

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
INDEX		
Accounting & Finance	1	
Contracts	2	
Corporate Secretarial	2	
Correspondence/Memoranda	2	
E-mails	2	
General Internal Records	3	
Hotline	3	
Insurance	3	
Internet Records	3	
Internal Audit	3	
Internal Investigations	3	
Investor Relations	3	
Litigation	3	
Marketing/Customer Service	3	
Mergers & Acquisitions	4	
Policies/Compliance	4	
Product Records	4	
Property	4	
Safety (OSHA)	5	
SEC Related Documents	6	
Taxes	6	
Trade	6	
Warranties	7	
Environmental	7	
Employment Records	9	
ACCOUNTING AND FINANCE		
FINANCIAL STATEMENTS	Audited financial statements	Permanent
	Records used in management's assessment of internal controls over financial reporting risk assessments/ travel/FCPA	7 years
	Back-up records for public filings	7 years
	Audits or adjustments to financial statements	7 years
	Sarbanes-Oxley records, including compliance signatures	7 years
	Contingent Liability Review Documents	7 years
GENERAL ACCOUNTING RECORDS	General Ledger and supporting records	7 years
	Depreciation schedules	7 years
	Accounts receivable records	7 years
	Drafts of loan and related documents	Until contract is executed
	Loan records (including bank borrowing records)	Life of the contract plus 8 years
	Accounts payable records	7 years
	Capital assets/expense records	7 years
	Expense Analyses/ expense distribution schedules	7 years
	Sales reports	7 years
	Credit records	7 years
	Name and addresses of customers	7 years
	Outstanding check lists	7 years
	Void stop payment lists	7 years
	Small balance write offs	7 years
	Rating agency communications	7 years
	Letters of credit	Life of the contract plus 8 years
	W-9	Permanent
GENERAL FINANCIAL RECORDS	Bank statements and resolutions reconciliations	15 years
	Inventory reports	10 years
	All budgets	7 years

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	Forecasts	5 years
	Plan documents	1 year from submission
	Cancelled checks	7 years
	Investment records	6 years after divestment of position
	Appropriation requests	1 year
	Rating Agency materials	7 years
CONTRACTS		
	Contract Drafts in all categories	No later than 6 months after execution of the final agreement
	Settlements and releases	Permanent
	Permits (not including environmental)	Period of permit plus 5 years
	Labor union contracts and negotiation materials	Permanent
	Agreements for the purchase and sale of real property	Permanent
	Licensing, distribution, and other intellectual property-based contracts	Permanent
	Employment contracts	Longer of life of contract plus 10 years or term of employment plus 5 years
	General contracts and amendments thereto (includes personal property; tax-related contracts; product warranties of third parties; bank borrowing records; rebate and co-op advertising payments; letter agreements)	Life of contract plus 8 years
	Contracts for the sale of goods; letters setting forth or changing the terms of the contract	Life of contract plus 8 years
	Quotations/ proposals	Life of contract plus 8 years
	Confidentiality and nondisclosure agreements	Life of contract plus 8 years
	Internet user agreements, changes, and notices of changes	Life of contract plus 8 years
	Tax-related contracts	Life of contract plus 8 years
	Requisitions, purchase orders, purchase order register, bills of lading, bills of sale, sales orders	Life of order plus 4 years
	Collective bargaining agreements	3 years from last effective date
	Orders, purchase orders, bills of lading, invoices, etc.	Life of order plus 4 years
	Customer lists	15 years
	Price lists	10 years
	Returned goods records	10 years
	Applications for credit, approval forms, qualification reports	10 years
	Bids (accepted and rejected)	10 years
	Government contracts	3 years post receipt of the final payment under the contract (which is generally made after completion of final audit)** For Federal Government Contracts <u>see addendum</u> attached or life of contract plus 10 years, whichever is longer
	Power of Attorney	Life of contract plus 5 years
CORPORATE SECRETARIAL		
	Minutes	Permanent
	Drafts, notes	Promptly following approval of the applicable minutes
	Clean copy of Board information package, materials specifically referred to in minutes and related correspondence	1 year
	Materials distributed at or prior to meetings other than the copy specified above	Promptly following meeting
	Copies of Annual Report Filings	7 years
	Dividend Schedule	10 years
	Cancelled Stock Certificates	10 years
CORRESPONDENCE/MEMORANDA		
	All correspondence, other than email, and memoranda not otherwise addressed	1 year
EMAILS		
	Refer to Email Management Policy attached to Records Management Policy	

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
GENERAL INTERNAL RECORDS		
	Monthly Presidents Letters	2 months following issuance
	Plan Books and related materials	1 year
	Disclosure Committee materials	1 year
	Global Management meeting materials	1 year
	Growth and Strategy materials	1 year
	QOR materials	1 year
HOTLINE		
	Hotline call records	10 years
	Internal investigation documentation	10 years unless longer period specified elsewhere herein
INSURANCE		
OCCURRENCE TYPE POLICIES	Insurance policies and endorsements, certificates of insurance, and additional insured endorsements	Permanent
	Insurance underwriting and policy placement records (e.g., applications, insurance placement binders, broker communications)	Permanent
	Records sufficient to establish payment of premiums	Permanent
	Records sufficient to establish payments made under insurance policies (e.g., loss runs)	Permanent
	Insurance claim records (e.g., claim notices, proofs of loss, communications with insurers)	5 years from final resolution of claim
CLAIMS-MADE TYPE POLICIES	Insurance policies and endorsements, certificates of insurance, and additional insured endorsements	10 years after policy term ends
	Insurance underwriting and policy placement records (e.g., applications, insurance placement binders, broker communications)	10 years
	Records sufficient to establish payment of premiums	10 years
	Records sufficient to establish payments made under insurance policies (e.g., loss runs)	10 years
	Insurance claim records (e.g., claim notices, proofs of loss, communications with insurers)	5 years from final resolution of claim
INTERNET RECORDS		
	Privacy policies and terms of use, changes to the same, and notices of changes	7 years post last effective date
	Archives of web pages	3 years
	Domain Name registrations	3 years
INTERNAL AUDIT		
	Internal audit reports and work papers	7 years
INTERNAL INVESTIGATIONS		
	Internal investigation workpapers and reports	10 years unless longer period covered elsewhere given the subject-matter of the investigation
INVESTOR RELATIONS		
	Presentations to investors	7 years
LITIGATION		
	Settlement agreements, final court orders, and dismissals	Permanent
	Legal opinions	Permanent
	Requests for departure from records management policy	Permanent
	Records related to litigation against the company, including complaints, correspondence, notes, pleadings, depositions, interim orders, litigation hold notices	Pendency of the case + 5 years
	Records regarding FCPA/ anticorruption enforcement and disciplinary procedures	10 years
	Quarterly litigation reports	3 years
MARKETING/CUSTOMER SERVICE		
	Advertising, brochures, telemarketing scripts, and promotional materials	7 years

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	Public relations campaigns; market research data; marketing plans and competitive overview; and product launches, new product profiles and reporting, and new product reviews	7 years
	Information regarding current and former employees directly involved in telephone sales	2 years
	Verifiable authorizations required under the Telemarketing Sales Rule	2 years
	Press Releases	7 years
	Customer Service Records	1 year
	Customer Service Call Recordings	1 year
MERGERS AND ACQUISITIONS		
	Closed Transactions - Acquisition, merger and divestment agreements and related closing deliveries (deal bibles)	Permanent
	Closed Transactions - Due diligence materials	10 years
	Unexecuted drafts	No later than 6 months following closing
	Prospect Company Files (other than due diligence)	15 years from date of last contact
	Prospect Due Diligence	5 years
POLICIES/COMPLIANCE		
	Final policies (even when superceded)	Permanent
	Policy Drafts	No later than 6 months following issuance of final policy
	Policy workpapers	3 years following issuance of final policy
	Requests for departure from records management policy	Permanent
	Compliance training records	5 years
	3rd Party due diligence work papers	7 years from completion of review
	Conflict Minerals materials	6 years from completion of annual review
PRODUCT RECORDS		
MANUFACTURE	Product formulas, materials lists, and substitution reports	Permanent
	Standard operating procedures	As long as the product is being marketed, produced and/or sold
	Engineering change requests and notices	10 years
	Supplier quality data	10 years
	Equipment inventories	10 years
	Production reports	10 years
	Copies of packaging materials and instructions	10 years
DESIGN	Design records and specifications	As long as the product is being marketed, produced and/or sold
	Engineering records	As long as the product is being marketed, produced and/or sold
	Purchasing records	10 years
TESTING	Lab reports, quality control reports, and other testing (including equipment calibration records)	10 years
	Product liability	10 years
	Testing and Quality Control Reports	10 years
	Reports to the Consumer Product Safety Commission (CSPC)	10 years
DEFECTS/ INJURIES/ MALFUNCTIONS	Records of consumer product claim and complaints related to allegations of significant adverse reactions to human health or the environment caused by a chemical substance or mixture	30 years for complaints by employees or 5 years for complaints by plant site neighbors or customers
(See also, SAFETY)	Reports of accidents, testing, and investigations related to allegations of significant adverse reactions to human health or the environment caused by a product's chemical substance or mixture	30 years for complaints by employees or 5 years for complaints by plant site neighbors or customers
PROPERTY		
REAL PROPERTY	Deeds, surveys, title work	Permanent
	Purchase agreements, Settlement Statements, bills of sale, etc.	Permanent
	Mortgages and proof of satisfaction of mortgage	Permanent
	Permits	Period of permit plus 5 years
	Leases for manufacturing facilities	Life of lease plus 25 years
	Leases for warehouses and office space	Life of lease plus 8 years
PHYSICAL PROPERTY	Manuals and instructions for equipment	Life of the equipment

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	Equipment purchase records	Life of the equipment
INTELLECTUAL PROPERTY	Patents	Permanent
	Opinion Letters	Permanent
	Copyrights	Permanent
	Trademarks, including searches, applications, and records related to usage, marketing, etc.	Permanent
	Outside submissions of new product ideas	Permanent
	Laboratory results	Permanent
	Research records	Permanent
	Product tooling, design, specifications, and research data	Permanent
	Invention notebooks and records	Permanent
	Inspection and test reports on new or proposed products	Permanent
	Invention Assignment forms	Permanent
	Confidentiality agreements and non-disclosure agreements	Life +8 years
SAFETY (OSHA)		
PREPAREDNESS	Emergency action plans	Permanent
	Material safety data sheets (MSDS), safety data sheets (SDS), product safety data sheets (PSDS), product labels, and lists of identities and uses of chemicals no longer in use	30 years
	Records related to determining, analyzing, and communicating hazards	As long as applicable
	Policies regarding workplace injuries	5 years
	Third party safety audits	5 years
	Safety reports	5 years
	Health and safety bulletins	5 years
	Canceled entry permits	1 year
	Documentation of testing and maintenance of facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment	Active until next testing or maintenance
TESTING	Certification and inspection records for overhead, gantry, crawler locomotive, and truck cranes	Life of the equipment
	Records related to workplace monitoring or measuring, including sampling results, collection methodology (sampling plan), description of analytical and mathematical methods used, and summary of other background data relevant to interpretation of results obtained	30 years
	Objective data for exemption from requirement for monitoring for lead; cadmium; and formaldehyde	30 years
	Objective data for exempted operations	Duration of reliance
	Objective data for exemption from requirements for monitoring for acrylonitrile; ethylene oxide; methylenedianiline; 1, 3-butadiene; methylene chloride;	Duration of reliance
	Highly hazardous chemicals compliance audits	2 most recent
	Background data to workplace monitoring or measuring (laboratory reports and worksheets)	1 year
	Records evidencing the performance, inspection, and maintenance of fire extinguishers and extinguishing systems	Earlier of when extinguisher is retested or taken out of service
	Records of inspections and repairs, including certification records, of platform installations, manlifts, slings, mechanical power presses, resistance welders, rigging equipment, hoists and elevators, and safety systems and training records for the same	Current
EMPLOYEE RECORDS	Exposure measurements for inorganic arsenic; lead; 1, 2-dibromo-3-chloropropane; and acrylonitrile	Longer of 40 years or the duration of employment plus 20 years
	Medical surveillance of exposed employees for inorganic arsenic; lead; 1, 2-dibromo-3-chloropropane; and acrylonitrile	Longer of 40 years or the duration of employment plus 20 years
	Medical surveillance of exposed employees for asbestos; cadmium; benzene; ethylene oxide; formaldehyde; methylenedianiline; 1, 3-butadiene; and methylene chloride	Duration of employment plus 30 years
	Records of each employee removed from current exposure to methylenedianiline	Duration of employment plus 30 years
	Training records and certificates of training	30 years

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	Exposure measurements for asbestos; cadmium; benzene; ethylene oxide; formaldehyde; methylenedianiline; 1, 3-butadiene; methylene chloride; hazardous wastes; and hazardous chemicals in laboratories	30 years
	Records related to cotton dust exposure monitoring and medical surveillance of exposed employees	20 years
	Audiometric test records	Duration of employment
	Records regarding medical surveillance of employees exposed to carcinogens	Duration of employment
	Records of each employee removed from current exposure to lead	Duration of employment
	Noise exposure measurement records	2 years
	Respirator fit testing records	Current
CHEMICAL FACILITY SECURITY PROGRAM	Records of submitted Top-Screens, Security Vulnerability Assessments, Site Security Plans, and all related correspondence with the Department of Homeland Security	6 years
	Any and all records related to the Chemical Facility Security Program (including records related to training, drills, and exercises; incidents and breaches of security; maintenance, calibration, and testing of security equipment; audits of the Site Security Plan; and letters of authorization and approval)	3 years
ASBESTOS RECORDS	Written notifications regarding identification, location and quantity of Asbestos-Containing Material and Presumed Asbestos-Containing Material (PACM) (applies only to construction)	Permanent
	Data to rebut PACM (applies only to construction)	Permanent
	Asbestos records related to employees	Permanent
	Asbestos records related to owned/occupied real property	Permanent
	All other asbestos records	Permanent
ACCIDENTS	OSHA records, including the OSHA 300 Log (including updates), privacy case list, annual summary, OSHA 301 Incident Report forms, incident investigation reports, and OSHA 200 and 101 forms	5 years from the end of the calendar year these records cover
SEC-RELATED DOCUMENTS		
	SEC filing-related documents	7 years
	Annual Reports	7 years
	Proxy Statements	7 years
	10-K	7 years
	10-Q	7 years
TAXES		
	Application for Tax Exemption (Form 1023 and State Form) and Determination Letter	Permanent
	All tax related records	7 years
	Excise tax records	4 years
TRADE		
	Incoming and outgoing shipment records	10 years
(See also PRODUCTS: DISTRIBUTION)	Records related to exports, including certificates of origin	10 years
	Records showing quantities, sources, costs, shipment dates, and related information for products assembled abroad with U.S. components	10 years
	Antiboycott Reporting Forms along with any shipment records/investigations and/or reporting to IRS materials.	10 years
ANTICORRUPTION	Third party due diligence materials, including but not limited to certifications of compliance with anticorruption laws, trade laws, FCPA, and anti-bribery laws	7 years
	Certifications of compliance with the FCPA and supporting records	7 years

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
EXPORT ADMINISTRATION REGULATIONS see p. 452 of App. 65-E of the supplement	Records required under § 762.2 of the Export Administration Regulations (EAR) (including export control records; memoranda, notes, and correspondence; applications and certificates; contracts and invitations to bid; books or accounts and financial records; restrictive trade practice or boycott records and reports; notifications from BIS; records related to Iraq and Libya; and other records that are made or obtained subject to this section)	5 years from the latest of: (1) The export from the United States of the item involved in the transaction to which the records pertain or the provision of financing, transporting or other service for or on behalf of end-users of proliferation concern as described in §§736.2(b)(7) and 744.6 of the EAR; (2) Any known reexport, transshipment, or diversion of such item; (3) Any other termination of the transaction, whether formally in writing or by any other means; or (4) In the case of records of pertaining to transactions involving restrictive trade practices or boycotts described in part 760 of the EAR, the date the regulated person receives the boycott-related request or requirement.
TRADING WITH THE ENEMY ACT AND THE INTERNATIONAL EMERGENCY ECONOMIC POWERS ACT	Full record of each transaction	5 years after date of transaction
ARMS EXPORT CONTROL ACT	Records concerning the manufacture, acquisition, and disposition of defense articles and the provision of defense services	5 years
	Reports containing all shipment information of the same	5 years
ATOMIC ENERGY ACT	Records of each import and export of nuclear material or equipment	3 years after each export or import of byproduct materials
CUSTOMS MODERNIZATION AND INFORMED COMPLIANCE ACT (MOD ACT)	All items on the Customs Service's "(a)(1)(A) list"	5 years from the date of import or 3 years after the date of payment of a drawback claim
	Records that directly or indirectly pertain to importing and are kept in the ordinary course of business and supporting records	5 years from the date of import or 3 years after the date of payment of a drawback claim
SPILL INVESTIGATION REPORTS	Reports regarding the actions undertaken following a release of materials that required notification to a government agency	Permanent
SITE INVESTIGATION REPORTS	Reports that included the collection and analysis of historical records related to a properties history, or the collection of soil and groundwater samples for the laboratory analysis and assessment of chemical impacts on the subsurface	Permanent
WARRANTIES		
	Product warranties	Life of the warranty plus 8 years
	Records regarding warranty disputes, including correspondence, meetings, consultations, decisions, and disclosures	4 years after disposition of dispute
	Indices required by the Magnuson-Moss Warranty Act	4 years after disposition of dispute
	Reports regarding warranties (including warranty audits)	4 years after disposition of dispute
ENVIRONMENTAL		
GENERAL ENVIRONMENTAL	Environmental site files, including insurance claims	Permanent
PLANTS AND FACILITIES	External inspections related to a regulator visit testing records and audits.	Permanent
	Permits and registration records	Life of facility plus 5 years
	Internal environmental, safety, property risk, and casualty risk inspections and audit reports	5 years or most recent only if more than one less than 5 years

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (SARA TITLE III)	All reports, notices, and certifications regarding SARA Title III, records used to determine whether the reports, notices, and certifications are required, and records supporting the content of the reports, notices, and certifications	3 years from date of submission of report, notice, or certification
TOXIC SUBSTANCES CONTROL ACT (TSCA)	Production, use and exposure-related information required to be reported under 40 C.F.R. Part 712	Permanent
	Records relating to any serious adverse reactions reported by employees	30 years
	TSCA chemical data required to be reported (certification statement, company and plant site information and chemical-specific information)	5 years beginning on the last day of the submission period; submitters are encouraged to retain records longer than 5 years so that past records are available as reference when new submissions are generated
	Records relating to any serious adverse reactions to human health or the environment reported by any others	30 years
	Premanufacture notification (PMN) filings and supporting documents and exemptions from the same	5 years
	Records regarding substances which U.S. Environmental Protection Agency (EPA) has added as significant new uses, significant new use notices, records documenting exemptions from significant new use requirements, and records supporting all of the same	5 years
	Records that document information reported under the TSCA Inventory	5 years
	TSCA Section 8(a) reports required to be maintained by persons who manufacture or process chemical substances and materials and documentation sufficient to verify or reconstruct the values in the same	3 years
	Copies of each notice sent to customers notifying them of their reporting obligations and return receipts for the same	3 years
SOLID AND HAZARDOUS WASTE (RESOURCE CONSERVATION AND RECOVERY ACT)	All hazardous waste determinations (including analyses performed to determine whether generator's waste is hazardous), reports required by the EPA, test results, inspection reports, and waste analyses regarding the same	3 years/ Permanent
	Documentation of arrangements with local authorities, including site arrangements and local permits	Life of facility plus 5 years
	Records that document training or job experience required for personnel working at facilities related to hazardous waste management	Until closure of facility; for former employees, 3 years after employee last worked at facility
	Records documenting the proper operation of the corrosion equipment of the aboveground/underground storage tanks, corrosion experts' analyses, and records of repairs	Operating life of the tank (including last three tests)
	Evidence that financial assurance has been maintained, including a copy of the financial assurance mechanism and any related documents (e.g., standby trust agreement)	Until the financial assurance requirements have been released (after the tank has been properly closed or, if corrective action is required, after corrective action has been completed and the tank has been properly closed)
	Written manufacturers' claims pertaining to the release detection system and schedules of required calibration and maintenance	5 years after date of installation
	Uniform Hazardous Waste Manifest forms, notices, certifications, waste analysis data and other records regarding land disposal of hazardous waste	3 years from date waste was last sent to on-site or off-site treatment, storage, or disposal; the retention period is extended automatically during any unresolved enforcement regarding the regulated activity
	Records demonstrating compliance with all closure or change in service requirements	3 years after completion of closure or change in service
	Results of any site investigation undertaken at the time of permanent closure	Permanent
	If large quantity generator of universal waste - records regarding all off-site shipments of universal waste (e.g., log, invoice, manifest bill or lading or other shipment document)	3 years from the date of receipt of the shipment of universal waste
	Records regarding sampling, testing, or monitoring and calibration, maintenance, or repair of the release detection equipment	1 year

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) RULE	Registration for above-ground storage tanks	Operating life of the tank
	Facility response plan records	5 years
	Written procedures for and records regarding inspection and testing of aboveground storage tanks, aboveground bulk containers of petroleum and oils	3 years
	Logs of facility drills/exercises, personnel response training and spill prevention meetings; records may be included in facility response plan or as an annex to same	3 years
CLEAN AIR ACT	National Emission Standards for Hazardous Air Pollutants (NESHAP) information, reports and notifications (including information regarding each startup, shutdown, or malfunction; required maintenance; actions taken in periods of startup, shutdown or malfunction; all required measurements needed to demonstrate compliance with relevant standards and notifications; and determinations of nonapplicability)	5 years
	Records of compliance assurance monitoring, if required	5 years
	Records regarding implementation of Risk Management Plan	5 years
	Title V permit records, including monitoring data and support information	At least 5 years from the date of the monitoring sample, measurement report or application
	Continuous emissions monitoring (CEMs) records, including all measurements, data, reports, supporting information, current monitoring plan and quality control plan	3 years
	Servicing records of appliances normally containing more than 50 lb. of refrigerant	3 years
	If required to submit greenhouse gas (GHG) reports - GHG records, including list of all units, operations and processes for which GEG emissions were calculated, emissions calculations and methods used, analytical results and annual GHG reports	At least 3 years from the date of submittal of the annual GHG report
	Records of New Source Performance Standard monitoring	At least 2 years
	Records of NESHAP monitoring	At least 2 years
CLEAN WATER ACT	Permits	3 years
	Records of all data used to complete National Pollutant Discharge Elimination System (NPDES) permit applications and any supplemental information submitted	At least 3 years from the date the application is signed
	If subject to Industrial User reporting requirements - records of monitoring activities and results	At least 3 years
	Records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by an NPDES permit and records of all data used to complete NPDES permit application	At least 3 years from the date of the sample, measurement, report or application
	Discharge monitoring reports and other sampling records	As required by the National Pollutant Discharge Elimination System (NPDES) or storm water permit
FEDERAL FUNGICIDE, INSECTICIDE AND RODENTICIDE ACT	If pesticides are produced - records showing the product name, EPA Registration Number and Experimental Permit Number, if applicable	2 years
EMPLOYMENT RECORDS		
CONTRACTOR INFORMATION GOVERNMENT CONTRACTORS - AFFIRMATIVE ACTION EMPLOYERS	Government contractors required to provide affirmative action to individuals with disabilities and/or disabled veterans and veterans of the Vietnam ERA shall preserve personnel and employment records, including:	Later of 3 years from date of making the record or personnel action
	-records relating to requests for reasonable accommodation	
	-results of any physical examinations	For contractors with fewer than 150 employees or without a contract of at least \$150,000 - later of 1 year from date of making the record or personnel action
	-job advertisements and postings	
	-applications and resumes (including internet applications)	
	-interview notes	

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	-tests and test results	
	-other records having to do with hiring, assignment, promotion, demotion, transfer, lay-off or termination, rates of pay or other terms of compensation, and selection for training or apprenticeship	
	-ability to identify the race, gender, and ethnicity of each employee or applicant	
	Written affirmative action program and documentation of good faith effort	Immediately preceding AAP year
PUBLIC WORKS CONTRACTOR RECORDS (UNDER THE DAVIS-BACON ACT)	Minnesota:	5 years from the last day of the calendar quarter to which they relate
	-list of minority and female recruitment sources	
	-record of responses from recruitment sources when notified of available employment opportunities	
	-records of all solicitation of offers for subcontracts from minority and female construction contractors/suppliers	
	-records of actions taken with respect to each female, minority, or disabled applicant	
	-record identifying time and place of activities related to employer's equal employment opportunity policy and affirmative action obligations	
	-name, address, sex, social security number	
	-work classification or occupation	
	-hourly rate of wages paid (including contributions or costs anticipated for bona fide fringe benefits or cash equivalents) for each week worked	
	-daily and weekly number of hours worked evidencing actual hours worked each day and hours worked in each classification (if more than one)	
	-itemized deductions made and actual wages paid	
	-dates of changes of work status	
	Drafts of loan and related documents	Until contract is executed
SERVICE CONTRACTOR RECORDS (UNDER THE SERVICE CONTRACT ACT OF 1965)	Oregon: Payroll and Certified Statement (WH-38); documents showing contract price and amount paid	5 years from the last day of the calendar quarter to which they relate
	Wisconsin: agent or subcontractor affidavit of compliance with prevailing wage rate determination from each of its agents or subcontractors	
SUPPLY CONTRACTOR RECORDS (UNDER THE WALSH-HEALEY ACT)	Same as Public Works Contractor Records plus:	5 years from the last day of the calendar quarter to which they relate
	-list of wages and benefits for employees not included in wage determination for contract	
	-any list of predecessor contractor's employees which was furnished to contractor by regulation	
	-copy of the contract	
	-overtime wage rate	
	-number of the wage rate decision issued on the project	
	-period in which each employee was engaged on a government contract and the contract number	
	-certificate of age and date of birth for employees under 19	
APPROVED APPRENTICE PROGRAMS	-copies of apprentice certificates	Longer of duration of program or 5 years
	-registration of apprenticeship programs	
	-certification of trainee programs	
	-registration of apprentices and trainees	
	-copy of worker's apprenticeship ID cards	
	-list of applicants to apprenticeship programs in chronological order in which applications were received - include race, national origin, sex, and age	
	-maintain list of requested accommodations from persons in apprenticeship/training program	

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	-summary of qualifications, basis for evaluation, record of interviews, and original application	
	-job assignment, promotion, demotion, layoff, and termination information	
	hours of training	
	affirmative action plan statements	
	-hours of training	
	-affirmative action plan statements	
	-record of hours worked by learners and apprentices	
WORKERS' COMPENSATION		
	-name of any known witness or relevant circumstance -length of service of injured employee -name of supervisor -name and address of employer's insurer -name and address of treating health care provider -date form showing employee's selection of physician -whether injury is expected to result in lost time -all records necessary to complete and verify accuracy of all reports and documents submitted to Board including method of filing -copies of all claims submitted by employees -reports or notices submitted by the employer -every doctor's note/report or documentation of reasonable attempts to obtain such -every medical report pertaining to the claim or documentation regarding attempts to obtain such -all order and awards of workers' compensation board/agency -record of payment of compensation -any voluntary benefits paid by employer -date report of injury was filed with insurance company -date report of injury and summary of rights was provided to employee -date supplemental report of injury was filed with carrier -copy of application for adjudication of claim filed with state agency/board -copies of benefit notices including rehabilitation notices and notices related to qualified medical evaluation process	10 years after closure, settlement or last claim activity
	-notes, correspondence, or documentation related to delay or denial of benefits -notes, correspondence, or documentation related to utilization review process -notes, correspondence, or documentation related to return to work, or modified or alternative work -notes, correspondence, or documentation evidencing legal, factual, or medical basis for non-payment or delay in payment of compensation benefits or expenses -notes, correspondence, or documentation describing phone conversations relating to claims or significant to claims handling, including dates and substance of calls and identification of parties annual claim log including: -name of employee -claims administrator's claim number -date of injury -indication of whether claim is indemnity or medical-only claim -entry if all liability for a claim has been denied at any time -name of corporation employing injured worker -whether claim has been transferred to another adjusting location and the address of the new location	
	NY: Employer's First Report of Work-Related Injury/Illness (Form C-2F)	18 years

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
CHILD LABOR	Where minors under 19 are employed, employers must keep on the premises: -a completed Employee Information Form along with proof of age (birth certificate, driver's license, or ID card issued by state or federal government with name and date of birth) OR documents which contain employee's name, home address, phone number, date of birth, date of hire, and school of attendance -records of hours worked and break times for minors including start and end times, maintained for 60 days preceding last day of last work period for employees under 19 -youth employment certificates; working certificates for 16-18 year old employees	3 years
FAMILY MEDICAL LEAVE ACT (FMLA)	-dates FMLA leave is taken by eligible employees (must be designated in records as FMLA leave and may not include leave required under state law or an employer plan not covered by FMLA) -if FMLA leave is less than one full day, hours of the leave -copies of employee notices of leave furnished to employer under FMLA if in writing -copies of all general and specific notices given to employees in accordance with FMLA -any documents that describe employee benefits or employer policies and practices regarding taking of paid and unpaid leave -premium payments or employee benefits -records of any dispute between the employer and an employee regarding designation of leave as FMLA leave, including written statement from employer or employee of reasons for designation or disagreement -urinalysis drug tests Medical Records - records and documents relating to certifications, recertifications, or medical histories of employees or employees' family members, created for purposes of FMLA, shall be maintained as confidential medical records in separate files/records from the usual personnel files, and if the Americans with Disabilities Act, as amended, is also applicable, such records shall be maintained in conformance with ADA confidentiality requirements	3 years following termination of employment
HEALTH AND SAFETY - EXPOSURE	-name of employee who received safety and health training with signatures of the employees -safety training dates -types and content of safety training -safety training providers -name of person conducting injury and illness prevention plan inspection -written record of notice from employees of known safety and health hazards or other violations of safety and health standards -record of unsafe conditions and work practices identified and actions taken to correct them -records of labor-management safety and health committee meetings and reports to such committees -attendance records of safety committee meetings -names and departments of committee members	5 years or duration of employment, whichever is longer
	for every employee handling or using a "hazardous substance" -name, address, and social security number -name of chemical/substance handled or used, dates of exposure, and other information pertinent to making medical determination	40 years

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	<p>Employee Medical Records including:</p> <ul style="list-style-type: none"> -medical and employment questionnaires or histories -results of medical examinations -medical opinions, diagnoses, progress notes, and recommendations -descriptions of treatments and prescriptions -employee medical complaints -first aid records <p>Does not include:</p> <ul style="list-style-type: none"> -physical specimens -records of health insurance claims maintained separately from employer's medical program -records created solely in preparation for litigation which are privileged from discovery -records concerning voluntary employee assistance programs if maintained separately from employer's medical program and records -first aid records of one time treatment which do not involve medical treatment, loss of consciousness, restriction of work, or transfer to another job, if made on-site by non-physician and maintained separately from employer's medical program and records -medical records of employees who work for employer for less than a year if records are provided to employee upon termination 	<p>Duration of employment plus 30 years</p>
	<p>Employee Exposure Records:</p> <ul style="list-style-type: none"> -environmental monitoring or measuring -biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body specimens -MSDSs -a chemical inventory or other record revealing the identity of a toxic substance or harmful physical agent and where and when the substance or agent was used -work areas where chemical is normally stored/used -maximum amount stored at facility at any time -names and phone numbers of company representatives who are emergency contacts required to be provided to fire chief -sampling results -collection methodology (sampling plan) -description of analytical and mathematical methods used -any compilation of data or other study based on information collected from individual employee exposure or medical records, or information collected from health insurance claim records, provided that the analysis has been provided to the employer or no further work is being done on the analysis 	<p>30 years, updated annually</p>
	<p>Except:</p> <ul style="list-style-type: none"> -background data to workplace monitoring need only be retained for 1 year provided that the sampling results, collection methodology, analytic methods used and a summary of other background data is maintained for 30 years -MSDSs need not be retained for any specified time so long as some record of the identity of the substance, where it was used, and when it was used is retained for 30 years -biological monitoring results designated as exposure records by a specific OSHA standard should be retained as required by the specific standard 	

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	<ul style="list-style-type: none"> -Written Hazardous Communication Program describing methods used to inform employees of hazards of non-routine tasks performed by employees or outside contractors and the hazards associated with chemicals contained in unlabeled pipes in work areas reviewed and updated annually with documentation of the review maintained and kept at each primary workplace facility where hazardous chemicals are present -written outline of training program including how employer will inform workers of chemical hazards; nature of protective measures; nature of any state law requiring training; and information on interpreting labels and MSDSs and relationship between the two -location of MSDS lists -Protective measures for employees including work practices, emergency procedures, and personal protective equipment -dates and frequency of training, record of employees attending, and names of instructors -general safety instructions on handling, cleanup, and disposal of chemicals 	30 years or 5 years after conclusion of employment
HEALTH AND SAFETY - INJURIES AND ILLNESS		
	<ul style="list-style-type: none"> -correspondence relating to trade secrets -requests for MSDSs by non-manufacturing employer' OSHA 300 log -OSHA 300A -privacy case list (if it exists) -annual summary -OSHA 301 Incident Report -old 200, 101, and 801 Forms -worker's and employer's report of occupational injury or disease 	5 years - -5 years following end of calendar year the record covers
EMPLOYEE INCOME TAX RECORDS		
	Records that enable the filing of tax returns correctly stating taxable income each year: -regular books of accounts -other records and data that may be necessary to support entries on the returns	15 years
	<ul style="list-style-type: none"> -payroll tax reports to federal and state agencies -all records relevant to determining the amount of tax due -employer tax identification number employee copies of W-2's returned to employer as undeliverable -copies of employees' and recipients' state withholding exemption certificates -dates and amounts of tax deposits made -copies of monthly tax reports filed -copy of annual reconciliation filed -employer withholding returns and reports filed -dates and amount of income tax withholding payments made -records that would assist in auditing employers' books and records -confirmation number received by taxpayer in ETF and ETP transactions -employees' request to withhold on the basis of cumulative wages -copies of employees' wage and tax statements FICA contribution records: -copies of any return, schedule, or other document relating to the tax -records of all remuneration (cash or otherwise) aid to employees for employment services 	6 years
W-4's		

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	<ul style="list-style-type: none"> -employee's name, address, and account number -total amount and date of each payment -period of services covered by payment -amount of remuneration that constitutes wages subject to withholding -amount of tax collected -explanation for any discrepancy between total remuneration and taxable income -fair market value and date of each payment of non-cash remuneration for services performed as a retail commissioned salesman -other supporting documents relating to each employee's individual tax status -periods in which employees were paid while absent due to sickness or personal injuries and amount and weekly rate of such payments 	Later of 6 years after return is due or tax is paid
	W-4 forms	As long as it is in effect plus 4 years
IMMIGRATION		
	<ul style="list-style-type: none"> -I-9 forms -record of e-Verification of employee eligibility and all records associated with e-Verify registration including original signed attestation form -alien registration number and/or date of issuance of any document authorizing employment in U.S. 	5 years or term of employment or subcontract plus 3 years, whichever is longer
ERISA		
	<ul style="list-style-type: none"> -current information on all plan participants and beneficiaries (including dates of eligibility, hours worked, compensation, and participation) -determinations of employees' eligibility to participate, including entry dates, vesting dates, and years of service -documentation of benefits due or which may become due -quality service reports 	As long as they are relevant to a determination of benefit entitlements
	<ul style="list-style-type: none"> -employee benefit plan records, summary plan descriptions, and notices -copies of all reports and backup materials filed with the IRS, DOL, and PBGC, including all required schedules and attachments -determination letter applications and similar filings and IRS determination letters -compensation of family members of highly compensated employees -deferrals or matching contributions made on behalf of employees participating in 401(k) plans -actuarial statements and valuations -participant benefits statements -records related to COBRA 	6 years after documents are filed or would have been filed but for an exemption
	-HIPAA compliance policies	Later of 6 years from the date created or date last in effect
	-all plan records that are necessary to establish, support, and validate the amount of any required premium and any information required to be reported to PBGC's premium filing instructions, including records that establish the number of plan participants and support and demonstrate the calculation of unfunded vested benefits	6 years after the premium due date
	-certificates of creditable coverage	2 years after either the individual ceases to be covered under the plan or ceases to be covered under COBRA continuation
	Equity Compensation records	5 years
	Public Employee Retirement System Records (PERS)	5 years
	Stock options (exercised and expired)	5 years
MISCELLANEOUS		

SCHEDULE A

to the Records Management Policy

REVISED: January 5, 2022

RECORD TYPE	RECORD DESCRIPTION	RETENTION PERIOD
	New York: retain notices to new hires: -notice and acknowledgement of wages rates -in English and primary language, copies of notice to new hires and employees before February 1 of each year including (1) rate of pay and basis (hour, shift, day, week, salary, piece, commission); (2) allowances as part of minimum wage (tip, meal, lodging); (3) regular pay day; (4) name of employee; (5) address of employer's main office/principal place of business; (6) phone of employer -copy of signed acknowledgement for each notice including affirmation that notice was provided in employee's primary language	6 years
	Washington: written record of identity of person or entity to whom information is disclosed in response to reference request	2 years
	Tennessee: documentation showing completion of substance abuse education and awareness	6

RECORD TYPE

RECORD DESCRIPTION

RETENTION PERIOD

CONTRACTS

Government contracts

3 years post receipt of the final payment under the contract (which is generally made after completion of final audit)

EMPLOYMENT RECORDS

CONTRACTOR INFORMATION

GOVERNMENT CONTRACTORS -
AFFIRMATIVE ACTION EMPLOYERS

Government contractors required to provide affirmative action to individuals with disabilities and/or disabled veterans and veterans of the Vietnam ERA shall preserve personnel and employment records, including:

- records relating to requests for reasonable accommodation
- results of any physical examinations
- job advertisements and postings
- applications and resumes (including internet applications)
- interview notes
- tests and test results
- other records having to do with hiring, assignment, promotion, demotion, transfer, lay-off or termination, rates of pay or other terms of compensation, and selection for training or apprenticeship
- ability to identify the race, gender, and ethnicity of each employee

Written affirmative action program and documentation of good faith effort

Later of 3 years from date of making the record or personnel action

For contractors with fewer than 150 employees or without a contract of at least \$150,000 - later of 1 year from date of making the record or personnel action

Immediately preceding AAP year

PUBLIC WORKS CONTRACTOR
RECORDS (UNDER THE DAVIS-BACON
ACT)

Minnesota:

- list of minority and female recruitment sources
- record of responses from recruitment sources when notified of available employment opportunities
- records of all solicitation of offers for subcontracts from minority and female construction contractors/suppliers
- records of actions taken with respect to each female, minority, or disabled applicant
- record identifying time and place of activities related to employer's equal employment opportunity policy and affirmative action obligations
- name, address, sex, social security number
- work classification or occupation
- hourly rate of wages paid (including contributions or costs anticipated for bona fide fringe benefits or cash equivalents) for each week worked
- daily and weekly number of hours worked evidencing actual hours worked each day and hours worked in each classification (if more than one)
- itemized deductions made and actual wages paid
- dates of changes of work status

Drafts of loan and related documents

5 years from the last day of the calendar quarter to which they relate

Until contract is executed

SERVICE CONTRACTOR RECORDS
(UNDER THE SERVICE CONTRACT ACT
OF 1965)

Oregon: Payroll and Certified Statement (WH-38); documents showing contract price and amount paid
Wisconsin: agent or subcontractor affidavit of compliance with prevailing wage rate determination from each of its agents or subcontractors

5 years from the last day of the calendar quarter to which they relate

SUPPLY CONTRACTOR RECORDS
(UNDER THE WALSH-HEALEY ACT)

- Same as Public Works Contractor Records plus:
- list of wages and benefits for employees not included in wage determination for contract
 - any list of predecessor contractor's employees which was furnished to contractor by regulation
 - copy of the contract
 - overtime wage rate
 - number of the wage rate decision issued on the project
 - period in which each employee was engaged on a government contract and the contract number
 - certificate of age and date of birth for employees under 19

5 years from the last day of the calendar quarter to which they relate

APPROVED APPRENTICE PROGRAMS

- copies of apprentice certificates
- registration of apprenticeship programs
- certification of trainee programs
- registration of apprentices and trainees
- copy of worker's apprenticeship ID cards
- list of applicants to apprenticeship programs in chronological order in which applications were received - include race, national origin, sex, and age
- maintain list of requested accommodations from persons in apprenticeship/training program
- summary of qualifications, basis for evaluation, record of interviews, and original application
- job assignment, promotion, demotion, layoff, and termination information
- rates of pay/compensation
- hours of training
- affirmative action plan statements
- record of hours worked by learners and apprentices

Longer of duration of program or 5 years