

Dept: Group Legal Owner: Group Legal	Version number: 2.0	Effective from: 13.06.25
Created by: Helen Botting Creation date: 25 th April 2024	Reviewed by: Chris Lewis / Henry Knowles Revision date: 13.06.25	Issue date: 23.09.25

Policy Name **DOCUMENT RETENTION AND DESTRUCTION POLICY**

This Policy must not be amended without the approval of the General Counsel of Vesuvius plc

Purpose

The purpose of this policy is to ensure a consistent approach across all Vesuvius sites/entities for document retention and destruction and ensure compliance with legal obligations. In this way, document retention costs will be minimised, legal obligations complied with and improvements to operational efficiency can be realised through the longer-term retention of only necessary documents.

Definitions

Document	A Document is anything in which information of any description is recorded for Vesuvius business needs, such as: <ul style="list-style-type: none"> • paper records • electronic records on servers, laptops, databases and stored in the cloud in file format • messages (and attachments) on email, mobile devices, social media, Microsoft Teams and other communication services • calendar information • audio, video and digital information • records/entries in third party systems accessed by employees and consultants • records held in plants, offices and home locations, potentially also at customer locations • any of the above held as deleted/backed up items
Document Owner	The Document Owner is the most senior person at a site in that function or business line – e.g. for HR matters, it would be the most senior HR person at the site.
Disposable Document	A document created with a view of immediate disposal/not to be stored on Vesuvius systems, such as: <ul style="list-style-type: none"> • unannotated duplicates of originals (unless scans or copies produced as part of a Document Retention Policy or other Management Policy); • preliminary drafts of letters, memoranda and other documents (unless they are significant for any reason in relation to the final Document); • books, periodicals and other printed materials obtained from sources outside the Company; and • junk/spam mail and other unsolicited email.
Master Retention Schedule	The retention schedule set out at Appendix A along with country derogations in Appendix B

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Policy

- **Ownership:** Compliance with this Policy is the responsibility of the Document Owner.
- **Master Retention Schedule:** Documents identified in the Master Retention Schedule (see Appendix A) are required to be retained as set out in that schedule.
- **General business Documents:** Documents which are not identified in the Master Retention Schedule, shall have a retention period of six years, unless applicable local legislation requires a longer period.
- **Storage:** Documents must be stored in a way that they can be searched and retrieved as necessary, in order to ensure that they are retained and destroyed in accordance with this Policy.
- **Destruction:** Documents should be reviewed on an annual basis. If they have been stored for longer than the relevant retention period, the Document Owner should assess whether there is a business requirement to retain the Document. If it is confirmed that such Documents are no longer required in line with this Policy, these should be confidentially destroyed.
- **Local Variations:** Each Vesuvius site must review this Document Retention and Destruction Policy and Country Derogations in Appendix B and, if necessary, create an addendum to this Policy to ensure that where retention obligations are longer in duration than set out in this policy, applicable national statutory retention periods are properly applied at that site. Where minimum data retention and destruction periods required by national law are less strict than those indicated in this Policy, the requirements in this Policy must be applied. Any addendum created to this Policy to adapt to different national statutory retention periods must be reviewed and approved by the General Counsel of Vesuvius plc prior to its adoption.
- **Litigation and Investigations:** This Policy's retention period may be extended in respect of Documents that are required in connection with any ongoing civil or criminal litigation, any investigation or regulatory proceeding or potential future litigation. Employees will be specifically informed of this requirement if it arises (a "**Litigation Hold**"). Documents the subject of a Litigation Hold must not be destroyed until after any possible appeals or associated actions have been ruled out or if required in archive for potential future litigations.
- **Data Protection:** Documents that are the subject of pending or ongoing subject access requests under data protection legislation are required to be retained until otherwise directed by the Group Data Protection Officer. Employees will be specifically informed of this requirement if it arises.

This Policy should be read together with the Master Retention Schedule in Appendix A.

Procedure

1. On implementation of this Policy:

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- a. Each Site Responsible Person must review Appendix B and establish a local version of the Policy.
- b. Each Document Owner must review all documentation held by their department in line with the Policy (including all electronic and physical storage locations).
- c. Once the review is completed, all Documents which have been retained for longer than the applicable retention period and which are not required to be kept should be deleted or destroyed confidentially. Deletion or destruction of Documents must be approved by the Document Owner in advance.

2. On an ongoing basis:

- a. Documents must be filed and stored, with adequate levels of confidentiality, in an organised manner such that they can be easily found, reviewed and retained/destroyed in accordance with this Policy.
- b. An annual review of retained Documents must be conducted. All Documents which have been retained for longer than the applicable retention period should be reviewed to confirm if there is a business requirement to retain them further or if there is a Litigation Hold in place. All such Documents which have been identified as not necessary to retain should be deleted or destroyed confidentially. Deletion or destruction of Documents must be approved by the Document Owner in advance of destruction.
- c. Retained Documents can be archived as necessary, but archived Documents must also be subject to annual review for application of the Policy. Any Documents which are archived must be done so on a basis which means they can be easily found and retrieved if necessary.
- d. Each Document Owner must review their own Document storage, retention and destruction procedures on an annual basis and satisfy themselves that their department is complying with the Policy.

Guidance and Best Practice

Carry out an inventory of the documentation held by your department. This should include all physical and electronic storage locations (e.g. shared drives, Outlook, Teams, SharePoint etc). For some departments (e.g. HR) the annual data protection audit may be a useful method of doing this.

Ensure that documentation is held in an organised and structured manner, so that you are easily able to locate Documents of a particular type that are subject to this Policy - e.g. employment records should be held in a known location, structured by employee, with a clear and visible date of departure against the employee folder for employees who have left the business. Documents should have a document creation date in the file name, preferably as the first characters of the file name in year/month/day format to enable quick sorting by date.

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If you retain emails for your records, either store them in a shared drive or SharePoint site, or store them in a folder structure in Outlook so you can more easily find them.

When a Document has exceeded its retention period, the default should be to destroy the Document unless there is a business requirement for retaining it – i.e. is the Document necessary for business operations, and/or will business decisions require this Document.

Retaining Documents “just in case” is not an adequate justification for retaining them beyond the retention period. By way of example, for employee files there would be no need to retain pay, holiday or disciplinary records beyond the retention period. However, there would be a business justification for retaining employees’ name, start and end date, position(s) and location(s) in case there is a future claim in relation to e.g. vibration white finger for employees at that site. This would enable Vesuvius to confirm that the claimant worked there in a relevant capacity.

Where hard copy Documents exist:

- consider if it is appropriate to scan the hard copy Document so that it can be saved electronically and the original hard copy can be destroyed confidentially; and
- if a hard copy is required, ensure that it is filed and stored in a way that ensures it can be found, reviewed and destroyed in accordance with this Policy.

Keep a record of Documents that have been sent to archive, so that they can be recovered in future if individuals move on from the Company. This should include the following information;

- name of the individual responsible for the Documents;
- brief description of the Documents/files and where archived the unique archive box reference; and
- the date the Documents are sent to archive.

APPENDIX A - MASTER RETENTION SCHEDULE

Record	Retention period
Company secretarial records	
Incorporation documents - Certificate of incorporation, change of name, Memorandum and Articles of Association and Resolutions	Permanently
Notices, circulars, minutes, decisions and resolutions and other associated correspondence	20 years
Proxy forms/polling cards - no poll demanded - poll demanded meeting	1 month after meeting
Proxy forms used at meetings convened by court	At direction of court or 1 year after court supervision
Statutory returns, records and registers	Permanently
Dividend and interest payment lists	6 years
Paid dividend and interest warrants	6 years after date of payment
Dividend and interest mandates	6 years after ceasing to be valid
Cancelled share/stock certificates	1 year from the date of registration of transfer
Notification of change of address	2 years
All other documentation regarding share registration or CREST whether dealt with internally or by third party	Permanently
Accounting & tax records	
Accounting records to comply with legislative balance sheet and profit and loss account or such abbreviated accounts	6 years
Budgets and periodic internal financial reports	6 years
Tax returns and records	Permanently
VAT records	
VAT records, including all relevant documentation, accounts and statements for the filing of tax returns	6 years
Banking records	
All cheques, bills of exchange & other negotiable instruments, counterfoils, statements, reconciliations (including electronic communications)	6 years
Instructions to banks (including electronic communications)	6 years after ceasing to be effective
Intellectual Property	
Documents evidencing assignment of trade/service marks and designs	Permanently
Certificates of registration and proof of renewals of trade/service marks and designs	6 years after cessation of registration
Intellectual property agreements and licences	Permanently
Certificates of grant and proof of payment of annuities of patents and Utility models	6 years after cessation of right
Documents evidencing assignment of patents and Utility Models	Permanently
Documents evidencing assignment of rights from inventors	Permanently
Documents evidencing acceptance to VIAP policy	Permanently
Materials for which copyright protection is claimed	Permanently

Employee Records		
Candidate Records	Recruitment application forms and interview notes (for unsuccessful candidates)	1 year
Employee General Records	Personnel files including disciplinary and working time records and (non HSE) training records	6 years after employment ceases
	Senior Management Records	6 years after employment ceases (some directorship exemptions)
Employee Financial Records	Payroll and wage records (including details on overtime, bonuses, expenses and benefits in kind) and income tax records (P45, P60, P58, P48 etc.)	6 years after employment ceases
	Redundancy details, calculations of payments, refunds, notification to the Secretary of State	6 years after employment ceases
Pension Records	Pension records	12 years after benefit ceases
	Pension scheme investment policies	6 years after employment ceases
Employee Health and Safety Records	HSE Training records	6 years after employment ceases
Other Employment Related Records	Subject Access Requests	1 year following completion of the request.
	Whistle Blowing documents	6 months following the outcome (if a substantiated investigation). If unsubstantiated, personal data should be removed immediately.
	Labour Agreements / Collective Agreements	6 years after employment ceases
	Works council minutes/Union Memberships	Permanently
Claims and Litigation		
Claims correspondence	6 years after settlement including CLR attachments *see derogations	
Health & Safety		
Record of consultations with safety representatives & committees	Permanently	
Assessments under health & safety regulations	Permanently	
Record of reportable injuries and diseases/accident book <i>For occupational health-related illnesses in line with some national laws</i>	Permanently/up to 40 years	

these records can be kept for up to 40 years post employment (e.g. Respiratory diseases; Skin conditions; Musculoskeletal disorders (MSDs), Hearing loss, Mental health conditions, asbestos, cancer etc.)	
General register and other records required to be kept under local legislation where no other provision is made	Permanently
Insurance	
All insurance policies	Permanently
Property Documents	
Deeds of title	Until sold or transferred
Leases and related documents	12 years after termination or expiry
Agreements with Contractors and Consultants	6 years after termination or expiry
Charitable and political donations	
Deeds of covenant (where Vesuvius is the donee)	Permanently
Documents evidencing entries in accounts re donations	6 years
Contractual and Trust Agreements	
All commercial contracts	6 years after termination or expiry
Trust deeds	12 years after termination or expiry

APPENDIX B - Country Derogations

Australia

Employee records

In the case of any employee records retention period being 6 years in this document retention policy, for Australia a period of 7 years from end of employment shall be applied.

Brazil

Employee records

The following shall be added:

FGTS – Employee's Severance Guarantee Fund (FGTS).	30 years
PPRA – Environmental Risk Prevention Program.	30 years

Colombia

Employee records

In the case of any employee records retention period being 6 years in this document retention policy, for Colombia a period of Permanently shall be applied.

Germany

Accounting & tax records

For accounting and tax records with a retention period of 6 years in this document retention policy, a period of 8 years shall be applied for Germany.

Employee records

In the case of Employee records the following table shall be substituted for the relevant table within this document retention policy and shall be applied for Germany:

Employee Records		
Candidate Records	Recruitment application forms and interview notes (for unsuccessful candidates)	a period of 6 months after rejection shall be applied. Such retention period may be longer in the case of an application pool where consent has been provided
Employee General Records	Personnel files including disciplinary and working time records and (non HSE) training records	6 years after employment ceases
	Senior Management Records	6 years after employment ceases (some directorship exemptions)
Employee Financial Records	Payroll and wage records (including details on overtime, bonuses, expenses and benefits in kind) and income tax records (P45, P60, P58, P48 etc.)	Only relevant for social security, tax audits and annual financial statements 8 years, starting from the calendar year of departure
	Redundancy details, calculations of payments, refunds, notification to the	8 years after employment ceases

	Secretary of State	
Pension Records	Pension records	30 years after benefit ceases
	Pension scheme investment policies	30 years after employment ceases
Employee Health and Safety Records	HSE Training records	As long as required
Other Employment Related Records	Subject Access Requests	3 years following completion of the request.
	Whistle Blowing documents	3 years following the outcome (if a substantiated investigation). If unsubstantiated, personal data should be removed immediately.
	Labour Agreements / Collective Agreements	6 years after employment ceases
	Works council minutes/Union Memberships	The works council is required to destroy any documents that are no longer needed at the end of the election period.

Health and Safety Records

In the case of "Record of reportable injuries and diseases/accident book", for Germany a period of 5 years shall be applied.

Property Documents

In the case of "Leases and related documents", for Germany a period of 8 years after termination or expiry shall be applied.

Charitable and political donations

In the case of "Charitable and political donations", for Germany a period of 8 years shall be applied

Contractual and Trust Agreements

In the case of "All commercial contracts", for Germany a period of 8 years shall be applied

India

Company Secretarial Records

The following shall be added:

Minutes of every meeting of shareholders (including postal ballot), creditors (if any), Board of Directors or any committee(s) of the Board	Permanently
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General

For any record types with a retention period of 6 years in this document retention policy, for India a period of 8 years shall be applied instead.

In addition the following changes apply to the document retention periods in the policy:

- Proxy forms/polling cards - no poll demanded - 8 years
- Proxy forms used at meetings convened by court - 8 years
- Cancelled share/stock certificates - 8 years
- Notification of change of address - 8 years
- Subject Access Requests - 3 years
- Whistle Blowing documents - 8 years from closure

Claims correspondence

In the case of claims correspondence an additional retention period of 12 years after date of court decree or arbitration award shall be applied for India.

Property Documents

In the case of Deeds of Title and related documents, for India permanent retention shall be applied for India.

Indonesia

Employee records

In the case of any employee records retention period being 6 years in this document retention policy, for Indonesia a period of 10 years from end of employment shall be applied.

Italy

Employee records

In the case of any medical records and certificates retention period being 6 years in this document retention policy, for Italy a period of 10 years from entry shall be applied.

Japan

Employee records

Working time records including overtime, annual holiday, time off for dependents, etc	7 years after employment ceases
Income tax records (P45, P60, P58, P48 etc.)	7 years after employment ceases

Russia

Employee records

In the case of any employee records retention period being 6 years in this document retention policy, for Russia if employment ceased by 1 January 2003, then these documents must be preserved for 75 years; if later than that date a period of 50 years after employment ceased shall be applied.

United Arab Emirates

Employee records

In the case of any employee records retention period being 6 years in this document retention policy, for UAE a period of "Permanently" shall be applied.

Version 2.0 Updated 3rd September 2025

- Deletion from HR Records - Record of reportable injuries and diseases/accident book
- Further definition HSE Records - Record of reportable injuries and diseases/accident book
- Additional exemptions : Germany and India