

VerseOne Group (“VerseOne”) Records Management Policy

1. Overall commitment and role of records management

VerseOne recognises that effective management of our records of all formats is a cornerstone of supporting the core functions of the business, enabling us to deliver valuable content management and digital transformation solutions. Effective records management is also essential to meeting our legal and regulatory obligations while demonstrating our transparency and accountability. Business content is the most valuable asset of any business, for communication, operations, and effective decision-making, and must be managed responsibly throughout its life cycle from creation until disposal or deletion.

All activities and business data fall within the scope of this policy and it is a responsibility of every member of VerseOne staff to conform to it, regardless of whether it is listed specifically in their job specification.

The purpose of this policy is to:

- highlight the importance of effective records management within the company;
- list the key aims and objectives for records management;
- serve as a mandate for the support and delivery of good records management practice across the organisation.

VerseOne's policy is to maintain authentic, reliable, and usable records that support business functions and are susceptible of amendment or disposal in accordance with legislation and regulations.

2. Related policies

This policy exists within a wider policy framework at VerseOne which also includes:

- Data Protection Policy
- Information Security Policy
- Business Continuity Plan
- IT and Acceptable Use Policy
- Quality Policy

3. Types of records

VerseOne maintains records providing evidence of functions, activities, and transactions related to the essential operation of the business, including records of:

- Clients and orders
- Suppliers and purchases
- Financial transactions
- Projects and solution support
- Technical implementation
- Staff and personnel management.

4. Programme of management

Our records management programme includes:

- Under ISO 9001:2015 certification, the maintenance of an intranet and documents register for controlled documents, recording life cycle events;
- The regular review of information held in business software systems, including those used for finance, sales and marketing, project delivery, and support, to ensure accuracy, completeness, and continued relevance and necessity;
- The regular review and updating of an organisational Information Asset Register and risks related to information types held therein;
- The regular review and internal audit of data retention and disposal procedures for types of data held in the Information Asset Register;
- The regular review and internal audit of information security procedures in order to protect data from misuse, unauthorised access, amendment, or destruction;
- The regular review and internal audit of a Business Continuity Plan detailing plans for maintaining the accessibility and integrity of records;
- The provision of staff training on records management as part of our Data Protection Policy.

5. Roles and responsibilities

All staff are responsible for managing records effectively, in line with this policy and with internal team procedures relating to types of records. All managers of business areas are responsible for developing and enforcing an approach to specific recordkeeping procedures and practices within their business area, and for regular review and internal audit of these where applicable.

The overall responsibility for records management lies with the Board of Directors via the Data Protection Officer and the Quality Manager.

6. Compliance

VerseOne's records management is carried out in line with relevant legislation, regulation, and standards.

7. Monitoring and review

This policy is regularly monitored and reviewed to ensure that it takes account of changes in the legislative, regulatory, and internal policy framework, as well as innovations and developments in good practice.