

Policy Number & Title:

00-LGL-11**NORTH AMERICAN CORPORATE-WIDE
RECORDS RETENTION POLICY AND
GUIDELINES**Version: **1**Effective Date: **March 25, 2016**Function:
LEGALSupersedes:
October 2014Approver: **Scott Mikuen - SVP & General Counsel**
//Signature on File//

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1.0 OVERVIEW**1.1 Purpose & Scope**Purpose:

- To establish a company-wide retention schedule for North America based locations and operations for identifying and maintaining records for operational integrity, historical review, litigation, claims, government inquiries, compliance, tax audits, and other internal business requirements.
- To establish a systematic procedure for record retention and timely destruction, and to ensure the availability of records storage space.
- To assign the responsibility for records retention.

Scope:

This Policy applies to all individuals located at United States and Canadian (cumulatively referred to herein as "North American") Harris Segments, Subsidiaries and Corporate Headquarters Departments. To the extent existing policies and procedures are inconsistent with this Policy and the guidelines herein, they are superseded.¹

International (defined herein to be other than "North American") Subsidiaries and Segments are required to establish appropriate record retention periods based upon local legal requirements.

Any questions about the applicability of this Policy should be directed to the Corporate Legal Department.

1.2 Key Terms

Records: The records referred to in this Policy include all original or duplicates of written records, electronic data, and other media maintained in the ordinary course of the business activities of Harris Corporation and its subsidiaries (hereafter "Harris") whether or not originally generated by Harris, or whether stored "on-site" or "off-site" with Harris or a third-party contractor responsible for maintaining Harris records.

1.3 Supporting Documents[00-LGL-11.01](#) Records Management Procedure[00-LGL-11.02](#) Record Retention Schedule**1.4 Administrative Guide**

- Retention periods set forth in 00-LGL-11.02 Record Retention Schedule are minimum requirements based upon legal and operational requirements. Under special circumstances, records may be kept beyond minimum retention times for business purposes or with the approval, or at the direction, of the Corporate Legal Department.

¹ Refer to possible inconsistencies in the following policies and procedures, among others: Policy Bulletin [HR-13](#); Corporate Procedure [HG-11](#); GCS Procedures [S-100-003 4.5](#), [S-100-003 6.25](#), [S-100-003 8.1](#), [S-132](#), [S-133](#), [S-350-100](#), [S-350-300](#), [S-350-302](#), [S-356-001](#), [S-310](#), [S-410](#), [S-411](#), [S-414](#), [S-600-450](#), [S-600-001 PMF-04-001](#), [S-815](#), [S-700-001](#), [SSO-1](#); and the [Environmental Health & Safety Document Retention Guideline](#).

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- Unless impracticable, record retention should not be duplicated. Records generated or received by Corporate Headquarters, Segments, or Subsidiaries should be retained by the function utilizing or making those records available in the ordinary course of business. Retention periods published in 00-LGL-11.02 Record Retention Schedule are established for general categories of records, since similar record types may be identified differently throughout the various functions of the Corporation. Employees should exercise good judgment in determining how long records which cannot be classified to one of the general categories listed in the schedule guideline should be retained. Any questions regarding the retention period for a specific record should be referred to the Corporate Legal Department.
- Records containing any extraneous and immaterial data (e.g., unnecessary preliminary drafts, rough notes, etc.) should be purged of that data in a timely fashion.
- Retention periods detailed in 00-LGL-11.02 Record Retention Schedule have been computed from July 1 of the fiscal year subsequent to the date the record was created. Thus, if a record is created on 2/15/15 and the retention period is two years, the record should be disposed of as soon after 7/1/17 as is practicable.

2.0 POLICY

All records shall be maintained as long as needed for business purposes. At a minimum, all records shall be maintained according to retention periods set forth in 00-LGL-11.02 Record Retention Schedule (hereafter referred to as "Record Retention Schedule").

All records existing beyond the retention period specified in the Record Retention Schedule that no longer have a business purpose shall be destroyed. For physical copies, destruction should be accompanied by shredding, recycling or other appropriate methods. For intangible records, electronic data, and other media, destruction should be accompanied by deletion, recycling, or other appropriate methods unless otherwise directed by the Corporate Legal Department.


2.1 Responsibility

Corporate Secretary's Office and Corporate Legal Department

- Periodically review and update this Policy and the Record Retention Schedule, and the destruction procedures with regard to revised legal or operational requirements.
- Provide for the permanent retention of historical documents within the Corporate Secretary's Office or Corporate Legal Department or joint archives by annual review of all records retention schedules.
- If legally required or to otherwise preserve records, issue directives, including litigation holds, to maintain records beyond the period set in accordance with this Policy.

Facilities/Shared Services

- Establish procedures and create methods which will provide Corporate Headquarters, Segments, and Subsidiaries with guidance to ensure physical and certain electronic records not specifically maintained by the Information Technology/IT Security Department (hereafter "IT Department") are available for internal use, and for storing and destroying records, other than electronic data and similar records specifically maintained by the IT Department, at locations other than those directly maintained by Subsidiaries, Segments, or Corporate Headquarters Departments. The procedures and methods shall be provided to the Corporate Legal Department and will include, without limitation, the following specific guidelines for storing and destroying records:
 - Proper inventorying of records delivered to storage pursuant to uniform company-wide methods with descriptions consistent with the Record Retention Schedule
 - Ensuring destruction dates are clearly marked on records delivered to storage

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- Instruction on destroying and accessing stored records
- Ensuring records are destroyed consistent with this Policy unless retained consistent with other written instructions from the Corporate Legal Department.
- Make storage available in consolidated locations for the retention of all records, except electronic data and similar records maintained by the IT Department.
- Establish and maintain a centrally accessible data base, including tracking and archiving capability, of all records received for storage and destruction by Corporate Records Management that will reflect, without limitation:
 - A description of the records stored consistent with the Record Retention Schedule
 - Date delivered for storage
 - Location from which the records were delivered
 - Status of destruction, including the date of destruction and any reasoning for retaining the records longer than the scheduled retention period.

Segment, Subsidiary and Corporate Headquarters Functional Staff Heads

- Monitor the function's compliance with the established retention periods and provide for periodic records retention compliance reviews by the Internal Audit Department in conjunction with their audit work.
- Advise the Corporate Legal Department of any necessary changes or variances from this policy.
- Internally maintain only those records necessary for the continuing operations of the function which, at a minimum, will be consistent with the Record Retention Schedule. Coordinate the delivery of records not needed for continuing operations to Facilities/Shared Services for retention consistent with this Policy.
- Develop procedures for the departments within those functions maintaining records in the ordinary course of business to ensure compliance with this Policy and provide those procedures to the Corporate Legal Department.
- Coordinate the delivery of records for which your function has retention responsibility to Facilities/Shared Services for destruction when the records have existed beyond retention periods, unless the Corporate Legal Department has given written authorization or direction to retain the records beyond the periods set in accordance with this Policy.
- Identify electronic data and similar records that must be stored by the IT Department consistent with this Policy, clearly mark or designate those records with a destruction date consistent with the schedule attached hereto, and issue a request to the IT Department to maintain those records accordingly.

IT Department

- Maintain electronic data and similar records for operational purposes only unless otherwise provided herein or directed by the Corporate Legal Department.
- Upon specific request made by segments, subsidiaries, or Corporate Headquarters departments, store electronic data and other related media consistent with the Record Retention Schedule.
- When implementing or updating Information Services systems, ensure the systems include the ability to eliminate records consistent with the operational requirements of the department and this Policy.

CHANGE LOG

| Date | Ver. | Change Made | By Whom |
|----------------|-------------|--------------------|----------------|
| March 25, 2016 | 1 | Replaces G11 | Kim Withers |