



CORPORATE STANDARD PROCEDURE

OC 100 REV. 6/80

SUBJECT

APPROVED BY

J. F. Dembeck

J. M. Gaffney

E. P. Lyons

MARKED SECTION REVISED

CSP 30

EFFECTIVE DATE

October 1, 1984

SUPERSEDES

July 1, 1983

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RECORDS MANAGEMENT

OBJECTIVES

- To ensure efficient storage, protection and retrieval of records essential to the conduct of Olin's business, as well as prompt, planned destruction of all unneeded records.
- To comply with Federal, state and local laws and regulations by retaining those records Olin is required to keep, and ensuring their prompt destruction when permitted by such laws and regulations.
- To require identification, protection and availability of records deemed essential to the continuation of Olin's operations in the event of disaster.

GENERAL INFORMATION

Policy

1. It is Olin Policy (see Policy 1.5) to retain files and records only as long as they are essential to the conduct of its business and necessary to protect its legal rights, support its tax reports, provide documentation for audit requirements and ensure compliance with legal requirements.
2. The executive officer of each foreign subsidiary is responsible for developing, coordinating and monitoring records management and vital records protection programs at their locations. To accomplish this, the executive officer will use this procedure as a guide and must ensure that the programs will comply with local laws and regulations.

Definitions

1. A *record*, for the purpose of this procedure, is defined as any document or copy of a document created within Olin or received by Olin from others as a result of conducting Olin's day-to-day business which is kept because it meets one or more of the criteria described below under Retaining Records. It includes, but is not limited to, letters, memos, written and printed reports, data recorded by EDP on magnetic tapes, disk packs, punched cards, microfilm, sound recordings, charts prepared by manufacturing control devices, engineering drawings, etc.
2. A *nonrecord*, for the purpose of this procedure, includes library materials (i.e., books, periodicals, manuscripts, pamphlets, brochures and other items available to the general public), reference sources, information bulletins, telephone books, etc. Nonrecords are not to be included on retention schedules.
3. *Records officer*, as used herein, is the designation given an employee, regardless of actual title, who is assigned responsibility for providing guidance in maintaining an effective records management program, and for ensuring that the program operates in accordance with this procedure.

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Records Officers (Continued)

2. The Group records officer, appointed by the Group President or his designee, is responsible for providing assistance to each location records officer, for securing necessary Group law and Corporate tax department reviews and approvals and for monitoring compliance with Olin's records management program at all Group locations. The Group records officer is also responsible for the selection of all Group off-site storage facilities and all on-site storage facilities for Group headquarters locations. The establishment of off-site commercial locations is to be coordinated with the Manager, Records Management in Stamford.
3. Location records officers are responsible for providing assistance and training, as required, to location department managers, for selecting on-site storage facilities and for monitoring departmental compliance with Olin's records management program. The Group records officer must perform this function for smaller locations where a records officer has not been appointed.

Retention Guidelines

1. To assist operating unit personnel and records officers in implementing Olin's records management program, the Manager, Records Management will provide records retention guidelines detailing the common terminology used to describe Olin records and the maximum retention period for each record. For those Olin records retained to satisfy legal requirements, the maximum retention period listed in the guidelines will be the required retention period based on specific laws or regulations. If a department wishes to retain a record for a longer period, written justification must be attached to the retention schedule or the records retention revision form when submitting for approvals.
2. While the guidelines will list the maximum retention period, department managers may specify a shorter retention period for any record, except those retained to comply with governmental laws and/or regulations.
3. Records used in the day-to-day administration of a department and kept for a period of one year or less beyond the current year need not be listed individually on a retention schedule. These records may be categorized as Administrative Files on the retention schedule and may include, but are not limited to, such records as correspondence, departmental budgets and highlights. These records are not considered important to the long-term functioning of the company. If a department elects to keep a record beyond CY+1, it must be identified on the retention schedule.
4. Any record with a governmental security classification must be handled and retained in accordance with "Corporate Security Manual - Safeguarding Department of Defense Classified Information." (The Director, Corporate Security in Stamford may be contacted for additional information.)

Law Department

1. The Corporate law department is responsible for approving the maximum retention periods in the records retention guidelines.
2. The Group Counsel (Director, Corporate Law Department for Corporate) is responsible for:
 - a. Approving all records retention schedules.
 - b. Informing applicable records officers of any legal hold placed on records (e.g., because of lawsuits) and of any provisions in contracts or agreements relating to retention of the records of acquired or disposed of operations.

Corporate Tax Department

1. The Director, Taxes is responsible for reviewing all retention schedules to indicate those records required to support Olin's tax returns.

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Preparation, Review and Approval of Records Retention Schedules (Continued)

3. Completed retention schedules will be incorporated into the records management control system at Stamford by the Manager, Records Management. Copies of approved retention schedules will be sent to Group records officers for distribution to location records officers and appropriate department managers.

Updating Retention Schedules

1. Each department manager is responsible for reviewing his/her retention schedules annually for any additions, deletions or other needed changes. Annually (during the first quarter) the Group and location records officers will confirm that such reviews have been made.
2. Form OC 943, Records Retention Revision (Exhibit C), is to be used for all retention schedule revisions. The form is to be prepared, reviewed and approved in the same manner as the Records Retention Schedule.
3. Periodically, as deemed necessary, the Manager, Records Management, working with Group records officers, will require the preparation of new retention schedules for operating units or departments.

Transfer of Records

1. As necessary, semiactive and inactive records are to be transferred to a location or off-site storage center. Records referenced no more than annually should be transferred to storage immediately to free up valuable office space. All records transfers are to be coordinated with the location records officer who will provide all necessary instructions for handling.
2. When an off-site commercial center is to be established for records storage, the Manager, Records Management in Stamford is to be notified.
3. The physical transfer of records from departmental files must be documented. A Records Transfer form, OC 194 (Exhibit D), is available for this purpose. However, when a commercial storage center is used, it may be necessary to design a specialized form to fit the center's system.
4. Department personnel transferring records must prepare the transfer document from information contained on the records retention schedule. Records transferred must be properly identified to enable any necessary retrieval and timely destruction in accordance with the applicable retention schedule.

Destruction of Records

1. Records for which retention periods have expired are to be destroyed as soon as possible (but not later than March 31) in the year following the final year that the records were to be retained *except as follows*:
 - a. Records needed to support Olin's tax return for all open tax years, or to support any specific open tax items, must be retained. Each yearend the Manager, Records Management will confirm (see page 4, paragraph 2 under Corporate Tax Department) to Group records officers all open tax years and any tax years having open tax items. In turn, Group/location records officers will inform all department managers that records scheduled for destruction related to closed tax years may be destroyed. The Group records officer will then submit to the Director of Taxes a listing of any records scheduled for destruction which relate to a tax year having open tax items. This will permit approval for destruction of those records not needed to support the open tax items.

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Protection Guidelines (Continued)

3. For the most part, vital records will be protected for extended periods of time, but there will also be cases (such as certain financial records) where it will be necessary to replace the protected records with current data on a frequent basis.
4. For additional information, see Guidelines for Vital Records Identification and Protection (Exhibit F).

Protection Methods

1. **Natural Dispersal** – In the normal course of business, Olin will generate and distribute vital information to other Company locations or to outside entities. So long as these vital records are maintained at those locations for the period that the information is vital, no additional protective measures are necessary.
2. **Another Olin Location** – Adequate protection of certain records can be achieved by shipping them to another Olin location (with the original or a copy remaining on-site) to be stored as long as the record is vital. This is similar to the natural dispersal method in preceding paragraph 1.
3. **Vaulting** – Adequate protection of vital records originals against loss can be achieved by storing them on-site in fireproof vaults.
4. **Commercial Records Centers** – Off-site commercial locations can be used for safe storage of vital records not otherwise protected.

Preparation and Approval of Vital Records Protection Schedules

1. At the time a Records Retention Schedule, form OC 192 (or a Records Retention Revision, form OC 943) is prepared, determination of those records considered vital is made and is indicated on the form. (See Preparation, Review and Approval of Records Retention Schedules beginning on page 4).
2. Location records officers are to initiate preparation of a Vital Records Protection Schedule, form OC 183 (Exhibit E), based on information included on the final approved records retention schedule. all items marked as vital must be included.
3. For each vital record, the location records officer, together with the department manager, must determine:
 - a. Method of protection, i.e., dispersal, vaulting, shipment to another Olin location or to a commercial records center.
 - b. Frequency of transfer to protected storage, e.g., weekly, monthly, when superseded.
 - c. Protection period.
4. Vital records protection schedules must be approved by the department manager, both the location and Group records officer and the Manager, Records Management. The Group records officer is responsible for ensuring that all vital records protection schedules are properly approved at the Group level and submitted to the Manager, Records Management in Stamford for Corporate approval.
5. After the Manager, Records Management approves the schedules, they will be returned to the Group records officer for distribution. Copies of approved vital records schedules will be maintained in a central file in Stamford where they will be available in event of local disaster and for periodic audit of the system.

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EXHIBITS INCLUDED

Exhibit A – Records Inventory Worksheet, OC 191.

Exhibit B – Records Retention Schedule, OC 192.

Exhibit C – Records Retention Revision, OC 943.

| Exhibit D – Records Transfer, OC 194.

Exhibit E – Vital Records Protection Schedule, OC 183.

Exhibit F – Guidelines for Vital Records Identification and Protection.

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EXHIBIT A
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Olin

RECORDS INVENTORY WORKSHEET *(Instructions on Reverse Side)*

GROUP (1)		DEPARTMENT (1)		SECTION (1)		LOCATION (1)		
RECORD TITLE/SERIES (2)						FORM NUMBER (3)		
DESCRIPTION (4)								
FILE LOCATION (5)			FILE ARRANGEMENT (5)			FILE TYPE (5)		
☐ OFFICE AREA ☐ STORAGE AREA ☐ VAULT			☐ ALPHABETICAL ☐ NUMERICAL ☐ CHRONOLOGICAL			COMPUTER GENERATED ☐ PAPER NON COMPUTER. ☐ MICROFILM ☐ PAPER ☐ MICROFILM		
(6) YEAR*	(7) VOLUME		(8) RATE OF REFERENCE (CHECK ONE)					(9) ACTION (Destroyed after inventory?)
	NO OF DRAWERS	NO OF INCHES	DAILY	WEEKLY	MONTHLY	ANNUALLY	LESS FREQ THAN 1 YR	
*EACH YEAR SHOULD BE LISTED SEPARATELY			PREPARED BY (10)				DATE (10)	
TO BE COMPLETED BY DEPARTMENT MANAGER (11)								
IS THIS RECORD SUBJECT TO RETENTION BECAUSE OF A STATUTORY REQUIREMENT (OTHER THAN TO SUPPORT OLIN'S TAX RETURN)?		DOES THIS RECORD GROUP OR ANY PART OF IT HAVE A U S GOVERNMENT SECURITY CLASSIFICATION?		SHOULD THIS RECORD BE CLASSIFIED AS VITAL?		IS THIS THE RECORD COPY?		
☐ YES - Enter Statutory Retention Period _____ ☐ NO		☐ YES ☐ NO		☐ YES ☐ NO		☐ YES ☐ NO - Enter Location (Dept) of Record Copy		
RECOMMENDED RETENTION PERIOD (Based on Usage)			SIGNATURE			DATE		
OFFICE	RECORD CTR	DESTRUCTION						

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USE ONLY

OC 105

OC-192 REV. 7/84

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RECORDS RETENTION SCHEDULE (Instructions on Reverse Side)

LEAVE BLANK

EFFECTIVE DATE (2)

SCHEDULE NUMBER (2)

GROUP (3)

DEPARTMENT (3)

SECTION (3)

LOCATION (3)

(4)
RECORD
NO

(5)

RECORD TITLE/SERIES

RETENTION

(6)
Code(7)
Office(7)
Center(7)
Destroy

REVIEW

(8)
Dept(9)
Tax(10)
Corp
Rec(11)
Govt
Reg

OFFICE RESPONSIBLE FOR RECORD COPY (12)

If Other Than This Office)

(GROUP, DEPARTMENT, SECTION, LOCATION)

COMMENTS (13)

STANDARD
(14)

DEPARTMENT MANAGER

DATE

LOCATION RECORDS OFFICER

DATE

GROUP RECORDS OFFICER

DATE

GROUP COUNSEL

DATE

CORPORATE TAX DEPARTMENT

DATE

MANAGER, RECORDS MANAGEMENT

DATE

Forms May Be Obtained from Stamford Stockroom
Actual Size 8 1/2" X 11"

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OC 105

OC 943 REV 6/83

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RECORDS RETENTION REVISION (Instructions on Reverse Side)

LEAVE BLANK

EFFECTIVE DATE (12)

SCHEDULE NUMBER (2)

GROUP (1)

DEPARTMENT (3)

SECTION (3)

LOCATION (3)

ACTION REQUIRED (1) (4)

(5)
RECORD
NO

(6)

RECORD TITLE/SERIES

RETENTION

REVIEW

(11) (12)

OFFICE RESPONSIBLE FOR RECORD COPY (13)

(If Other Than This Office)

(GROUP, DEPARTMENT, SECTION, LOCATION)

ADD

DELETE

REVISE

(Exactly as appears on Records Retention Schedule)

(17)
Code

(18)
Office

(19)
Center

(20)
Destroy

Year

10%

Year

Rec

Govt

Proc

COMMENTS (14)

APPROVALS
(15)

DEPARTMENT MANAGER

DATE

LOCATION RECORDS OFFICER

DATE

GROUP RECORDS OFFICER

DATE

GROUP COUNSEL

DATE

CORPORATE TAX DEPARTMENT

DATE

MANAGER, RECORDS MANAGEMENT

DATE

Forms May Be Obtained from Stamford Stockroom
Actual Size 8 1/2" X 11"

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EXHIBIT D

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OC 194 REV 9/84

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Olin RECORDS TRANSFER

NOTE: Coordinate all transfers with local records officer who will furnish any necessary completion and handling instructions

SCHEDULE NUMBER

GROUP

DEPARTMENT

SECTION

LOCATION

TEMP BOX NO	RECORD NO.	RECORD TITLE/SERIES (EXACTLY AS APPEARS ON RECORDS RETENTION SCHEDULE)	ADDITIONAL DESCRIPTION (RANGE ALPHA/NUMERICAL)	RECORD DATES		REC. OFFICER/CENTER TO COMPLETE		
				FROM	TO	H C BOX NUMBER	DESTROY DATE	REVIEW CODE
PREPARED BY		DATE	APPROVED BY RECORDS OFFICER				DATE	

*Actual Size 8 1/4" X 11"
Forms May Be Obtained from Stamford Stockroom*

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OC-183 (Back) REV. 6/83

INSTRUCTIONS. Instruction numbers refer to like-numbered areas on the form

1. *From approved Records Retention Schedule, enter Vital Records Schedule Number (Records Retention Schedule No. with the prefix).*
2. *Enter in appropriate block Group, Department, Section and Location.*
3. *Enter Record Number from Records Retention Schedule. Record Number refers to the sequential number assigned when the Records Retention Schedule was prepared. Where a code number has been assigned to the record type (e.g., Stamford), enter the record code number.*
4. *Enter Record Title or Series Name exactly as it appears on Records Retention Schedule.*
5. *Enter number of years from Destroy column of Records Retention Schedule.*
6. *Enter appropriate protection retention period for each Record Title or Series Name. This will usually be less than the retention period indicated on the Records Retention Schedule.*
7. *Enter protection method - check (✓) if record is protected by storage in On-Site Vault. If shipped Off-Site, enter name and location of off-site storage facility.*
8. *Enter frequency of transfer to protected storage. e.g., weekly, monthly, when superseded, etc.*
9. *Check (✓) appropriate column to indicate if record is the only copy.*
10. *All approval blanks are to be signed and dated.*
11. *Manager, Records Management is to enter Effective Date as of date of final approval, retain one copy and return the Schedule to the Group records officer for distribution to department manager, location records officer and appropriate records center (where applicable).*



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EXHIBIT F
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2. Records containing information essential in reconstructing Olin's financial position. Generally, this means protection of records which will enable Olin to reconstruct its balance sheet position as it existed prior to the disaster. This will require protection of records relating to assets and liabilities.
3. Legal or original Corporate documents such as deeds, leases, board meeting and shareholders meeting minutes, records of incorporation, stockholder records, etc.
4. Documents detailing stockholders' and employees' rights and obligations.

B. HOW TO PROTECT VITAL RECORDS

There are basically three methods of protection:

1. Existing dispersal of copies of the vital records, either within or outside the organization. In the normal course of business, Olin will generate and distribute vital information to its various locations for use and reference. For example, vital financial and operating statements may be distributed to several plant locations as well as Group and Corporate headquarters. So long as these records are maintained at two or more different locations for the period of time during which the information they contain is vital, additional protection measures should not be necessary if it is formally known who is responsible for the records and how to retrieve them in the event of a disaster.
2. On-site storage in vaults or safes. There is potential danger, however, in storing microfilm in insulated file cabinets, safes or vaults constructed with a crystalline insulating material that generates interior steam when heated by fire. If microfilm is stored in equipment in which interior steam is circulating, it is possible that the steam will enter the microfilm containers and soften and separate the thin emulsion from the cellulose acetate microfilm base, thus destroying the records.

Because of this possibility, it is desirable to prepare a duplicate roll of any vital records in microfilm format. This duplicate copy should be sent to a vital records center for protection.

3. Shipment to a Vital Records Center
 - a. Originals - If original records containing vital information are used infrequently, the possibility of sending the original records to a vital records center should be considered.
 - b. Duplicates - When the above condition does not exist, it will be necessary to prepare a duplicate copy of the vital records. Any process may be used for duplication - microfilm, magnetic tape, photocopy, etc.

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SUBJECT

APPROVED BY

J.F. Dembeck
J.M. Gaffney
E.P. Lyons

PROCEDURE NO.

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RECORDS MANAGEMENT

OBJECTIVES

- To ensure efficient storage, protection and retrieval of records essential to the conduct of Olin's business, as well as prompt, planned destruction of all unneeded records.
- To comply with Federal, state and local laws and regulations by retaining those records Olin is required to keep, and ensuring their prompt destruction when permitted by such laws and regulations.
- To require identification, protection and availability of records deemed essential to the continuation of Olin's operations in the event of disaster.

GENERAL INFORMATION

Policy

1. It is Olin Policy (see Policy 1.5) to retain files and records only as long as they are essential to the conduct of its business and necessary to protect its legal rights, support its tax reports, provide documentation for audit requirements and ensure compliance with statutory requirements.
2. The executive officer of each foreign subsidiary is responsible for developing, coordinating and monitoring records management and vital records protection programs at their locations. To accomplish this the executive officer will use this procedure as a guide and must ensure that the programs will comply with local laws and regulations.

Definition

1. A *record*, for the purpose of this procedure, is defined as any document created within Olin or received by Olin from others as a result of conducting Olin's day-to-day business. It includes, but is not limited to, letters, memos, handwritten notes, written and printed reports, data recorded by EDP on magnetic tapes, disk packs, and punched cards, microfilm, sound recordings, charts prepared by manufacturing control devices, engineering drawings, etc.
2. *Records officer*, as used herein, is the designation given an employee, regardless of actual title, who is assigned responsibility for providing guidance in maintaining an effective records management program, and for ensuring that the program operates in accordance with this procedure.

Retaining Records

1. Olin retains records for the following four general purposes:
 - a. *To support its business activities.* These records may be created by Olin itself or received from others. The retention time for such records is determined by management but statutes and regulatory agency requirements may require retention for a period longer than that required for business purposes.

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Retaining Records (Continued)

- b. *To comply with statutory requirements.* These are records which Olin is required by Federal, state or local laws and regulations to keep for specific periods of time and to make available for inspection by government agents. These may be records prepared by Olin in the normal course of business or may be reports and records created specifically to comply with some law or regulation.
 - c. *To protect its legal rights and defenses.* These are records needed as evidence of the Company's corporate existence, its right to conduct its business (such as permits and licenses), its ownership of tangible and intangible property and its claims against others, and as evidence of its defenses against claims.
 - d. *To reestablish normal operations after a disaster.* These are records needed to reestablish normal operations or financial positions if the records of a business or activity are destroyed in a disaster, and are referred to herein as *Vital Records*.
2. It is recognized that a specific record may be retained for more than one purpose. For example, a supplier's invoices are required by law to support Olin's tax return and to support Olin's disbursements.

MANAGEMENT OF RECORDS

Department Managers

1. The department manager has the prime responsibility for proper maintenance of records and up-to-date retention schedules of those records within his or her area of operations in accordance with Olin's uniform records management program.
2. The department manager must make sure that records located in the department or under his or her control are destroyed promptly in compliance with approved records retention schedules as outlined under Destruction of Records on page 5.
3. The foregoing applies to department managers in all line and staff functions including, but not limited to, general management, accounting, manufacturing, engineering, research, development, advertising, marketing, purchasing, human resources, legal, distribution, etc.

Records Officers

1. The Manager, Records Management, appointed by the Corporate Treasurer, is responsible for maintaining a uniform records management program throughout Olin and for providing training and guidance as required to Group and location records officers. This responsibility includes developing and maintaining uniform records retention guidelines, and obtaining law department approval of retention periods in the guidelines, approving records retention schedules and monitoring compliance with Olin's records management program.
2. The Group records officer, appointed by the Group President or his designee, is responsible for providing assistance to each location records officer, for selecting off-site storage facilities, for securing necessary Group law and Corporate tax department reviews and approvals and for monitoring compliance with Olin's records management program at all Group locations.
3. Location records officers are responsible for providing assistance and training, as required, to location department managers, selecting on-site storage facilities and for monitoring departmental compliance with Olin's records management program. The Group records officer must perform this function for smaller locations where a records officer has not been appointed.

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Retention Guidelines

1. To assist operating unit personnel and records officers in implementing Olin's records management program, the Manager, Records Management will provide records retention guidelines detailing the common terminology used to describe Olin records and the maximum retention period for each record. For those Olin records retained to satisfy statutory requirements, the maximum retention period listed in the guidelines will be the required retention period based on specific laws or regulations. If a department wishes to retain a record for a longer period, written justification must be attached to the retention schedule or the records retention revision form when submitting for approvals.
2. While the guidelines will list the maximum retention period, department managers may specify a shorter retention period for any record, except those records retained to comply with governmental laws and/or regulations.
3. Any record with a governmental security classification must be handled and retained in accordance with "Corporate Security Manual - Safeguarding Department of Defense Classified Information."

Law Department

1. The Corporate law department is responsible for approving the maximum retention periods contained in the records retention guidelines.
2. The Group counsel (Director, Corporate Law Department for Corporate) is responsible for:
 - a. Approving all records retention schedules.
 - b. Informing applicable records officers of any hold placed on records because of lawsuits and of any provisions in contracts or agreements relating to retention of the records of acquired or disposed of operations.

Corporate Tax Department

1. The Director, Taxes is responsible for reviewing all retention schedules to indicate those records required to support Olin's tax returns.
2. The Director, Taxes will promptly inform the Manager, Records Management in Stamford of closed tax years and of any hold placed on specific records. In turn, the Manager, Records Management will inform appropriate Group records officers of all closed tax years and of any hold information.

Physical Inventory of Records

1. When it is necessary to take a physical inventory of records, department personnel will be responsible for taking their own inventory. The location records officer will provide assistance (including training) to complete the inventory requirements.
2. The physical inventory will be taken by departmental personnel using the Records Inventory Worksheet, OC 191 (Exhibit A). Instructions for preparation are included on the reverse side of the form. Vital records determination for records listed on each worksheet will be in accordance with the Vital Records Protection section of this procedure and guidelines set forth in Exhibit F.

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Physical Inventory of Records (Continued)

3. Upon completion, the Records Inventory Worksheet will be used in preparing the Records Retention Schedule.

Preparation, Review and Approval of Records Retention Schedules

1. Based on individual location procedures, the Records Retention Schedule, OC 192 (Exhibit B), may be prepared by *either* the location records officer or by department personnel (with records officer assistance) in accordance with the following guidelines:
 - a. Enter records by specific title in accordance with records retention guidelines terminology. Like kinds of records need be listed only once. For example, there should be a listing for location bank statements rather than a separate listing for each bank the location has accounts with.
 - b. List separately, by individual title, reports and records which Olin is required to keep for some specific period to comply with laws and/or regulations. This would include all reports and records on the "authorized list" as called for by CSP 51, Reports and Records Required by Governmental Agencies.
 - c. Indicate in the appropriate column if the record is vital. Also, enter the statutory retention period for those records retained for some statutory requirement other than to support Olin's tax return. (Records supporting Olin's tax return will be designated by the Corporate tax department at the time of their review as indicated in the following paragraph 2.)
 - d. Enter retention period on the schedule. Normally this will be the period Olin must retain a record for its business purposes as shown in the records retention guidelines furnished by the Manager, Records Management. However, for records having a statutory retention period, make sure the period entered is not less than the legal requirement.
2. Each records retention schedule must be reviewed and approved by the department manager, both the location and Group records officer, the appropriate law department and the Manager, Records Management. The Group records officer is responsible for ensuring that schedules are properly approved at the Group level. After Group approval, all retention schedules will be sent to the Manager, Records Management at Stamford who will submit them to the Corporate tax department for review and determination of those records required to support Olin's tax return.
3. Completed retention schedules will be incorporated into the records management control system at Stamford by the Manager, Records Management. Copies of approved retention schedules will be sent to Group records officers for distribution to location records officers and appropriate department managers.

Updating Retention Schedules

1. Each department manager is to reevaluate retention schedules annually for any additions, deletions or other needed changes. The Group and location records officers are responsible for ensuring that such annual reviews are made.
2. Form OC 943, Records Retention Revision (Exhibit C), is to be used for all retention schedule revisions. The form is to be prepared, reviewed and approved in the same manner as the Records Retention Schedule.
3. Periodically, as deemed necessary, the Manager, Records Management, working with Group records officers will require the preparation of new retention schedules for operating units or departments.

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Transfer of Records

1. As necessary, semiactive and inactive records are to be transferred to a location or off-site storage center. Records referenced no more than annually should be transferred to storage immediately to free up valuable office space.
2. Whenever an off-site *commercial* center is to be established for records storage, the Manager, Records Management in Stamford is to be notified.
3. The physical transfer of records from departmental files must be documented. A Records Transfer form, OC 194 (See Exhibit D), is available for this purpose. However, when a commercial storage center is used it may be necessary to design a specialized form to fit the center's system.
4. Department personnel transferring records must prepare the transfer document from information contained on the records retention schedule. Records transferred must be properly identified to enable any necessary retrieval and timely destruction in accordance with the applicable retention schedule.
5. Records transfers are to be coordinated with the location records officer who will provide all necessary instructions for handling.

Destruction of Records

1. Records for which retention periods have expired are to be destroyed as soon as possible (but not later than March 31) in the year following the final year that the records were to be retained *except as follows*:
 - a. Prior to destroying any records that support Olin's tax returns (see paragraph 2 below), confirmation must be obtained from the Director, Taxes that the years to which the records relate have been cleared by tax authorities and that there are no open items. To obtain such confirmation, the Group records officer will submit a list of records scheduled for destruction to the Director, Taxes.
 - b. The Group records officer will submit a list of all records scheduled for destruction to the appropriate Group or Corporate Counsel for approval. This will assure that a legal hold has not been placed on those records scheduled for destruction.
 - c. Records for which extended retention periods have been approved by the Manager, Records Management may be retained for the extended periods.
2. Destruction of records at the time their retention period expires (after necessary approval in accordance with the preceding paragraph) is the responsibility of:
 - a. *Department managers* for those records located in department files.
 - b. *Location records officers* for those records located at on-site or off-site Olin storage centers.
 - c. *Group records officers* for those records located at an off-site commercial storage center.
3. Annually, location records officers are to request all department managers to confirm in writing that records scheduled and approved for destruction have been destroyed in accordance with records retention schedules.

VITAL RECORDS PROTECTION

Identification of Vital Records

1. Generally, vital records can be classified in one of the following categories:

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PROCEDURE**

OC 111 REV. 6/80

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Identification of Vital Records (Continued)

- a. Legal or original Corporate documents such as deeds, leases, Board of Directors meeting minutes, records of incorporation, stockholder records, etc.
 - b. Records containing information essential to the reconstruction of Olin's overall financial position, such as financial statements, accounts receivable detail trial balance, receipts and shipments since last trial balance, general ledger, payroll registers, etc.
 - c. Records containing information that represents irreplaceable time and effort to Olin. These records are basically concerned with Olin's operations and include creative material such as laboratory notebooks, technical reports, engineering drawings, records necessary for reconstruction of a damaged plant, etc.
2. Department managers and location records officers will be responsible for identifying records that are to be safeguarded as vital records and for determining the method of protection.

Protection Guidelines

1. Particular attention must be given to the method of protection and the protection period for records that have been classified as vital and which must be protected so that Olin can reestablish its business or financial position in the event of a disaster.
2. In some cases, it will be necessary to protect the original records; however, in most cases, only a copy of the record need be protected.
3. For the most part, vital records will be protected for extended periods of time, but there will also be cases (such as certain financial records) where it will be necessary to replace the protected records with current data on a frequent basis.
4. For additional information, see Guidelines for Vital Records Identification and Protection (Exhibit F).

Protection Methods

1. Natural Dispersal – In the normal course of business, Olin will generate and distribute vital information to other Company locations or to outside private or government entities. So long as these vital records are maintained at those locations for the period that the information is vital, no additional protective measures are necessary.
2. Another Olin Location – Adequate protection of certain records can be achieved by shipping them to another Olin location (with the original or a copy remaining on-site) to be stored as long as the record is vital. This is similar to the natural dispersal method in preceding paragraph 1.
3. Vaulting – Adequate protection of vital records originals against loss can be achieved by storing them on-site in fireproof vaults.
4. Commercial Records Centers – Off-site commercial locations can be used for safe storage of vital records not otherwise protected (e.g., a disaster-proof vital records center has been established in Hutchinson, Kansas).

Preparation and Approval of Vital Records Protection Schedules

1. At the time Records Retention Schedules, form OC 192 (or Records Retention Revisions, form OC 943) are prepared, determination of those records considered vital is made and is indicated on the form. (See page 4, Preparation, Review and Approval of Records Retention Schedules).

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**CORPORATE STANDARD
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Preparation and Approval of Vital Records Protection Schedules (Continued)

2. Location records officers are to initiate preparation of a Vital Records Protection Schedule, form OC 183 (Exhibit E), based on information included on the final approved records retention schedule; all items marked as vital must be included.
3. For each vital record, the location records officer, together with the department manager, must determine:
 - a. Method of protection, i.e., dispersal, vaulting, shipment to another Olin location or to a commercial records center.
 - b. Frequency of transfer to protected storage, e.g., weekly, monthly, when superseded, etc.
 - c. Protection period.
4. Vital records protection schedules must be approved by the department manager, both the location and Group records officer and the Manager, Records Management. The Group records officer is responsible for ensuring that all vital records protection schedules are properly approved at the Group level and submitted to the Manager, Records Management in Stamford for Corporate approval.
5. After the Manager, Records Management approves the schedules, they will be returned to the Group records officer for distribution. Copies of approved vital records schedules will be maintained in a central file in Stamford where they will be available in event of local disaster and for periodic audit of the system.

Vital Records Transfers

1. The department manager, with the assistance of the location records officer, is responsible for ensuring that vital records are transferred to protected storage in accordance with the final approved records protection schedules. When *current* vital records (such as accounts receivable listings) are to be transferred to protected storage on a frequent basis, the frequency of transfer dates shown on the schedule must be followed carefully to make sure that replacement of this type of vital record is made in a timely manner.
2. If records are protected by the natural dispersal method, no further action is required.
3. Vital records protected by being stored in on-site vaults or at other locations are to be transferred to such storage immediately upon receiving a copy of the approved vital records protection schedules. Such transfers are to be documented in the same manner as when storing other records; however, the forms are to be clearly marked to indicate that *vital records* are being transferred and *only* vital records can be listed on the form.
4. All vital records transfers are to be coordinated with the location records officer who will provide the details for handling. This is particularly important when commercial centers are used because specialized forms are needed in many cases.
5. The Manager, Records Management in Stamford must be contacted whenever the disaster-proof vital records center in Hutchinson, Kansas is to be used for safe storage. The Manager, Records Management will provide instructions and the necessary special forms needed for making the transfer.

Destruction of Vital Records

1. Vital records protected by the natural dispersal method will be destroyed in accordance with the appropriate records retention schedule for the location having the records.

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**CORPORATE STANDARD
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Destruction of Vital Records (Continued)

2. Vital records protected by on-site vaulting or by transfer to another location are to be destroyed in accordance with the protection period shown on the vital records protection schedule. Location records officers are responsible for ensuring that only scheduled destructions are made for records stored at locations for which they are responsible. This is particularly important in cases where such records are simultaneously replaced with up-to-date vital records. When commercial storage centers are used, the appropriate Group records officer will be responsible for ensuring that all scheduled destruction dates are met.
3. Scheduled destruction of records protected at the Hutchinson, Kansas vital records center will be the responsibility of the Manager, Records Management in Stamford. Destruction dates are included on the vital records transfer form and a copy of the form is provided the center at the time records are transferred. Each year, supervision at the center will submit to the Manager, Records Management a list of records scheduled for destruction and request approval for destruction.

CLOSED FACILITY RECORDS

Handling

1. Whenever an Olin facility (office, plant, etc.) is closed, the Group records officer will:
 - a. Ensure that all records whose retention period had not elapsed, especially those records needed to support Olin's tax and/or legal position, are documented on a records transfer form, properly packaged for storage and sent to the Manager, Records Management in Stamford.
 - b. Ensure that all records not needed are destroyed, after obtaining appropriate clearance from both the Group Counsel and the Corporate tax department (see Paragraph 1 under Destruction of Records on page 5).
2. The Manager, Records Management will ensure that all retained closed facility records are:
 - a. Properly stored and controlled.
 - b. Destroyed when the need for their retention has expired.

EXHIBITS INCLUDED

Exhibit A – Records Inventory Worksheet, OC 191

Exhibit B – Records Retention Schedule, OC 192

Exhibit C – Records Retention Revision, OC 943

Exhibit D – Records Transfer, OC 194

Exhibit E – Vital Records Protection Schedule, OC 183

Exhibit F – Guidelines for Vital Records Identification and Protection

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EXHIBIT A
PAGE 1 OF 2

OC-191 REV 6/83



RECORDS INVENTORY WORKSHEET (Instructions on Reverse Side)

GROUP (1)		DEPARTMENT (1)		SECTION (1)		LOCATION (1)	
RECORD TITLE/SERIES (2)						FORM NUMBER (3)	
DESCRIPTION (4)							
FILE LOCATION (5)			FILE ARRANGEMENT (5)			FILE TYPE (5)	
☐ OFFICE AREA ☐ STORAGE AREA ☐ VAULT			☐ ALPHABETICAL ☐ NUMERICAL ☐ CHRONOLOGICAL			COMPUTER GENERATED: ☐ PAPER NON COMPUTER: ☐ MICROFILM ☐ PAPER ☐ MICROFILM	
(6) YEAR*	(7) VOLUME		(8) RATE OF REFERENCE (CHECK ONE)				(9) ACTION (Destroyed after inventory?)
	NO OF DRAWERS	NO OF INCHES	DAILY	WEEKLY	MONTHLY	ANNUALLY	
*EACH YEAR SHOULD BE LISTED SEPARATELY.			PREPARED BY (10)				DATE (10)
TO BE COMPLETED BY DEPARTMENT MANAGER (11)							
IS THIS RECORD SUBJECT TO RETENTION BECAUSE OF A STATUTORY REQUIREMENT (OTHER THAN TO SUPPORT OLIN'S TAX RETURN)? ☐ YES - Enter Statutory Retention Period ☐ NO		DOES THIS RECORD GROUP OR ANY PART OF IT HAVE A U.S. GOVERNMENT SECURITY CLASSIFICATION? ☐ YES ☐ NO		SHOULD THIS RECORD BE CLASSIFIED AS VITAL? ☐ YES ☐ NO		IS THIS THE RECORD COPY? ☐ YES ☐ NO - Enter Location (Dept) of Record Copy	
RECOMMENDED RETENTION PERIOD (Based on Usage)			SIGNATURE				DATE
OFFICE	RECORD CTR	DESTRUCTION					

Actual Size 8 1/2" X 11"
Forms May Be Obtained from Stamford Stockroom

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July 1, 1983

OC-191 (Back) REV. 6/83

INSTRUCTIONS: Instruction numbers refer to like-numbered areas on the form

1. *Enter Group, Department, Section and Location.*
2. *Enter Record Title of document or name of Record Series (i.e., related records which are normally used and filed as a unit).*
3. *If the document is a form, enter Form Number.*
4. *If Record Title is not definitive or is confusing, briefly describe its function or purpose in the Description area.*
5. *Check appropriate boxes for File Location, File Arrangement and File Type.*
6. *In Year column, enter separately each year for which records of this title have been identified.*
7. *Under Volume, indicate Number of Drawers completely dedicated to this record title. If less than a complete drawer is used, measure with a ruler the number of inches of those records in drawer and enter in Inches column*
8. *For each year, enter a check in one column under Rate of Reference to indicate that records for that year are used Daily, Weekly, Monthly, Annually, or that they are used Less Frequently Than Once A Year.*
9. *During the inventory, if it is discovered that any records should be destroyed immediately, indicate this in the Action column.*
10. *Person taking the inventory is to sign the Prepared By space and insert the date signed.*
11. *The Department Manager or his/her designee must review and complete each worksheet concerning Statutory Requirements, Government Security Classification, Vital Records and Record Copy, and then insert the Recommended Retention Period based on volume and reference rates. The person completing the worksheet must then sign and date it.*

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[illegible]



July 1, 1983

OC-192 (Back) REV. 6/83

INSTRUCTIONS: Instruction numbers refer to like-numbered areas on the form.

1. *Enter page number(s).*
2. *Leave blank. Effective Date and Schedule Number will be completed at time of final approval in Stamford.*
3. *Enter in appropriate block Group, Department, Section and Location.*
4. *Number entries sequentially.*
5. *Enter Record Title or Record Series name. When possible, use standard titles provided by the Manager, Records Management.*
6. *Enter retention code as follows, if applicable.*

C = Completion

E = Expiration

S = Superseded

CA = Cancellation

FP = Final Payment

ST = Settlement

T = Termination

7. *Enter in appropriate column the number of years record is to be retained. If there is a statutory requirement, the period entered must not be less than the statutory requirement. All years are in addition to the current year.*
8. *Check (✓) if record must be reviewed by department head before destruction. This is especially important if record is sent to off-site storage*
9. *This column will be used by Corporate tax department to check (✓), where applicable, those records needed to support Olin's tax return.*
10. *Check (✓) if record is Vital, i.e., a document which, following a major catastrophe, would supply information essential to the resumption of operations, enable the Corporation to recreate its legal or financial status, and/or permit the Corporation to fulfill its obligations to stockholders, employees and outside interests*
11. *Check (✓) if record is kept because of a statutory requirement (other than to support Olin's tax return) and enter the legally set retention time. Refer questions regarding statutory retention time to Counsel*
12. *Enter office responsible for maintaining the record copy to support Olin's tax and/or legal position if other than this office. Both Counsel and Corporate tax department will review information entered in this space to determine if appropriate.*
13. *Any additional information pertinent to the records shown on this Schedule may be entered here.*
14. *All approval blanks are to be signed and dated.*

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July 1, 1983

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EXHIBIT C
PAGE 2 OF 2

OC-943 (Back) REV. 6/83

INSTRUCTIONS: Instruction numbers refer to like-numbered areas on the form.

1. Enter page number(s).
2. Leave blank. Effective Date and Schedule Number will be completed at time of final approval in Stamford.
3. Enter in appropriate block Group, Department, Section and Location.
4. Check (✓) the appropriate column to indicate whether record is being added, deleted or revised. If a record is deleted, indicate reason in the Comments section.
5. Enter Record Number from Records Retention Schedule for items to be deleted or revised. Record Number refers to the sequential number assigned when the Records Retention Schedule was prepared. However, in cases where a code number has been assigned to the record type (e.g., Stamford), enter the record code number.
6. Enter Record Title or Series Name. When possible, use standard titles provided by the Manager, Records Management.
7. Enter retention code as follows, if applicable:

C = Completion	E = Expiration	S = Superseded
CA = Cancellation	FP = Final Payment	ST = Settlement
		T = Termination
8. Enter in appropriate column the number of years record is to be retained. If there is a statutory requirement, the period entered must not be less than the statutory requirement. All years are in addition to the current year.
9. Check (✓) if record must be reviewed by department head before destruction. This is especially important if record is sent to off-site storage.
10. This column will be used by Corporate tax department to check (✓) where applicable those records needed to support Olin's tax return.
11. Check (✓) if record is Vital, i.e. a document which, following a major catastrophe, would supply information essential to the resumption of operations, enable the Corporation to recreate its legal or financial status, and/or permit the Corporation to fulfill its obligations to stockholders, employees and outside interests. A record should be checked off as Vital only if the department is the office of record.
12. Check (✓) if record is kept because of statutory requirement (other than to support Olin's tax return) and enter the legally set retention time. Refer questions regarding legal retention time to Counsel.
13. Enter office responsible for maintaining the record copy to support Olin's tax and/or legal position if other than this office. Both Counsel and Corporate tax department will review information entered in this space to determine if appropriate.
14. Any additional information pertinent to the records shown on this Schedule may be entered here.
15. All approval blanks are to be signed and dated.

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GROUP		DEPARTMENT		SECTION		LOCATION	
TEMP BOX NO	RECORD NO.	RECORD TITLE/SERIES (EXACTLY AS APPEARS ON RECORDS RETENTION SCHEDULE)	ADDITIONAL DESCRIPTION (RANGE ALPHA/NUMERICAL)	RECORD DATES FROM TO		REC OFFICER/CENTER TO COMPLETE	REVIEW CODE

OC-194

Olin RECORDS TRANSFER

NOTE: Coordinate all transfers with local records officer who will furnish any necessary completion and handling instructions

PAGE OF

SCHEDULE NUMBER

Actual Size 8 1/2" X 11"

Forms May Be Obtained from Stamford Stockroom

CONFIDENTIAL

PREPARED BY

DATE

APPROVED BY RECORDS OFFICER

DATE

PART 1 RECORDS CENTER CONTROL PART 2 MANAGER, RECORDS MANAGEMENT PART 3 OPERATING DEPARTMENT PART 4 PENDING FILE



CORPORATE STANDARD
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EXHIBIT E
PAGE 1 OF 2

OC-163 REV. 6/83

Olin VITAL RECORDS PROTECTION SCHEDULE (Instructions on Reverse Side)						EFFECTIVE DATE (11)	VITAL RECORDS SCHEDULE NUMBER (1) V.	
GROUP (2)		DEPARTMENT (2)		SECTION (2)		LOCATION (2)		
REC (3) NO.	RECORD TITLE/SERIES (4) (Exactly as appears on Records Retention Schedule)	Retention (5) Period (Total Yrs)	(6) Vital Protection Retention Period	PROTECTION METHOD (7)		(8) FREQUENCY OF SHIPMENT	ONLY COPY (9)	
				On Site Vault	SHIPPED OFF SITE (SPECIFY OFF SITE LOCATION)		YES	NO
	OLI 4092				Forms May Be Obtained from Stamford Stockroom Actual Size 8 1/2" X 11"			
(10) APPROVALS	DEPARTMENT MANAGER			DATE	LOCATION RECORDS OFFICER			DATE
	GROUP RECORDS OFFICER			DATE	MANAGER, RECORDS MANAGEMENT			DATE



CORPORATE STANDARD
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EXHIBIT E
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OC-183 (Back) REV. 6/83

INSTRUCTIONS: Instruction numbers refer to like-numbered areas on the form.

1. *From approved Records Retention Schedule, enter Vital Records Schedule Number (Records Retention Schedule No. with the prefix).*
2. *Enter in appropriate block Group, Department, Section and Location.*
3. *Enter Record Number from Records Retention Schedule. Record Number refers to the sequential number assigned when the Records Retention Schedule was prepared. Where a code number has been assigned to the record type (e.g., Stamford), enter the record code number.*
4. *Enter Record Title or Series Name exactly as it appears on Records Retention Schedule.*
5. *Enter number of years from Destroy column of Records Retention Schedule.*
6. *Enter appropriate protection retention period for each Record Title or Series Name. This will usually be less than the retention period indicated on the Records Retention Schedule.*
7. *Enter protection method – check (✓) if record is protected by storage in On-Site Vault. If shipped Off-Site, enter name and location of off-site storage facility.*
8. *Enter frequency of transfer to protected storage. e.g., weekly, monthly, when superseded, etc.*
9. *Check (✓) appropriate column to indicate if record is the only copy.*
10. *All approval blanks are to be signed and dated.*
11. *Manager, Records Management is to enter Effective Date as of date of final approval, retain one copy and return the Schedule to the Group records officer for distribution to department manager, location records officer and appropriate records center (where applicable).*

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OLI 4093

July 1, 1983

GUIDELINES FOR VITAL RECORDS
IDENTIFICATION AND PROTECTION

Vital records - those necessary to ensure the survival of Olin's business in the event of a disaster constitute a small part of the Company's records, probably no more than two percent. Therefore, it is practical that vital records be given maximum protection from disaster.

In implementing a Vital Records Protection Program, two basic questions must be addressed.

1. Which records contain vital information?
2. How can these records best be protected?

A. WHICH RECORDS ARE VITAL

Records considered as vital may vary from Group to Group. Generally, however, the following types of records should be considered vital records.

1. Records containing information basically concerned with the Company's operations, including such creative material as laboratory notebooks, technical reports and engineering drawings. Such records can be further classified as follows:
 - a. Know-How Records - Much know-how is reflected in drawings and flowcharts of specialized products, plants and equipment. Records of this type include:
 - Product drawings (ammunition tolerances, embossing designs, etc.)
 - Flow diagrams (TDI process, calcium carbonate, ball powder, etc.)
 - Drawings of special tools, jigs, dies, fixtures
 - Special machinery drawings (ammunition machinery, etc.)
 - Special equipment designs (caustic chlorine cell)
 - b. Facilities Records - Records necessary to reconstruct company plants should be protected. Examples of such records are underground service and plumbing drawings, plant layout drawings, major foundation drawings, major equipment arrangement drawings, and utility distribution drawings.
 - c. Drawings - If new facilities must be constructed, the work will be expedited if "as constructed" drawings are available. For this reason, it is advisable to protect virtually the entire drawing list. However, drawings of office buildings, general plant maintenance facilities, gatehouses, changehouses, standard disposal facilities and other service facilities, normally do not need protection.

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EXHIBIT F
PAGE 2 OF 3

2. Records containing information essential in reconstructing Olin's financial position. Generally, this means protection of records which will enable Olin to reconstruct its balance sheet position as it existed prior to the disaster. This will require protection of records relating to assets and liabilities.
3. Legal or original Corporate documents such as deeds, leases, board meeting and shareholders meeting minutes, records of incorporation, stockholder records, etc.
4. Documents detailing stockholders' and employees' rights and obligations.

B. HOW TO PROTECT VITAL RECORDS

There are basically three methods of protection:

1. Existing dispersal of copies of the vital records, either within or outside the organization. In the normal course of business, Olin will generate and distribute vital information to its various locations for use and reference. For example, vital financial and operating statements may be distributed to several plant locations as well as Group and Corporate headquarters. So long as these records are maintained at two or more different locations for the period of time during which the information they contain is vital, additional protection measures should not be necessary if it is formally known who is responsible for the records and how to retrieve them in the event of a disaster.
2. On-site storage in vaults or safes. There is potential danger, however, in storing microfilm in insulated file cabinets, safes or vaults constructed with a crystalline insulating material that generates interior steam when heated by fire. If microfilm is stored in equipment in which interior steam is circulating, it is possible that the steam will enter the microfilm containers and soften and separate the thin emulsion from the cellulose acetate microfilm base, thus destroying the records.

Because of this possibility, it is desirable to prepare a duplicate roll of any vital records in microfilm format. This duplicate copy should be sent to a vital records center for protection.

3. Shipment to a Vital Records Center

- a. Originals - If original records containing vital information are used infrequently, the possibility of sending the original records to a vital records center should be considered.
- b. Duplicates - When the above condition does not exist, it will be necessary to prepare a duplicate copy of the vital records. Any process may be used for duplication - microfilm, magnetic tape, photocopy, etc.

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EXHIBIT F
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When vital information is stored in nonhard copy form, it is important to ensure protection from such conditions as excessive changes in temperature and humidity, and presence of dirt, dust and certain chemical gases in the air.

Normally, each of these problems can be minimized by ensuring that the duplicate is sent to a carefully selected vital records center.

A note on the protection of in-process vital records.

In the event of disaster, in-process vital records (such as laboratory notebooks in which test data is still being entered) will be essential to the company. Such records should be protected against loss and when not in use, they should be filed in fire-resistant filing cabinets, safes or vaults.

OLI 4096