

Records and Information Management Policy

May 25, 2012

Cenovus is committed to the management and protection of its corporate information¹. Information in any medium, including electronic and paper based, is deemed a valuable corporate asset. 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.

Corporate information includes records² 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.

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.

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.

All Cenovus staff³ and service providers⁴ 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

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

¹**Corporate information** – Corporate information is any information relating to the business and affairs of Cenovus, whether owned by Cenovus or another party.

²**Record** – Information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business. (From ISO 15489 2001:1)

³**Staff** – Individuals who conduct work and/or provide services for the benefit of Cenovus, including employees⁵ and contractors⁶, but excluding service providers⁷.

⁴**Service providers** – Individuals who provide services through a services company (e.g. HP, Accenture, Benchmark Engineering, Sure Flow, etc.), under a service agreement (e.g. MSSA, MESA, MSA, CSA, etc.). Individuals are not screened and selected by Cenovus, but the services company ensures they have the competency or safety related training as required to provide services on Cenovus sites. Services can be cyclical, seasonal, short or long-term. The services company pays the individuals through the services company's payroll, provides workers' compensation coverage and specified levels of insurance, and makes statutory remittances for the individuals.

Service provider types include:

- On-site service provider:
 - individuals who provide services on Cenovus premises and that require some Cenovus infrastructure
 - sample job title: Service Provider Camp Manager, Service Provider Completions Supervisor etc.
- Off-site service provider:
 - individuals who provide services off Cenovus premises and that typically require no Cenovus infrastructure
 - sample job title: Service Provider Thermal Assistant, Service Provider Instrumentation Technician etc.
- Access only:
 - individuals who require building access only and require no other Cenovus infrastructure
 - sample job title: Service Provider IT Client Services, Service Provider IT Developer etc.

⁵**Employee** – Individuals employed by Cenovus and on Cenovus's payroll.

⁶**Contractor** – Individuals who are engaged through an external company to provide services related to day to day business, operations, or on a specific project of Cenovus. Individuals are screened and selected based on their particular knowledge, skills and capabilities, and typically have an expected start and end date. The company pays the individuals through the company's payroll, provides workers' compensation coverage and specified levels of insurance, and makes statutory remittances for the individuals.

Contractor types include:

- Agency contractors:
 - individuals who are engaged through an agency, such as Bowen or Diversified; may include potential candidates that the agency may identify for consideration to Cenovus
 - sample job title: Contract Accountant, Contract Drilling Supervisor etc.
- Students:
 - individuals who are agency contractors who are coordinated by Cenovus's campus recruitment team
 - sample job title: Student Engineer, Student Geologist, etc.
- Independent contractors:
 - individuals who are engaged through a personal services or numbered company who provide services to Cenovus through a service agreement (e.g. MSSA, MESA, MSA, CSA, etc.)
 - sample job title: Contract Electrician, Contract Health & Safety Advisor, etc.