



Eletrobras

ELETROBRAS COMPANIES DOCUMENT AND CORPORATE INFORMATION MANAGEMENT POLICY

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Eletrobras Companies Document and Corporate Information Management Policy

Area responsible for issuing

Superintendency of Risk Management, Internal Controls and Information Security / Information Management and Security Area.

Target audience

Employees, managers and board members of Eletrobras companies.

Approval

Resolution RES-734/2021, of 11/22/2021, of the Eletrobras Executive Board of Directors.
Deliberation DEL-233/2021, of 12/16/2021, of the Eletrobras Board of Directors.

Repository

The policies of Eletrobras companies can be found on the website:
<https://eletrobras.com/pt/Paginas/Estatuto-Politicas-e-Manuais.aspx>

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Editing	Approval	Main changes
1.0	RES-592/2011.	Does not apply.
2.0	RES-767/2017, of 11/21/2017 and DEL-259/2017 of 12/15/2017.	Adjustments made considering: integration with the topic of information security, updating legislation regarding access to information and standardization among Eletrobras companies of the classification values to be adopted.
3.0	RES-734/2021, of 11/22/2021 and DEL-233/2021, of 12/16/2021.	Adjustments (change, exclusion, addition of concepts, bibliographic references, values and guidelines) carried out in accordance with legislation and new research in the information area, seeking to meet the current needs of Eletrobras companies.

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1 Objective

To establish values, guidelines and responsibilities to guide the structuring of the Document and Corporate Information Management process in Eletrobras companies.

2 References

- 2.1 Law No. 8,159, of 01/08/1991 - sets out the national policy on public and private files and provides other measures.
- 2.2 Law No. 12,527, of 11/18/2011 - determines the access to information provided for in the Federal Constitution. Also known as LAI – Access to Information Law.
- 2.3 Law No. 13,709/2018, of 08/14/2018 (General Personal Data Protection Law – LGPD).
- 2.4 Law No. 13,853, of 07/08/2019 (amends the General Personal Data Protection Law – LGPD).
- 2.5 Law No. 14,063, of 09/23/2020 - provides for the use of electronic signatures in interactions with public entities, in acts of legal entities and in health matters and on software licenses developed by public entities; and, amends Law No. 9,096, of 09/19/1995, Law No. 5,991, of 12/17/1973, and Provisional Measure No. 2,200-2, of 08/24/2001.
- 2.6 Provisional Measure No. 2,200-2, of 08/24/2001 - establishes the Brazilian Public Key Infrastructure - ICP-Brasil, transforms the National Institute of Information Technology into an autonomous agency, and provides other measures.
- 2.7 Decree No. 1,799, of 01/30/1996 - regulates Law No. 5,433, of 05/08/1968, which regulates the microfilming of official documents, and provides other measures.
- 2.8 Decree No. 4,073, of 01/03/2002 - regulates Law No. 8,159 of 01/08/1991, which establishes the national policy on public and private archives and provides other measures.
- 2.9 Decree No. 4,915, of 12/12/2003 - provides for the Archive Document Management System – SIGA, of the federal public administration, and provides other measures.
- 2.10 Decree No. 7,724, of 05/16/2012 - regulates Law No. 12,527 of 11/18/2011.
- 2.11 Decree No. 10,148, of 12/02/2019 - establishes the Coordination Committee for the Document and Archive Management System of the federal public administration, provides for the Permanent Document Assessment Committee, the Coordination Subcommittees for the Document Management System and Archives of the Federal Public Administration and the National Archives Council, and provides other measures.
- 2.12 Decree 10,278, of 03/18/2020 - regulates the provisions of item X of the head provision of art. 3 of Law No. 13,874, of 09/20/2019, and of art. 2-A of Law No. 12,682, of 07/09/2012, to establish the technique and requirements for the digitization of public or private documents, so that the digitized documents produce the same legal effects as the original documents.
- 2.13 CONARQ Resolution No. 6, of 05/15/1997 - provides guidelines regarding the outsourcing of public archival services.
- 2.14 CONARQ Resolution No. 23, of 06/16/2006 - provides for the adoption of the Brazilian Dictionary of Archival Terminology by bodies and entities that are part of SINAR.

- 2.15 CONARQ Resolution No. 31, of 04/28/2010 - determines the adoption of Recommendations for the Digitization of Permanent Archival Documents.
- 2.16 CONARQ Resolution No. 37, of 12/19/2012 - approves the Guidelines for the Presumption of Authenticity of Digital Archival Documents.
- 2.17 CONARQ Resolution No. 39, of 04/29/2016 - establishes guidelines for the implementation of reliable digital archival repositories for the archiving and maintenance of digital archival documents in their current, intermediate and permanent phases, of bodies and entities that are part of the National Archival System - SINAR.
- 2.18 CONARQ Resolution No. 40, of 12/09/2014 - determines procedures for the elimination of documents within the bodies and entities that are part of the National Archival System - SINAR.
- 2.19 CONARQ Resolution No. 43, of 09/04/2015 - changes the wording of CONARQ Resolution No. 39, of 04/29/2014, which establishes guidelines for the implementation of reliable digital repositories for the transfer and collection of digital archival documents for archival institutions of bodies and entities that are part of the National Archives System - SINAR.
- 2.20 CONARQ Resolution No. 44, of 02/14/2020 - gives new wording to articles 1, 2 and 3 and respective annexes 1, 2 and 3 of Resolution No. 40, of December 9, 2014.
- 2.21 CONARQ Resolution no. 45, of 02/14/2020 - revokes Resolutions no. 14, of 10/24/2001; no. 21 of 08/04/2004 and no. 35, of 12/11/2012.
- 2.22 Normative Ordinance No. 5, of 12/19/2002, from the Secretariat of Logistics and Information Technology of the Ministry of Planning.
- 2.23 Normative Ordinance No. 110, of 09/03/2004, of the National Electric Energy Agency - ANEEL
- 2.24 BRAZILIAN ASSOCIATION OF TECHNICAL STANDARDS - ABNT ISO/TR 21946:2020: Information and documentation: Assessment for management of archival documents, 2020.
- 2.25 BELLOTO, Heloísa Liberalli. Permanent archives: document treatment, 2004.
- 2.26 NATIONAL ARCHIVAL COUNCIL. Collection of Archival Legislation and related, 2021.
- 2.27 Brazilian Dictionary of Archival Terminology of the National Archives, 2005.
- 2.28 Dictionary of Archival Terminology. São Paulo: Association of Archivists of São Paulo (ARQ-SP), 2012.
- 2.29 Guidelines for the Implementation of Reliable Digital Archival Repositories - RDC-Arq. CONARQ (NATIONAL ARCHIVE COUNCIL)/ CTDE (TECHNICAL CHAMBER OF ELECTRONIC DOCUMENTS), 2015.
- 2.30 E-ARQ Brazil: Requirements Model for Computerized Document Archival Management Systems. CONARQ (NATIONAL ARCHIVE COUNCIL)/ CTDE (TECHNICAL CHAMBER OF ELECTRONIC DOCUMENTS), 2011.
- 2.31 Glossary of Digital Archival Documents of the National Archives Council (CONARQ) and the Technical Chamber of Electronic Documents (CTDE), 2020.

3 Values

3.1 Document integrity and indivisibility

Archival funds must be preserved without dispersal, mutilation, alienation, corruption, unauthorized destruction, or undue action.

3.2 Compliance

Document management practices and methods must be compliant with applicable archival legislation and technical standards.

3.3 Organicity of sets of documents

Organicity is the quality according to which archives mirror the structure, functions and activities of the producing/accumulating entity in its external and internal relationships. Such relationships are reflected in the document sets and ought to be preserved.

3.4 Origin of documents

Archives must be organized in accordance with the competence and activities of the institution legitimately responsible for the production, accumulation or storage of documents. Archives originating from an institution must maintain their individuality, within their organic context of production, and must not be mixed with others of distinct origin.

3.5 Transparency

Document management must ensure that archival documents serve as an instrument for recording and highlighting the acts carried out, enabling adequate publicity of information.

3.6 Uniqueness

Archival documents are distinguished from others because they are unique, that is, depending on the context of their production (place, date, producer, sender, recipient, etc.) they contain unique elements in their constitution, regardless of their form, genre, type or medium.

3.7 Quality assurance of document management

Document management units must seek the continuous improvement of their services, instruments and actions, taking into account: accessibility in terms of quality and ease of access to the information they hold; usability in terms of ease of use; the truthfulness inferred from the completeness and production procedures; reliability pertaining to the moment of production; and, finally, authenticity associated with the degree of reliability of a document from the moment of its production until its final destination.

4 Guidelines

4.1 Life cycle of documents and information

4.1.1 Document management processes and activities in Eletrobras companies must consider the entire life cycle of information, from its production to its permanent storage or elimination.

4.1.2 The controls, indexes, metadata and descriptors, applied due to activities of classifying and describing documents and information, must be maintained during and after their processing ends.

4.1.3 Documents gathered in the form of dossiers or administrative proceedings must have their integrity preserved, in order to guarantee their ability to testify about the administrative act they record.

4.1.4 Requirements, standards, norms and procedures for digital archival repositories, digital and electronic signatures and metadata structures must be established to ensure that digital archival documents remain accessible, understandable, authentic and complete.

4.2 Document management

4.2.1 To ensure/meet the necessities of companies, document management procedures must be established whilst respecting legal and regulatory requirements, in addition to possible historical interests.

4.2.1.1 Document production

Areas must optimize the creation of documents, reducing print production and avoiding the creation of multiple non-essential digital versions.

4.2.1.2 Assessment

Periodic document collection actions must be ensured as prior activity to the analysis and selection of documents in order to establish storage periods in the current and intermediate phases and their final destination, that is, elimination or collection for permanent storage. The application of the evaluation criteria must be carried out in the current phase, in order to distinguish documents of primary value from those of secondary value (see sub-item 6.46 of this policy – Three Ages Theory).

4.2.1.3 Selection, transfer and recall

Documents must be transferred to the intermediate archive and/or recalled to the permanent archive in accordance with the criteria established in the Document Temporality Table.

4.2.1.4 Temporality and destination

Documents must be preserved for a determined period of time, according to the assessment of their primary and/or secondary value (see subitem 6.46 of this policy – Three Ages Theory) as provided for in the Document Temporality Table.

4.2.1.5 Access and dissemination

Awareness-raising actions and methods for easy consultation and access to files must be implemented, in order to promote their dissemination and use.

4.2.1.6 Elimination

The elimination of documents devoid of legal, evidentiary or historical value must be ensured, in line with the TTD adopted by the company and Brazilian archival legislation.

4.2.1.7 Conservation

Acts of conservation must be adopted, ensuring adequate environmental and storage conditions, as well as care concerning the packaging and appropriate use of archives, on any medium, in order to delay the degradation and loss of documents.

4.2.1.8 Preservation

The preservation and storage of documents, on any medium, must be ensured for the continuity of operational activities, for compliance with regulatory, tax or legal requirements, for their use as evidence for audits and legal proceedings and for the preservation of Organizational Memory.

4.3 Conditions for document management

4.3.1 Capacity building

Employees must be continuously trained in the use of archival techniques and computerized systems for controlling, processing and accessing archival documents and other technologies that may be adopted.

4.3.2 Quality

The efficiency and quality of procedures for producing, receiving, processing and archiving documents in the current, intermediate and permanent phases must be ensured, as well as the processes of document evaluation, final disposal (elimination and permanent storage) and auditing.

4.3.3 Information Technology

The appropriate application of information technologies must be ensured, in accordance with archival guidelines, always prioritizing integrated document management between technical, administrative and specialized content documents, in all of their formats.

4.3.4 Standardization, resources and methods for managing archival documents

Eletrobras companies must have unified and internal normative documents, resources and methods for managing archival documents, covering production, receipt, processing, availability, evaluation, arrangement, description, archiving and final disposal.

4.4 Information security

4.4.1 Basic properties

In all procedures and phases of the document life cycle, the basic properties of information security must be assured: confidentiality, integrity, availability and authenticity.

4.4.2 Management of secrecy criteria

The list of information and documents that must have restricted access must be maintained and organized by the team responsible for document management, through a document classification matrix and, if possible, made available to the area responsible for the Citizen Information Service (SIC) for the purpose of standardizing permission or denial of access.

4.4.3 Classification of secrecy based on the Access to Information Law

Archival documents must be classified according to the degree of secrecy (reserved, secret or top secret) only if they contain information considered essential to the

safety of society or the State, whose disclosure or unrestricted access may result in any of the situations set out in the items of art. 23 of Law No. 12,527, of November 18, 2011.

4.4.4 Restricted access based on other legal hypotheses of secrecy

Classification must be applied regarding the restriction of access to documents for which information can be protected based on the secrecy hypotheses set out in tax legislation, banking legislation, laws on operations and services in the capital market, commercial legislation, professional legislation, industrial legislation and judicial secrecy legislation, and to documents with information that refers to scientific or technological research and development projects, in accordance with paragraph 1 of art. 7 of Law No. 12,527, of November 18, 2011.

4.4.5 Reliable repositories

Parameters must be established for reliable digital archival repositories, in order to guarantee authenticity (identity and integrity), confidentiality, availability, access and preservation, taking into account the perspective of the need to maintain document archives for long periods of time or even in perpetuity.

4.5 Risks

4.5.1 The methods, regulations and procedures adopted must consider the risks inherent to each document management phase, from production to final disposal, in order to prevent or minimize negative impacts on companies.

5 RESPONSIBILITIES

5.1 Eletrobras Board of Directors - approving this policy.

5.2 Eletrobras Executive Board of Directors – approving this policy and ensuring its implementation.

5.3 Eletrobras Companies Board of Directors – approving this policy.

5.4 Eletrobras Companies Executive Board of Directors - approving this policy and guaranteeing its implementation, ensuring compliance with its values in all decisions.

5.5 Management Board and Sustainability Department or equivalent - supporting the Document Management areas of companies, providing the necessary resources to comply with archival management procedures.

5.6 Eletrobras Companies Boards - appointing the members of the Permanent Document Assessment Committee (CPAD) relevant to their area of activity and the representatives of their company to the Documentation and Information Management Committee of Eletrobras Companies (COGEDI).

5.7 Permanent Document Assessment Committee (CPAD) - supporting document management actions, with the goal of guiding and carrying out the process of analysis, evaluation and selection of documents produced and accumulated within its scope of action to guarantee their final destination.

5.8 Document Management Areas - coordinating document management, preparing regulations and related guidelines and technically supporting the areas in their fulfillment.

5.9 Documentation and Information Management Committee of Eletrobras Companies (COGEDI) - acting as a support body for the Executive Boards of their respective Companies, regarding the management of documents and information, through representatives from the companies' documentation areas.

5.10 Organizational Units - acting in accordance with the values and guidelines of this policy, managing the documents and information under their responsibility and classifying confidential documents according to the degree of secrecy or access restrictions.

6 Concepts

6.1 Collection - set of documents from a producing entity or a custodian entity.

6.2 Archiving - sequence of operations for the orderly storage of documents.

6.3 Archive - (a) set of documents produced and received by public bodies, public institutions and private entities, as a result of the carrying out of specific activities, as well as by individuals, whatever the medium of information or the nature of the documents/ (b) facilities where documents are stored.

6.4 Central archive - unit responsible for the technical guidelines and procedures applied to the company's archives, to where documents from the various sectors of the institution are transferred, after the current archive phase has passed, seeking to ensure the maintenance of documents during the deadlines established in the document temporality table, also referred to as general archive.

6.5 Current archive - an archive with informational content that has administrative, legal, technical and/or scientific value, being maintained and used by the different areas of the company, observing the deadlines established in the Document Temporality Table (TTD).

6.6 Intermediate archive - an archive that brings together documents originating from current files, with low frequency of use and which must be preserved for its informational content and awaiting final destination.

6.7 Permanent archive - archive of historical, evidentiary/legal value that must be permanently preserved.

6.8 Sector archive - location where the archive of a sector or administration service is stored. It is a decentralized unit and must be technically subordinate to the Central Archive.

6.9 Technical archive - file with a predominance of documents arising from the exercise of an institution's core activities.

6.10 Digital Signature - type of electronic signature, the result of a mathematical operation, which uses encryption algorithms and allows the origin and integrity of the document to be safely assessed. The attributes of the digital signature are: a) being unique for each document, even if the signing party is the same; b) proving the authorship of the digital document; c) enabling verification of integrity; d) ensuring the "non-disavowal" of the digital document for the recipient, since, in principle, the issuer is the only person who has access to the private key that generated the signature.

6.11 Electronic Signature - generation, by computer, of any symbol or series of

symbols executed, adopted or authorized by an individual to be the legally equivalent bond to the individual's hand signature.

6.12 Authenticity - credibility of a document as a document, that is, the quality of a document being what it claims to be and being free from adulteration or any other type of corruption. Authenticity is made up of identity and integrity.

6.13 Assessment - process of analysis and selection of documents, aiming to establish in TTD the storage periods in the current and intermediate phases and their final disposal, that is, the elimination or collection for permanent storage, according to the values assigned to them.

6.14 Document life cycle - successive phases that documents in an archive undergo (current, intermediate and permanent), from their production to permanent storage or elimination (see sub-item 6.46 of this policy – Three Ages Theory).

6.15 Archival classification of documents - organization of documents in an archive, according to a classification plan; sequence of operations that, according to the different structures, functions and activities of the production area, seek to distribute the documents in an archive in a hierarchical structure of classes, subclasses, groups and subgroups.

6.16 Classification of documents regarding restriction of access - definition of the level of sensitivity of the information, in order to ensure that it receives an adequate level of protection, according to its value, legal requirements, sensitivity and criticality for Eletrobras companies. This restriction may be based on other legal hypotheses of confidentiality other than Law No. 12,527, of November 18, 2011.

6.17 Classification of documents according to the degree of secrecy of the information - identification and formalization of the document that contains information classified by degree of secrecy, in accordance with the guidelines of Law No. 12,527, of November 18, 2011, whose content disclosure may jeopardize the safety of society or the State and for which public access will be temporarily restricted.

6.18 Permanent Document Assessment Commission (CPAD) - commission responsible for guiding and carrying out the process of analysis, evaluation and selection of documentation produced and accumulated within the areas with a view to identifying documents for permanent storage and eliminating those that are worthless. Responsible for the company's Document Temporality Table (TTD).

6.19 Reliability - credibility of an archival document as a statement of fact. It exists when an archival document can support the fact to which it refers, and is established by examining the completeness, the form of the document and the degree of control employed in the process of its production.

6.20 Confidentiality - property that limits access to information only to the entities authorized by the owner of the information.

6.21 Conservation - set of stabilizing actions that are meant to slow down the degradation process of documents or objects, through environmental control and specific treatments, regardless of the medium, enabling future access.

6.22 Archival Description - set of procedures that, based on formal and content elements, allow for the identification of documents and the development of research instruments, seeking to recover information contained in archival collections.

6.23 Destination - decision, based on the assessment, regarding the routing of

documents for collection (permanent storage), disposal or elimination.

6.24 Digitization - process of converting a document to digital format, using an appropriate device.

6.25 Availability - property that guarantees that the information is always available for use by users authorized by the owner of the information.

6.26 Archival document - recorded information, regardless of form or support, produced or received in the course of the activities of an institution or person, endowed with organicity, which has sufficient constituent elements to serve as proof of these activities.

6.27 Digital document - recorded information, encoded in binary digits, accessible and interpretable through a computer system. For example: Excel spreadsheets, MP3 music, video in AVI format, etc.

6.28 Electronic document - recorded information, encoded in analog form or in binary digits, accessible and interpretable through electronic equipment. For example: VHS movies, music on cassette tapes, etc.

6.29 Confidential document - document, regardless of format (electronic or not), produced and/or received by Eletrobras companies in the exercise of their activities, which contains information considered essential to the security of society or the State and for which disclosure or unrestricted access may result in any of the situations set out in the items of art. 23 of Law No. 12,527, of November 18, 2011, or with information covered by other legal secrecy hypotheses, as set out in art. 22 of the aforementioned law.

6.30 Dossier - document unit in which documents of a different nature pertinent to a specific subject or person are brought together, meant for a specific purpose.

6.31 Elimination - destruction without the possibility of reconstruction of documents devoid of value for permanent storage, in accordance with the period established in TTD.

6.32 Archival fund - set of documents from the same source.

6.33 Document management - set of procedures and technical operations regarding the production, processing, use, evaluation, and archiving of documents generated or received in the current or intermediate phase, with a view to their elimination or collection for permanent storage.

6.34 Identity - set of attributes of an archival document that characterize it as unique and differentiate it from other archival documents.

6.35 Integrity - state of documents that are complete and have not suffered any type of corruption or unauthorized or documented alteration.

6.36 Metadata - structured data that describes and allows one to find, manage, understand and/or preserve archival documents over time.

6.37 Classification plan - scheme for the hierarchical distribution of documents into classes, according to specific archiving methods, drawn up based on a study of the structures, functions and activities of an institution and analysis of the archive (see sub-item 6.3, (a) of present policy) it produces.

6.38 Preservation - set of administrative, political and operational measures and strategies that ensure the integrity of documents, protecting them from

deterioration agents and the acts of time.

6.39 Digital preservation - set of managerial and technical actions required to overcome technological changes and the fragility of media, ensuring access and interpretation of digital documents for as long as necessary.

6.40 Administrative process - unit for archiving administrative acts documented in a single process with a standardized and previously defined organization, which substantiate an administrative decision related to issues such as financial account control, functional conduct evaluation, irregular or illegal situation investigations, execution of contractual instruments, administrative act or conduct review, granting of a certain right or individual situation.

6.41 Recalling- transfer of documents from the intermediate archive to the permanent archive.

6.42 Digital archival repository - computerized solution for managing archival documents, whether in the current and intermediate phases, or in the permanent phase, formed by hardware, software and metadata elements, as well as an organizational infrastructure and normative and technical procedures that guarantee the maintenance of authenticity, preservation and access to documents.

6.43 Selection - separation of documents of permanent value from those subject to elimination, by means of criteria and techniques previously established in a temporality table.

6.44 Computerized Document Archival Management System (SIGAD) - set of procedures and technical operations supported by computerized systems that aim to control the life cycle of documents, from production or capture to final destination, following the values of archival management and enabling access and medium-term preservation of reliable and authentic digital and non-digital archival documents. It is applicable in hybrid systems, i.e. those that use digital documents and conventional documents.

6.45 Document Temporality Table (TTD) - allocation instrument, approved by competent authority, which sets the deadlines within which documents must be kept in the current and intermediate archives, or recalled to the permanent archive, determining microfilming and/or digitization and/or deletion.

6.46 Three Ages Theory - theory according to which archives are considered current, intermediate or permanent archives, according to the frequency of use by their producing entities and the identification of their primary and secondary values (see subitem 6.14 of this policy – Document Life Cycle).

6.47 Transfer - transfer of documents from the current to the intermediary archive.

6.48 Archival Unit - document considered for classification, arrangement, storage and notation purposes. An archival unit can be a dossier, process or folder in which documents are collected under the same classification code.

6.49 Primary value - value attributed to a document depending on the interest it may have for the producing entity, taking into account its usefulness for administrative, legal and tax purposes.

6.50 Probative value - intrinsic value of an archival document that allows it to serve as legal evidence.

6.51 Secondary value - value attributed to a document depending on the interest it may have for the producing entity and other users, taking into account its usefulness for purposes other than those for which it was originally produced.

7 General Provisions

7.1 This policy can be deployed in regulations that are unified and valid for all Eletrobras companies, and also in specific internal normative documents in each Eletrobras company, always aligned with the values and guidelines established herein.

7.2 Eletrobras companies must adapt their normative documents and the controls that are necessary in line with the provisions of this policy, within a maximum period of 180 days, from the approval by the Eletrobras Board of Directors.

7.3 Replaces version 2.0 of the POL-13 policy, approved by DEL-259/2017, of 12/15/2017, and adopts the new coding of POL-Doc Corporate Inf, according to the normative document coding appendix of the Standardization System standard Corporate – NO-DCGC-01, edition 1.0, approved by RES-553/2021, of 08/30/2021.