Vedanta Resources Plc

Sustainability Governance System

Management Standard

Documentation and Records Management

Management Standard – Documentation and Records Management

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DATE	**REVISION NUMBER**	**CHANGE SUMMARY**
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Confidentiality

Management Standard – Documentation and Records Management

1.   PURPOSE

The purpose of this Management Standard is to set clear processes for controlling documents and managing records to ensure sustainability information is up-to-date and accessible.

2.   SCOPE

This Management Standard is mandatory and applies to all Vedanta subsidiaries and their operational or managed sites including new acquisitions, corporate offices and research facilities and to all new and existing employees. This Standard is applicable to the entire operation lifecycle (including exploration and planning, evaluation, operation and closure).

3.   DEFINITIONS

Definitions of key terms and concepts used in this document are shown in the following table.

Term	Definition
Competency	A combination of knowledge, skills and behaviours which enable individuals to undertake responsibilities and perform activities to a recognised standard and quality on a consistent basis.
Competent person	An individual who has the necessary and sufficient knowledge, skills and behaviours as well as the necessary experience (practice) to complete their responsibilities safely, effectively and consistently.
Document	Information that changes and its supporting medium (paper, electronic files, photographs, discs, maps etc).
Documentation	The materials used to describe, and that are part of, a management system, including an over-arching Management System manual.
Operation(s)	A location or activity that is operated by a Vedanta Company and is part of the Vedanta Group. Locations could include mines, refineries, ports or transportation activities, wind farms, oil and gas development sites, offices including corporate head offices and research and development facilities.
Management System Manual	A compilation document that provides information on how the management system operates, the constituents/elements that make up the management system and how those constituents/elements interact to effectively manage sustainability issues.
Manager	A Vedanta operation employee (or contract employee) who has other persons reporting to them or who has the authority to allocate resources.
Record	Information that does not change once recorded and its supporting

Term	Definition
	medium (paper, electronic files, photographs, discs, maps etc).
Resources	Resources may include financial, human and specialised skills, organisational infrastructure, plant, equipment and technology.
Top Management	All managers, and their line reports, that report directly to the most senior manager who has ultimate accountability at a Vedanta operation (who may also be a senior manager of one of Vedanta's subsidiary companies). A top management structure may also exist at the subsidiary Company level and Vedanta Group level.
Vedanta Company	A subsidiary of Vedanta Group either fully or majority owned that has its own management structure (e.g. Hindustan Zinc Limited, Vedanta Aluminium Limited, Sterlite Industries limited, etc.)

4.   PROGRAMME REQUIREMENTS

This standard (and the international standards on which it is based) make a distinction between:

- Documents, which are live materials that require updating from time to time (for example, emergency plans); and
- Records, which are historical records of information (e.g. waste data from 2007).

Documents must be kept up-to-date, while records must be filed carefully so their information can be retrieved. Documents and records can be paper, electronic files, photographs or any other media. Documents and records are any materials that contain information.

This standard describes the key requirements of an effective document and record control system.

In addition, international standards refer to "Documentation", which means all the procedures that make up a management system, and particularly an over-arching manual that describes how the elements of that system fit together.

4.1.   Creation of a Clear Filing System

a)   Vedanta Group and Vedanta operations shall develop and maintain a clear filing system that allows staff to easily retrieve the information and be sure that it is the most recent version. The filing system can either be an electronic system, a paper system, or a combination of the two. Regardless of the medium used, the files shall be:

- *Kept in a central location* so that relevant staff can access them when needed. Such a location may be an intranet, a shared server or a common filing room managed by administrative staff. Personal filing cabinets are not usually suitable.

- *Easy to find*. The filing system must therefore divide the documents and records into topics in a logical manner that can easily be followed by all staff. Documents and records cannot be stored without ordering into topics and chronological order.
- *Filed promptly*. The filing system must ensure that information is filed as soon as possible. The timeframe for filing must be defined and communicated to staff.
- *Clearly labelled*. Material must be given a clear filename so that staff can understand what information is contained within the document/record, and whether it is the latest information. This is discussed under "identifiers".

b) The location and rules of the filing system shall be clearly documented and explained to all staff who may store sustainability information or access information from the system.

4.2. Version Identification

a) Vedanta Group and Vedanta operations shall develop a written version control process for documents. Version control makes it is easy to assess which version of a document is being read, how many times the document has been updated and who has authored and approved it.

4.3. Creation of Templates

a) Operations shall identify documents and records that require templates and shall develop suitable templates where required. Examples of templates that may be generated include the following:

- Policies
- Procedures and work instructions
- Meeting minutes
- Monitoring results
- Training attendance records
- Position Descriptions
- Letters, memos and other correspondence
- Emergency contact lists
- Action Plans

It is recommended that templates include sections that allow:

- The document title on each page
- Page numbering on each page (page X of Y)
- The filepath on each page
- Version numbers and dates on each page

b) Where templates are developed, these shall be communicated to all potential users.

4.4. Creation of Unique Identifiers for Documents and Records

a) Documents and records shall each have a unique identifier so that they can be distinguished from any other material and can be easily retrieved.

b) Operations shall document the process for creating, allocating and approving unique identifiers and shall communicate this to relevant staff.

c) Suitable unique identifiers will vary for each location. Unique identifiers shall provide information on:
- The location to which the document/record applies;
- The nature of the document/record; and
- The version and/or date of the document/record.

4.5. Process for Authoring and Approving Documents

a) Documents providing instruction on sustainability matters shall be written by competent personnel (internal or external) who understand the technical issues and their implications for the operation. Once authored, the content of the documents shall be reviewed and approved by senior management to ensure that the documents meet the required approach. Each operation shall identify:

- the personnel who are authorised to prepare and amend documents on particular topics (document authors); and
- the senior personnel who are authorised to review and approve documents on particular topics (document approvers).

b) The list of authors and approvers shall be shared with the authors/approvers themselves and other staff who may be affected.

c) The authors and approvers will each have clearly defined responsibilities for matters such as:

- Consulting with other staff;
- Integrating the contents of the document with Vedanta company requirements;
- Ensuring that the document meets this standard (for example, version control and templates are used);
- Ensuring that the contents are technically correct;
- Ensuring that the contents are easy to understand and are grammatically correct;
- Providing the document with a unique identifier;
- Placing the document in the storage system;
- Identifying personnel who might be affected by the document and notifying those personnel of the creation or amendment of the document so they can access it;
- Identifying training requirements associated with the document and discussing these with the relevant personnel;
- Identifying other implementation requirements associated with the document and discussing these with the relevant personnel.

The operation shall decide which responsibilities belong to the author and approver, and these responsibilities shall be clearly described in a procedure that is provided to the authors and approvers.

4.6. Identification of Review Periods for Documents

a) Operations shall decide on a suitable frequency of review for documents, and shall identify any documents that due to their nature require more frequent review.

b) Operations shall identify the individuals who organise and undertake the review. The organiser is usually the author or the document controller (see below). The reviewer may be any competent person with the appropriate technical knowledge of the subject matter.

c) Operations shall identify the responsibilities of the organiser and the reviewer. The person who organises the review is usually responsible for ensuring that the review is conducted within a reasonable timeframe.

d) Operations shall decide how long a review should take, so that consultation and updates do not extend over months. Typical document review timeframes are two to eight weeks.

e) Each document should contain a section that describes the review process, including the frequency of review, the roles responsible for organising and conducting the review, and the timetable in which the review is required.

4.7. Process for Removing Obsolete Documents (Document Control)

a) Operations shall develop a documented procedure for managing obsolete documents.

b) Operations shall develop a process for identifying controlled and uncontrolled documents.

c) Operations shall develop a process for marking superseded versions of documents so that they cannot be mistaken for current copies.

d) Operations shall identify personnel to undertake the following tasks:
- Maintaining a list of controlled hard copies;
- Retrieving superseded hard copies and replacing these with new copies;
- Ensuring that superseded electronic copies are clearly marked as superseded;
- Organising scheduled document reviews (discussed in other sections);
- Maintaining filing systems (discussed in other sections);
- Archiving records (discussed in other sections).

4.8. Identification of Retention Periods for Records

a) Operations shall review the types of records used and determine appropriate retention times. The retention period for records will depend on legislation, company requirements and whether the information is likely to be needed in the future.

b) The record retention process shall include both a process for filing the records so that their age is known and also a process for destruction of records where they are no longer required (many records contain confidential information and must be effectively destroyed).

4.9.   Confidentiality

a) Operations shall develop a process for managing confidential records and documents that includes:

- Identification of the types of documents and records that may be confidential (e.g. personnel health records);
- Identification of personnel who are authorised to view those records and documents;
- Development of a filing system that restricts confidential records and documents to authorised personnel;
- A destruction process for records that are no longer required that maintains the confidentiality of those records or documents.

5.   ROLES AND RESPONSIBILITIES

Vedanta Resources, subsidiaries, businesses, operations and sites shall ensure that roles and responsibilities for implementing and complying with this Standard are allocated. Key responsibilities shall be included in job descriptions, procedures and/or other appropriate documentation.

6.   COMPLIANCE AND PERFORMANCE

Each Vedanta operation shall ensure they comply with the requirements of this standard. Performance against meeting the requirements of this Standard shall be periodically assessed, documented and, where required, reported to Vedanta Group.

The assessment of performance shall include setting and reporting on key performance indicators (KPIs) where these have been established at Vedanta Group, Company or local level and which meet the requirements as set out in the *Sustainability Data Management Technical Standard*.

The evaluation of performance shall include, as a minimum, confirmation that:

a) Authors, approvers and document controllers have been identified;

b) A clear filing system has been created;

c) Unique Identifiers are used on all materials;

d) A process for authoring and approving documents and records has been developed;

e) Document reviews are being conducted according to a clear schedule by competent personnel;

f) A clear process for identifying and removing potentially obsolete documents has been implemented; and

g) Retention Periods for Records have been identified; and

h) A clear process for managing confidential records and documents has been implemented.

7. REVIEW

This Management Standard shall be periodically audited and reviewed to determine its accuracy and relevance with regard to legislation, education, training and technological changes. In all other circumstances, it shall be reviewed no later than 24 months since the previous review.

8. REFERENCES

Doc. Ref.	Title
MS 14	Management Review and Continual Improvement Management Standard
MS 12	Auditing and Assurance
MS 10	Performance Monitoring, Data Management and Reporting Management Standard