

TECTRIL

Document Retention and Disposal Policy

Governance of the lifecycle of physical and digital documents and records

This policy establishes criteria for the creation, classification, retention, access, preservation and secure disposal of Tectril records.

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Classification	Institutional use — publication subject to approval
Owner	Compliance, Privacy and record-owning functions
Approval	Tectril Executive Management
Effective date	Upon formal approval

INSTITUTIONAL DRAFT. The retention schedule must be reviewed by legal, accounting, tax, labor and privacy specialists before approval and implementation.

1. Purpose

To establish consistent rules for managing the lifecycle of Tectril documents and records, ensuring availability, integrity, authenticity, confidentiality, traceability and secure disposal, without excessive retention of personal data or loss of required evidence.

2. Scope

This policy applies to directors, employees, temporary workers, interns and third parties who create, receive, use, store or dispose of records on behalf of Tectril Soluções em Logística e Comércio Ltda., regardless of country, function, format, system, device or storage location.

- Paper, microfilm and other physical media.
- Electronic files, databases, corporate systems, cloud services, email, messages and recordings.
- Customer, supplier, partner, customs, finance, people, compliance, privacy, security, OHS and Integrity Channel records.
- Copies, backups, system exports and records held by processors or contracted service providers.

3. Principles

- Purpose and necessity: retain only what is needed for legitimate, documented purposes.
- Compliance: observe laws, contracts, regulatory requirements and rules of the countries involved.
- Integrity and authenticity: protect content, context, authorship, dates and audit trails.
- Least access: restrict access by role, sensitivity and need to know.
- Availability and recovery: keep records searchable and readable throughout the retention period.
- Defensible disposal: dispose of records consistently, with authorization, evidence and irreversibility.
- Longest valid period: where requirements conflict, apply the longest valid retention period.

4. Definitions

Document or record means information created or received as evidence of an activity, decision, obligation, transaction or right. Official record means the recognized authoritative version. Record owner means the function responsible for content and retention. Official repository means an approved storage and retrieval environment. Retention period means the minimum preservation period. Disposition means secure destruction, anonymization, return, transfer or permanent preservation. Legal hold means an instruction suspending alteration or disposal.

5. Classification and authoritative source

Each function shall identify its records, classify them by process, sensitivity and obligation, and store the official version in an approved repository. Convenience copies must not replace the authoritative source. Confidential information, sensitive personal data, trade secrets, credentials and investigations require enhanced protection.

- Record category name and description.
- Owning function and authorized persons.
- Event starting the retention period.
- Applicable period and basis.

- Official system or location.
- Final disposition and whether a destruction certificate is required.

6. Calculation and review of periods

The period starts on the event defined in the schedule, such as contract expiry, termination of employment, completion of an operation, payment, final decision or replacement of a version. Record owners shall review retention needs at least annually and notify Compliance and Privacy of relevant legal, contractual or operational changes.

Safety rule: no period in this policy authorizes disposal while an investigation, audit, inspection, dispute, incident, authority request, pending data-subject request or preservation order exists.

7. Disposal suspension (legal hold)

When an event may require preservation, Legal, Compliance, Privacy or Executive Management may issue a legal hold identifying scope, custodians, systems, period and release criteria.

- Immediately suspend manual and automated deletion.
- Preserve relevant documents, metadata, messages, attachments, logs and backups.
- Notify custodians and obtain confirmation of compliance.
- Control access and chain of custody.
- Resume retention only after written release by the issuing function.

8. Storage, access and security

- Use only approved repositories, accounts and devices.
- Apply role-based access, authentication, activity logging and encryption where appropriate.
- Maintain backups and restoration tests proportionate to criticality.
- Do not keep official records solely in personal mailboxes, messaging apps, local computers or unmanaged removable media.
- Require service providers to meet retention, return, portability and deletion obligations at contract end.
- Preserve readability and migrate obsolete media or formats when necessary.

9. Personal data

Personal data shall be retained only as long as necessary for the purpose or an authorized legal retention ground. At the end, it shall be deleted, anonymized or blocked unless continued retention is permitted. Tectril shall document the basis, purpose, period and access controls and respond to data-subject requests without deleting evidence required by law or for the regular exercise of rights.

10. Secure disposal and evidence

Disposal requires confirmation that the period has expired, no legal hold exists and the record owner has authorized the action. The method must prevent reconstruction or unauthorized access.

- Paper: secure shredding or certified destruction.
- Media: sanitization, overwriting or physical destruction appropriate to risk.

- Systems and cloud: logical deletion and, where applicable, expiration from backups under the technical cycle.
- Structured data: deletion, irreversible anonymization or validated aggregation.
- Third parties: destruction certificate or equivalent evidence.
- Disposal log: category, covered period, volume, method, date, approvals, performer and exceptions.

11. Responsibilities

11.1 Executive Management

Approve this policy, provide resources and decide material exceptions.

11.2 Compliance, Legal and Privacy

Advise on requirements, coordinate legal holds, assess risks, monitor compliance and promote updates.

11.3 Record-owning functions

Inventory records, identify the authoritative source, apply periods, authorize disposal and retain evidence.

11.4 Information Technology and Security

Implement technical controls, backups, logs, preservation, recovery and secure deletion.

11.5 Users and third parties

File records correctly, protect them, comply with holds and never delete, alter or remove them without authorization.

12. Exceptions, incidents and consequences

Exceptions require documented justification and approval by Compliance, Privacy, Legal or Executive Management according to risk. Loss, unauthorized alteration, disposal or access must be reported immediately to compliance@tectril.com.br and, where personal data is involved, to privacidade@tectril.com.br. Violations may lead to disciplinary, contractual and legal action.

13. Minimum corporate retention schedule

The schedule below is an initial corporate baseline. Each function must confirm the specific legal or contractual period and the correct triggering event in its inventory. “End + period” means from final closure unless another rule applies.

Category	Examples of records	Minimum period	Notes
Corporate and governance	Articles, amendments, minutes, strategic powers of attorney and governance records	Permanent	Preserve signed versions and corporate history.
Policies and governance	Approved policies, codes, approvals and revision history	Validity + 10 years	Historically significant versions may be permanent.
Accounting, fiscal and tax	Ledgers, filings, invoices, payment slips, calculations and support	10 years	Conservative baseline; extend for credits, installments, assets or disputes.

Category	Examples of records	Minimum period	Notes
Customs and global trade	DI/DUIMP, DU-E, LI/LPCO, invoices, packing lists, transport documents, special regimes and closure evidence	10 years after closure	For suspended regimes or pending matters, count after final extinction/decision.
Contracts and third parties	Contracts, accepted proposals, amendments, due diligence and performance evidence	End + 10 years	Warranties, indemnities or investigations may extend the period.
Customers and operations	Orders, instructions, approvals, operational evidence, billing and material communications	Closure + 10 years	Avoid duplicates without evidentiary value.
Finance and banking	Statements, payments, reconciliations, funding, foreign exchange and receipts	10 years	Observe banking, tax and contractual requirements.
Employment and personnel	Personnel file, time, leave, benefits, payroll and termination	End + 5 years; payroll: 10 years	Social security, FGTS and employment evidence may require longer.
OHS and occupational health	PGR, PCMSO, ASO, occupational medical records, exposure and accidents	20 years or longer legal period	Restricted access; specific rules apply to medical and exposure records.
Unsuccessful recruitment	CVs, assessments and candidate communications	6 months	Longer only with documented consent or other legal ground.
Privacy and security	Inventories, assessments, consents, rights requests, incidents, logs and evidence	5 years after closure	Technical logs may be shorter; preserve compliance evidence.
Application access	Internet application access logs where Tectril is a legally obligated provider	6 months	Apply the Brazilian Internet Act and security controls.
Integrity Channel and investigations	Reports, triage, investigation, actions and evidence	Closure + 10 years	Strict segregation, confidentiality and access restriction.
Legal and disputes	Advice, notices, proceedings, settlements and evidence	Final closure + 10 years	Legal hold prevails; foundational records may be permanent.
Marketing and website	Approvals, campaigns, image licenses, published versions and metrics	Closure + 5 years	Licenses and assignments follow contract or permanent term.
CCTV and physical access	Footage and entry/exit records	30 to 90 days	Unless an incident, investigation or contract requires longer.
Email and messages	Communications with decision, contract, tax, operational or evidentiary value	According to content category	File in the official repository; mailboxes are not permanent archives.
Copies and drafts	Duplicates, interim versions and notes with no legal or operational value	Up to 90 days	Delete when no longer useful, subject to any hold.
Backups	Security copies of systems and repositories	30 to 180-day technical cycle	Backups do not replace official archives; secure rotation applies.

14. Implementation procedure

- Assign owners by category and complete the repository inventory.
- Validate periods with Legal, Accounting, Tax, HR, OHS, Privacy and Global Trade.
- Configure automation only after validation and testing.
- Create a legal-hold form and central disposal log.
- Train users and include obligations in third-party contracts.

- Perform annual reviews and sample audits.

15. Monitoring and review

Compliance shall coordinate review at least annually or upon a material legal, technological, contractual or operational change. Metrics may include inventoried categories, active holds, certified disposals, exceptions, incidents and non-standard repositories.

16. Final provisions

This policy takes effect upon formal approval. When in doubt, temporary preservation and consultation with Compliance, Legal or Privacy shall prevail. A minimum period does not authorize indefinite retention without purpose or lawful basis.

17. Main regulatory references

- Brazilian Law No. 13,709/2018 — General Data Protection Law (LGPD), particularly Articles 15 and 16.
- Brazilian Law No. 12,965/2014 — Brazilian Internet Act, where application access logs are concerned.
- Brazilian Law No. 5,172/1966 — National Tax Code, including limitation rules.
- Applicable Civil Code, labor, social security, OHS, fiscal and customs requirements.
- Contracts, licenses, authority orders and requirements in countries where Tectril operates.

18. Approval and revision control

Stage	Owner	Date	Record/signature
Drafting / review	Compliance and Privacy	___/___/___	_____