counsel may remove a Legal Hold.
- **Mubadala Group:** Mubadala Investment Company PJSC (Mubadala); any entity, operation, or investment controlled by Mubadala; and/or any entity, operation, or investment that adopts the Mubadala Group Code of Conduct.
- **Mubadala Group Personnel:** All individuals who work directly for or represent the Mubadala Group, including directors, employees, consultants, and long-term contractors of the Mubadala Group.

- **Retention Period:** The period of time during which Information must be kept to comply with applicable laws, regulations, contracts, and business requirements.
- **Retention Schedule(s):** A list of Retention Periods for Information.
- **Vital Information:** Mubadala or Asset Information that is critical for business continuity and requires specific handling measures, which include storage in locations that provide the ability to restore Vital Information if a crisis occurs.

## Policy Requirements

### 1. Policy Implementation

To satisfy the Information management requirements throughout the life-cycle of Information, Mubadala and each Asset must designate an Information Management Owner to:

- Ensure that the requirements of this Policy are established and implemented;
- Develop and deploy appropriate procedures and processes to ensure that the requirements of this Policy are met;
- Provide training on this Policy and all related internal policies and procedures to Mubadala Group Personnel; and
- Monitor implementation, compliance, and effectiveness of Information management in the Asset.

Information Owners and Information Users are required to support the Information Management Owner.

### 2. Information Lifecycle

Information management within the Mubadala Group requires different stakeholders to comply with requirements based on their roles. Those requirements follow the Information lifecycle below:

- **Identification of Information residing in Mubadala/Asset:** The first step is to understand what Information resides in Mubadala/Asset, which is done by creating an Information Register. This Information Register must be kept up-to-date and is a key reference document in the Information management program.
- **Creation/Receipt of Information:** This is the beginning of the Information lifecycle and occurs when Information is either created internally or received from outside Mubadala/Asset. Creation or receipt brings Information under the Mubadala Group's custody and/or control.
- **Categorization and Marking of Information:** To define and communicate the handling requirements applicable to Information based on its level of sensitivity, Information must be assigned an appropriate Information Category, and Information must be appropriately marked with its Category.
- **Storage and Security:** Each Information Category identifies specific storage, security practices, and requirements that apply to the Information.
- **Sharing:** To protect Information from unauthorized disclosure, each Category defines specific access and sharing rules. Access to Information should only be granted according to its Category and instructions defined by the Information Owner.
- **Retention:** Regulatory, legal, contractual, and operational requirements define for how long Information must be kept. A Retention Period is defined and is listed in the Information Register for each Information type. The Retention Period may also be published in a Retention Schedule.



- **Legal Hold:** In cases where Mubadala/Asset is subject to a potential or ongoing claim, investigation, or audit, Information may need to be retained regardless of its Retention Period. Information subject to a Legal Hold will be identified by Mubadala/Asset's Legal Counsel in a Legal Hold Notice. Only Legal Counsel may issue AND remove a Legal Hold Notice.
- **Information handover:** When Mubadala Group Personnel leave a role for any reason (e.g., changing roles, changing departments, leaving the company), Information must be handed over appropriately.
- **Disposal:** When the Information's lifecycle reaches an end, and only after satisfying specific conditions, it must be destroyed in the manner that is specified by its Information Category.

### 3. Information Management Owner (IMO) requirements

The IMO plays a key role in the implementation of this Policy and the ongoing management of Mubadala/Asset's Information management program throughout the Information lifecycle.

#### a. Identification of Information residing in Mubadala/Asset

The IMO must work with Information Owners to compile and maintain an Information Register. The Information Register must include details related to Information, such as type, owner, storage medium, Category, Retention Period, and whether it is Vital Information.

The Information Register must be detailed enough for Information Users and Information Owners to carry out day-to-day Information management practices.

The IMO must work with Information Owners to identify Vital Information on the Information Register and ensure that appropriate stakeholders are aware of the list of Vital Information.

#### b. Creation/Receipt of Information

The IMO must work with internal stakeholders (such as Communications) to define and communicate Information creation guidelines within Mubadala/Asset.

The IMO must also specify guidelines on proper receipt of Information, which requires the Information User to obtain, where possible, the Category and the Retention Period of the Information being received.

#### c. Categorization and Marking of Information

The IMO must develop an Information Category Matrix, working closely with relevant stakeholders - especially appropriate Legal Counsel - to ensure that relevant regulatory, legal, contractual, national security, and business needs are taken into consideration. The Information Category Matrix not only must be practical but also reflect the sensitivity of Information and the degree of damage that would result from unauthorized disclosure.

The IMO must also develop appropriate marking requirements for Information, regardless of its medium.

#### d. Storage and Security

The IMO must specify storage and security methods and requirements for each Information Category on Mubadala/Asset's Information Category Matrix. The requirements must take into consideration applicable regulatory, legal, contractual, national security, and business requirements.

The IMO must ensure that unique storage and security requirements for Information are listed in the Information Register.

The IMO must also coordinate with relevant stakeholders to provide adequate means to store and protect Information.

#### e. Access and Sharing

The IMO must specify access and sharing methods and requirements for each Information Category. The requirements must take into consideration applicable regulatory, legal, contractual, national security, and business requirements.

The IMO must ensure that unique access and sharing requirements for a specific type of Information are listed on the Information Register.

The IMO must also coordinate with the relevant stakeholders to provide resources to satisfy access and sharing requirements.

#### f. Retention

The IMO must work with Mubadala/Asset's Legal Counsel, Information Owners, and other relevant stakeholders to define Retention Periods.

The IMO should review Retention Periods annually to align with changes in legal, regulatory, contractual, and business requirements.

#### g. Handover

Human Capital in Mubadala/Asset will require an appropriate handover of Information when Mubadala Group Personnel leave a role, which will include certification by the direct supervisor that an appropriate handover occurred. Human Capital also will request written authorization from Mubadala Group Personnel to access secured business-related data that may be needed after the person's departure.

#### h. Disposal

The IMO must specify disposal methods and requirements for each Information Category on Mubadala/Asset's Information Category Matrix. Disposal requirements must take into consideration applicable regulatory, legal, contractual, national security, and business requirements.

The IMO must ensure that unique disposal requirements for a specific type of Information are listed next to that Information on the Information Register.

The IMO must coordinate with the relevant stakeholders to provide resources to satisfy disposal requirements.

## 4. Information Owner requirements

Information Owners are responsible for how Information is managed as follows:

### a. Identification of Information residing with Mubadala/Asset

The Information Owner must provide the IMO with an up-to-date list of Information.

The Information Owner must work with the IMO to identify Vital Information listed on the Information Register.

### b. Creation/Receipt of Information

The Information Owner must provide the IMO with unique Information creation or receipt requirements applicable to particular Information.

### c. Categorization and Marking of Information

The Information Owner must review the Information Category Matrix and identify the appropriate Information Category for Information she/he owns and keep the Information Register up-to-date.

The Information Owner must provide the IMO with unique marking requirements applicable to particular Information.

The Information Owner must ensure that Information is marked appropriately.

### d. Storage and Security

The Information Owner must inform the IMO of unique storage and security requirements applicable to particular Information.

### e. Access and Sharing

The Information Owner must specify who may have access to or receive Information and communicate this to Information Users.

The Information Owner must inform the IMO of unique access and sharing requirements applicable to particular Information.

### f. Retention

The Information Owner is responsible for maintaining Information she/he owns in accordance with the applicable Retention Period.

The Information Owner must preserve Information subject to a Legal Hold in the manner specified in the Legal Hold Notice.

### g. Disposal:

The Information Owner is responsible for informing the IMO of unique disposal requirements applicable to particular Information.

The Information Owner must ensure that Information is disposed of according to the following criteria:

- Information is owned by the Information Owner;

- Retention Period specified for the Information has passed;
- No Legal Hold Notice has been issued for the Information; and
- Disposal is done in accordance with the requirements of the Information Category and any unique requirements assigned for particular Information.

## 5. Information User requirements

Information Users handle Information in Mubadala/Assets on a daily basis and must understand and comply with the following requirements:

### a. Creation/Receipt of Information

The Information User must understand and follow Information creation guidelines.

The Information User must obtain the Information Category for Information received.

### b. Categorization and Marking of Information

The Information User must know the Information Category.

The Information User must mark Information as per the Information Category assigned by the Information Owner and listed on the Information Register.

The Information User must seek guidance from the Information Owner when in doubt.

### c. Storage and Security

The Information User must store and protect Information according to the requirements of its Category and any unique requirements assigned for specific Information.

### d. Access and Sharing

The Information User must access or share Information according to the requirements of its Information Category and only share with those authorized to receive it.

The Information User must seek guidance from the Information Owner when in doubt.

### e. Retention

The Information User must ensure that original Information is returned to the Information Owner, when no longer needed.

The Information User must not keep unnecessary copies of Information.

The Information User must preserve Information subject to a Legal Hold in the manner specified in the Legal Hold Notice.

The Information User leaving his/her role is responsible for ensuring that Information is handed over appropriately.

### f. Disposal

The Information User is responsible for disposing of Information according to the requirements of its Information Category and any unique requirements assigned for specific Information.

## Appendix 1

### Ethics & Compliance Contact Information

**Global number (Mubadala head office, Abu Dhabi):** +971 2 413 3333

**Toll-free numbers are available for the following countries:**

United Arab Emirates 800 413 3333  
 Outside UAE (listed below): 800 2 444 3333\*

Australia	France	Malaysia	South Korea
Austria	Germany	New Zealand	Switzerland
Argentina	Hong Kong	Norway	Taiwan
Belgium	Italy	Philippines	Thailand
Canada	Japan	Singapore	UK
China	Macau	South Africa	USA

\*This toll-free number is only available from the countries listed above. Before dialing the number, you will need to dial your country's international dialing code (e.g., 011 for USA, 00 for UK, etc.) OR dial "+" on your mobile phone.

Facsimile: +971 2 413 5059  
 E-mail: [ethics@mubadala.ae](mailto:ethics@mubadala.ae)  
 Website: [www.mubadalacompliance.ae](http://www.mubadalacompliance.ae)  
 Post: Mubadala Investment Company PJSC  
 Ethics & Compliance Office  
 PO Box 45005  
 Abu Dhabi, UAE