

Information Management Policy

1. Compliance with relevant legislation and regulatory standards

Businesses¹ shall comply with requirements within legislative and regulatory standards to create and retain records. This includes legislation and standards which affects:

- records creation and formats;
- records as evidence;
- records retention;
- records destruction;
- custody of records;
- control over access and accessibility; and
- copyright.

Businesses are also required to create and retain records relating to critical business processes in a manner which enables the information to be usefully reapplied to support both Corporate and Business objectives.

2. Ability to retrieve information in a timely manner

Businesses shall ensure that information identified as business critical is retrievable in a timely manner.

3. Confidentiality and security of records

Businesses shall provide appropriate measures and resources to ensure the confidentiality, integrity and security of information. This means that records shall be stored, distributed, used and destroyed in a secure environment. Records must be regularly reviewed for sensitivity and business value.

Records are to be classified and protected according to the harm to the business and/or DuluxGroup that would result from disclosure or loss. Where facilities are shared with owners of other information, the security methods used will be those appropriate for the most sensitive information handled by the facility.

4. Requirements for employees, contract staff and suppliers

Businesses shall require all employees, contract staff and Third Party suppliers to exercise personal responsibility for protecting information that they use and shall provide the knowledge and tools to enable them to do so. When collaborating with external parties (eg. Consultants) it is recommended that appropriate information handling procedures are put in place at the initiation of the contract.

5. Destruction

Records must be destroyed using a destruction method which is appropriate to the medium and to the level of confidentiality associated with the record; eg. for

¹ Businesses includes legal entities, strategic business units, individual Businesses, DuluxGroup as a whole and the functional streams.

confidential records on paper or microfilm, the approved method of destruction is "security shredding".

6. Retention

Businesses shall understand and comply with relevant laws and regulations relating to the retention of records. This includes identifying and applying appropriate retention periods for records and ensuring that records are migrated between record keeping systems in an accessible form for the agreed retention periods. Records must be readable (viewable) on the same or comparable hardware and software, as well as other information related to the AGM.