

# INFORMATION MANAGEMENT POLICY



## I. PURPOSE OF THE POLICY

Pembina Pipeline Corporation (the "Corporation") and all entities controlled by the Corporation (collectively "Pembina") are committed to managing information responsibly and in accordance with applicable laws and regulations in order to run the business effectively and efficiently. Pembina recognizes that its Information is an asset in the same manner as a pipeline or gas plant. Subject to any applicable confidentiality obligations, any Information initiated, created or captured during the course of business are the property of Pembina.

The purpose of this Policy is to establish the principles of Information management and outline the respective accountabilities for all officers and all employees, consultants, contractors and agents (collectively, "Users") when handling Information.

## II. SCOPE OF THE POLICY

This Policy applies to all individuals who have access to Pembina's Information. Information governed by this policy includes, subject to any applicable confidentiality obligations, Information initiated, created, or captured that demonstrates evidence of Pembina's business activities. This Policy and the guidelines set forth pursuant to this Policy are intended to supplement, not replace, all existing laws, regulations, agreements, and contracts that currently apply to Information initiated, created or captured during the course of business.

## III. DEFINITIONS

**Disposition** means the destruction of Records in a manner that prevents their reconstruction.

**Enterprise Content Management (ECM)** means the Pembina department formed to facilitate the objectives of this policy.

**Imaging** means the conversion of paper Records into digital Records in accordance with Pembina's standards that manage the conversion and ensure adequate quality to satisfy evidentiary requirements.

**Information or Records** means, as the context requires, documents in any form (e.g. paper, digital, and audio-visual media) or data that is created, received, recorded and maintained by Pembina as evidence of business activity.

**Information Owners** means those departments, functions or roles in Pembina identified in the Records Retention Manual as owning the Information Type or Record Type (as defined in the Records Retention Manual).

**Information Management Solution** means a systematized method to managing Information, including in FileNet, SharePoint, or any other document or data system.

**Records Inventory** means a categorization of Pembina's activities for the purposes of tracking accountability, storage location, security considerations and opportunity prioritization.

**Records Management System** means a software system that can manage the complete lifecycle of a record, including scheduled Disposition.

**Records Retention Manual** means Pembina's Records Retention Manual published and maintained by the ECM department and updated annually, which governs the creation, archival, classification and Disposition of all Pembina Records and contains the list of Information Owners and the Records Retention Schedule.

**Records Retention Schedule** means a categorization of Pembina's activities for the purposes of prescribing the retention duration and format for Records.

## IV. PRINCIPLES

### A. Regulatory and Legal Obligations

Pembina's management of Information must meet or exceed applicable legal and regulatory obligations. With respect to Pembina's various regulatory and legal obligations:

#### Personal Information

Personal information collected through course of business activity (User Information, third party Information or otherwise) must be protected, maintained and disposed of in accordance with Pembina's Privacy Policy, applicable laws and regulations.

#### Legal Holds

Pembina may place Disposition practices on hold for certain legal, regulatory, taxation, or joint venture review. With respect to legal holds:

- A systematic procedure for legal holds is established and enforced throughout Pembina's business operations and is executed in accordance with Pembina's Records Retention Standard.
- Pembina's Vice President, Legal and General Counsel or Legal department delegate, and the Chief Financial Officer are the only individuals with the authority to issue or release an order for legal hold.
- It is Pembina's policy to release legal holds as soon as the matter has been completed or the requirements of the circumstances have been met.

#### Records Retention and Disposition

Pembina retains Information for a duration that meets applicable legal and regulatory obligations. With respect to Records retention and Disposition:

- Information will be retained by the designated Information Owner in accordance with the Records Retention Manual which is updated annually by the ECM department. The Records Retention Manual has been created with reference to applicable laws, regulations, standards, and licenses.
- Information will be identified under the Records Retention Manual. Information Owners are accountable to inform the ECM department of any changes in the scope of business activities, Information storage location, or regulatory, standard, or licensing requirements to their area of business.
- Disposition of Pembina's Information will follow the process outlined within the Records Retention Manual. The Disposition of Records shall not occur without first obtaining all required approvals in accordance with the Records Retention Manual. The Information Owners need to confirm in writing that ECM has permission to dispose of the

Information. The ECM department is solely responsible for both initiating the Disposition of Pembina's Information and confirming that it has been successfully disposed of.

## **B. Quality**

The quality of Information is the responsibility of the Information Owners. With respect to the quality of Information:

- Senior Managers and Managers identified as Information Owners are accountable for the quality of Information related to their functions, including allocating the necessary resources to manage and maintain information in accordance with:
  - corporate standards and guidelines;
  - technical requirements as required to meet Pembina's legal and regulatory obligations; and
  - to satisfy their business needs.
- Each Business Unit is responsible to ensure existing personnel are current on this Policy and the Records Retention Manual and that all new personnel are educated with respect to this Policy.
- ECM develops and monitors Key Performance Indicators (KPI) for Information Management Solutions for the purposes of quality monitoring. These KPI are reviewed at least annually with Information Owners who are then responsible for resolving any variations in KPI.

## **C. Efficiency**

Adherence to this Policy creates efficiency by optimizing the overall costs of managing information assets. With respect to the management of Information:

- The ECM department will prioritize Information assets based on the significance of risk or opportunity to the organization.
- Document Imaging will be conducted in accordance with Pembina's standards contained in the Records Retention Manual.
- Pembina's goal is to manage only one version of any document with preference given to digital documents. Exceptions will exist where regulations or legal considerations require the need for the retention of paper documents as set forth in the Records Retention Manual.
- The purpose of a system backup is to provide a means to restore the integrity of a computer system in the event of a hardware/software failure or physical disaster. System backups are not intended to serve as an archival copy or to meet records retention requirements.
- All storage, retrieval, and Disposition of corporate records, whether in the normal course of business or within a legal discovery process, shall occur within the Records Management System only. IT Systems backup processes shall be excluded from any such expectations.
- The ECM function shall be informed of acquisition and divestiture activities prior to closing of the applicable transaction to provide ECM the opportunity to identify potential impacts on Pembina's Information.

## D. Accessibility

Pembina has access to the right information at the right time. With respect to the accessibility of Information:

- Users will add Applicable Information to Information Management Solutions within those timelines outlined in the Records Retention Manual.
- Users will not store Information in non-network accessible locations (e.g., locally on a device or hard drive).
- Users will request access to required Information Management Solutions or repositories.
- Information Management Solutions will be designed to segregate User roles and authorities, allowing view-only rights as openly as possible.
- Information Owners will authorize or deny requested access to Information Management Solutions or other repositories.

## E. Security

Pembina's Information is a corporate asset and it needs to be appropriately protected. With respect to the security of Information:

- Pembina's Information is classified into three levels: Company Information, Restricted Information and Personal Information (as such terms are defined in the Records Retention Manual). Provisions for the appropriate restriction of access are contained in the Records Retention Manual.
- Information Management Solutions are designed to segregate User roles and authorities, allowing rights to modify Information to only those who require it. This is to ensure the integrity, authenticity and reliability of Information.
- Users will adhere to Pembina's IT Acceptable Use Policy.

# V. GOVERNANCE

ECM develops and monitors KPI for Information Management Solutions, which KPI are reviewed at least annually with Information Owners. Information Owners are responsible for resolving any variations in KPI.

# VI. CONSEQUENCES OF NON-COMPLIANCE

Compliance with this Policy is a condition of your employment or contract. Any inappropriate use of, or intentionally risking the integrity of Pembina's Information by Users may result in severe consequences, which could include internal disciplinary action up to and including dismissal for cause or termination of contract.

This Policy was last approved by the Board of Directors on **February 25, 2016**.