



CODE OF CONDUCT



# MÉRIEUX NUTRISCIENCES

## COMPLIANCE POLICY

### RECORDS RETENTION

(May 2022 – V.2)

#### 1. OBJECTIVES

The Company's commitment to integrity is bolstered by the proper creation, maintenance, and disposal of accurate business records (i.e. Quality records, Testing records, Commercial records, Accounting records, HR records, Corporate records...).

**These records are valuable assets and should be carefully managed and protected.**

The purpose of this **Data Retention Policy** together with its **Schedules dedicated to each Company's country** is to assist the Company in complying with its retention obligations by defining the time period for which business records shall be retained and destroyed, ensuring business continuity, reducing legal exposure (in particular to privacy regulation), and the costs associated with retaining and producing records.

As of today, Records Retention Schedules are available for the following countries/regions:

- [Brazil](#),
- [Canada](#),
- [Europe](#),
- [United States](#),
- [Latin America](#).

This Policy applies to all employees, consultants, directors and officers of the Company. It is the responsibility of managers to share these guidelines and recommendations with them.

#### 2. GUIDELINES FOR THE PROPER USE OF THE RECORDS RETENTION SCHEDULE

This Policy governs the retention and destruction of all records regardless of format, media, location, workplace venue, computer network systems and communications devices, including but not limited to: portable or handheld computing devices, wireless technologies, external hard drives, USB drives, and removable portable storage media.

- **Retention Period**

**The “Retention Period” column specifies the maximum time period that a record must be retained once the purpose of its processing has been achieved.**

**Then, the record shall be deleted or anonymized.**

The Retention Period starts running from the date indicated in the "From" column, no matter if it is an original record or a digital copy.

- **Record Owner**

The "Record Owner" column specifies the department responsible for the record.

During the Retention Period, records shall be accessible only to Record Owner.

If a record is held by a department other than the Record owner, the original record should be sent to the Record Owner and duplicates should be deleted.

- **Original or electronic record?**

The substance or content of the record will determine the record type and applicable retention period.

Electronic records such as emails, voicemail, faxes, instant messages, and text messages, are considered record formats rather than record types.

If the original record is in paper format and was sent to you by mail or delivered by hand, it is advisable to keep the original record. Otherwise, a digital copy of the record is sufficient.

- **Non-listed record**

If a certain record is not listed in the Records Retention Schedule, please contact the Legal Affairs & Compliance Department to determine the duration of its retention.

- **Records Retention Schedules updates**

Please note that regulations may change and the Legal Affairs & Compliance Department will monitor them on a regular basis to proceed with any update needed.

**To ensure access to the most up-to-date version of the Records Retention Schedule, make sure to always use the Google Drive link (see [MXNS Connect - Compliance page](#)) when consulting the Records Retention Schedule and not to upload it on your computer.**

### **3. RETENTION OF RECORDS EXCEPTIONS**

- **Existing or foreseeable legal claim**

In case of existing or foreseeable legal claim, litigation, regulatory audit, governmental inquiry or investigation, or similar action or proceeding, all impacted records shall not be destroyed until the existing or foreseeable legal claim has been handled.

Impacted records shall be accessible only to individuals on a need-to-know basis. Their destruction shall be discussed with the Legal Affairs & Compliance Department.

- **Contractual Obligation**

If the Company has entered into an agreement to extend the statute of limitations or the retention period for certain records, then the periods set forth in the Retention Schedule must be extended for the same amount of time as the contractual extension.

Any contractual extension of a retention period must be approved by the Legal Affairs & Compliance Department.

#### **4. SANCTION STATEMENT**

Failure to comply with the requirements of this Policy or its procedures will result in disciplinary action up to and including termination of employment.

#### **5. RAISING QUESTIONS OR REPORTING IDENTIFIED RISKS**

This Policy does not address every situation you may encounter at work. If there is a situation that you think may pose a risk, violate any local regulation and you are unsure about how to handle it, you should seek guidance. Support is available to you from your manager and/or from the Legal Affairs & Compliance Department and Compliance Department.

You may contact the Legal Affairs & Compliance Department & Compliance Department by email at [compliance@mxns.com](mailto:compliance@mxns.com). Your questions or concerns will remain confidential to fullest possible extent and will receive quick and appropriate follow-up.

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