

Records and Information Management Policy

Owner: Director, Enterprise Assurance, Compliance & Internal Audit

Effective date: May 25, 2012

Last updated: May 25, 2012

Last reviewed: May 15, 2018

Purpose

This policy and its related practices address the management of corporate information from its creation or acquisition through to its use, modification, distribution, storage, accessibility, communication and disposition or destruction. Cenovus is committed to the management and protection of its corporate information. Information in any medium, including electronic and paper based, is deemed a valuable corporate asset.

Scope

Corporate information includes records that document Cenovus business transactions, decisions and activities. Records provide evidence of adherence to Cenovus policies, controls and standards, as well as the operational, contractual, statutory and regulatory requirements for all areas in which Cenovus conducts its business. Cenovus recognizes that processes, information systems and infrastructure for capturing, sharing, reporting and storing relevant corporate information enables Cenovus to conduct its business efficiently, effectively and securely.

Policy Statements

Corporate information, including intellectual property, developed by, or for Cenovus is to be treated as Cenovus property. Cenovus must also protect the privacy and property rights of others. Corporate information obtained and used by staff under confidentiality or licence agreements must be handled according to the terms of the agreement.

All Cenovus staff and service providers are required to:

- Manage and protect Cenovus's corporate information in accordance with this policy and related practices, including statutory and regulatory requirements
- Take accountability for appropriate security, access and retention of any specific corporate information entrusted to them
- Understand the implications of corporate information mismanagement and misuse, including the potential costs and risks to Cenovus, our staff and business associates
- Report incidents and assist in investigations relating to corporate information mismanagement and misuse

Compliance and Enforcement

Consequences of Non-compliance

Violations of this policy include, but are not limited to:

- Unsanctioned activities that disrupt or prevent access to, or control of, Cenovus's corporate information
- Failure to properly handle and protect corporate information and records
- Using or disclosing corporate information in a manner that damages Cenovus's reputation or business
- Attempts to circumvent this policy and related practices, controls and standards
- Failure to comply with applicable laws, contractual obligations, or statutory and regulatory requirements
- Failure to comply with acceptable use of corporate information as outlined within the Code of Business Conduct & Ethics

Disciplinary action, up to and including termination of employment or service contracts, will be taken for violations of this policy and its related practices.

Glossary

Corporate information – Corporate information is any information relating to the business and affairs of Cenovus, whether owned by Cenovus or another party