

DOCUMENT RETENTION POLICY

1. SCOPE & OBJECTIVES

a. Scope. This Document Retention Policy (“Policy”) applies to all paper and electronic Documents (as defined below) of Construction and Realty Safety Group Inc. (“Company”) in the United States. In this Policy, the term “Document” shall mean all electronic and paper Documents, including without limitation any e-mail messages (including attachments), instant messages (IM’s), memos, letters, written agreements, presentations, invoices, receipts or other Documents generated, distributed or received in connection with Company’s business, regardless of whether in paper or electronic format.

b. Objectives. This Policy is intended to achieve the following objectives:

1. Compliance with Law. Company shall retain each Document for at least such period of time as applicable federal and state law require.
2. Accessibility. Company shall retain each Document in a manner and for a period of time sufficient to ensure that such Document is accessible for so long as the availability of such Document is reasonably necessary for legal or business reasons.
3. Cost reduction. To reduce the high cost of indexing, storing and handling the vast number of Documents that otherwise would accumulate, Company shall discard all Documents whose retention is not necessary for legal or business reasons.

2. OWNERSHIP AND IMPLEMENTATION.

Company owns all Documents regardless of location or mode of storage, communication, transmission or receipt. Company exercises its right to control possession of, access to, use and disposition of all Documents. Such exercise occurs through this Policy, procedures established under this Policy and other Administration instructions. Administration shall be responsible to oversee implementation of this Policy.

3. RETENTION.

a. Retention Periods. The retention period required under this Policy for each category of Document (“Retention Period”) is set forth in the “Document Retention Schedule” attached as **Exhibit A**. If more than one category applies to a particular Document, then the longest Retention Period of the applicable categories shall apply.

b. Filing and Storage. To the extent reasonably practicable, Company shall file, index and store Documents to facilitate appropriate (i) retrieval during the applicable Retention Period and (ii) disposal after such Retention Period. Administration will establish, maintain and improve the procedures necessary to accomplish this Section 3.b of the Policy.

1. “Appropriate retrieval” under this Section 3.b. will include the factors of confidentiality, authorized access and efficiency.

2. To the extent practical, Company employees should upload Documents no longer in active use to the appropriate server, drive or folder (the “Server”) to be designated by Administration. Hard copy (paper) documents no longer in active use should be deposited in a designated location for transfer to the Company’s off-site storage facility. Off-site storage should enable retrieval within one business day.

c. Duplicates and Internal Drafts. To reduce storage costs, internal drafts of Documents may be discarded once they are no longer in active use. For this purpose, “internal draft” means a non-final draft that is produced by Company personnel and is not circulated outside of Company. This paragraph does not apply to Litigation Documents or Contracts.

d. Digital Communications or Files. In addition to all other provisions of this Policy applicable to digital files of Documents (“Electronic Documents”), the following will also apply:

1. Copies. Company employees may make copies of Electronic Documents on portable media or home computers **for the sole purpose of conducting Company’s business.** However, when the business need for such copies ends, employees immediately shall delete all copies of such Electronic Documents other than those on a Company-issued system or network.

2. E-Mail Messages and Instant Messages. To reduce storage costs and network traffic during back-up operations, Administration will implement procedures that permit employees to periodically review e-mail and IM messages and attachments and discard those that, at the time of review, (i) the law does not require Company to retain and (ii) the individual does not reasonably need for Company business purposes. For messages or attachments covered by a Retention Period, employees will transmit the Document to the Server specified by Administration. In preparing the procedures, Administration will consider, in cooperation with the IT Department, automatic discarding of e-mail and IM messages and attachments beyond a certain age in an employee’s e-mail Inbox, Sent and Deleted e-mail folders and any IM messages, subject to the exceptions or exclusions provided in this Policy. Company discourages employee retention of hard copies of e-mail messages and attachments. Employees will discard such hard copies as soon as they complete active use of such hard copies, except those subject to a Retention Period, which employees shall transmit to, or save on, the Server.

3. Voicemail Messages. To reduce storage cost and network traffic during back-up operations, employees will periodically delete their voicemail messages and will periodically discard deleted voicemails.

4. IT Requirements. Administration will coordinate with the Company’s IT Department to arrange for Company to (i) maintain the hardware and software necessary to retain, retrieve and read Electronic Documents during their respective Retention Periods, and (ii) maintain permanent back-up storage procedures that minimize storage of Documents beyond any applicable Retention Period.

4. SEMI ANNUAL DISCARDING OF DOCUMENTS

Every six (6) months, Administration will arrange for the discarding of Documents that have completed their respective Retention Documents, under procedures Administration will define in cooperation with the IT Department and other required business groups. Discarding of Electronic Documents means rendering the files not machine-readable or recoverable. Administration will maintain a discarding log that includes a list of Documents that are discarded and the respective discarding dates.

5. SUSPENSION OF DISCARDING IN CASE OF LITIGATION, GOVERNMENTAL INVESTIGATION OR AUDIT.

Destruction of documents relating to litigation or governmental investigations may constitute a criminal offense. Administration will be responsible for suspending destruction of any litigation related Documents as soon as any litigation, government investigation or audit, civil action or enforcement proceeding is suspected, reasonably anticipated or commenced against the Company, its officers, directors or employees.

Notwithstanding any other provision of this Policy:

a. Upon Administration's receipt of notice of pending or imminent litigation, governmental investigation, or audit (not in the ordinary course of Company's scheduled financial reporting), involving Company, Administration.

1. shall suspend the discarding of Company Documents involving Company; and

2. shall halt deletion and discarding of Documents by Company employees.

b. Any Company employee who receives information regarding potential litigation, governmental investigation, or audit (not in the ordinary course of Company's scheduled financial reporting) involving Company shall notify Administration and the Legal Department immediately.

c. After Administration has suspended the discarding of Documents under this Section 5, Administration shall not reinstate the discarding of Documents until Company has (i) consulted with legal counsel, (ii) identified any Documents scheduled for discarding that should be retained in light of such litigation, investigation or audit, and (iii) determined that such discarding may proceed lawfully and properly.

6. OTHER LEGAL REGULATION

a. **Conversion of Paper Documents.** Many federal and state laws and regulations variously permit and/or regulate programs of "converting" paper Documents (that are subject to retention requirements) to Electronic-Document or other formats for storage and retrieval, followed by discarding of the paper Documents. Before implementing any such program, Administration will consult with legal counsel with respect to applicable legal requirements.

7. PERIODIC DOCUMENTS REVIEW

Administration will establish and coordinate implementation of procedures for periodic company-wide review of Documents not sent to the Server and disposition of such Documents to an off-site facility or discarding.

8. OTHER ADMINISTRATION

a. Annual Policy Review. At least annually, Company will review this Policy to determine whether legal or business requirements warrant any revision. Company may at any time amend, modify, waive or revoke all or any portion of this Policy or replace it with one or more new policies.

b. Applicability. Except as otherwise determined by Administration, this Policy shall apply only to Documents that are produced by, or otherwise come into the possession of, Company's personnel following the adoption of this Policy.

EXHIBIT A

DOCUMENT RETENTION SCHEDULE

Note: For flexibility and reduced need for revision, this Exhibit includes generic business document categories that currently or in the future may be inapplicable to Construction Realty Safety Group Inc. (“Company”). Inclusion of a category in a list does not imply that any such document does or should exist. Any obligation to generate or obtain a document can only be determined separately from this list.

General Note on Retention Periods: All retention periods include the current year, plus the number of years specified—i.e., if three years are specified, then the company would retain 2015, plus 2016, 2017, and 2018.

1. GENERAL CORRESPONDENCE

Category Code	Description	Retention Period
CORR 1	Letters and memos transmitted by postal mail, fax or delivery and not covered by any other Category Code or in the Notes below.	7 years
CORR 2	E-mail correspondence not covered below by any other Category Code	Should be deleted by the relevant employee as soon as no longer needed for business purpose; automatic deletion after 6 months.

2. BASIC CORPORATE DOCUMENTS

Category Code	Description	Retention Period
CORP 1	Charter, Board & Stockholder Documents, including:	Permanently
	Articles of Incorporation	Permanently
	Bylaws	
	Other Corporate Organizational Documents	
	Board Minutes	
	Stock Certificates	
	Cancelled Stock Certificates	
CORP 2	Corporate policies	While in effect 10 years
CORP 3	Internal newsletters or news announcements not covered by other categories.	3 years

3. SECURITIES

Category Code	Description	Retention Period
SEC 1	UCC Filings	Permanently
SEC 2	Stock purchase agreements	Permanently

4. LITIGATION

Category Code	Description	Retention Period
LIT 1	Documents produced, filed or developed in major litigation	7 years after case closed
LIT 2	Documents produced, filed or developed in non-major litigation	Until case closed

5. ACCOUNTING

Category Code	Description	Retention Period
ACC 1	Accounts Payable Documents, including:	10 years
	Accounts payable invoices	
	Accounts payable ledgers	
	Amortization Documents	
	Bills	
	Cash Disbursements	
	Commission Statements	
	Cost accounting Documents	
	Cost sheets	
	Cost statements	
	Debit advices	
	Donations	
	Expense Reports	
	Invoices	
	Petty cash Documents	
	Property taxes	
	Purchase requisitions	
	Royalty payments	
	Travel expenses	
	Unemployment insurance payments	
	Vouchers	
	Workers compensation insurance payments	
ACC 2	Accounts Receivable Documents, including:	10 years

	Accounts receivable ledgers	
	Cash books	
	Cash journals	
	Cash receipts	
	Cash sales slips	
	Collection notices	
	Collection Documents	
	Credit advices	
	Receipts	
	Sales Receipts	
	Uncollected accounts	
ACC 3	Capital Items Documents, including depreciation schedules (includes any items capitalized beyond current tax year for tax purposes)	For so long as Company includes an unamortized balance attributable to the Capital Item on its tax balance sheet + 10 years
ACC 4	General Accounting Documents, including:	20 years
	Account ledgers	
	Balance sheets	
	Books of account	
	Credit applications	
	General ledger, annual	
	General ledger, monthly	
	Journal entries	
	Journals	
	Ledgers	
	Registers	
	Trial balances	
ACC 5	External audit reports	Permanently
ACC 6	Internal audit reports	10 years
ACC 7	Accounting procedures	While in effect + 10 years
ACC 8	Banking Documents, including:	20 years
	Bank reconciliations	
	Bank statements	
	Cancelled checks	
	Deposit and withdrawal Documents	
	Wire transfer Documents	
ACC 9	Financial statements	Permanently
ACC 10	Operating budgets (estimates, projections, planning, memos, etc.)	10 years

6. PAYROLL ADMINISTRATION

Category Code	Description	Retention Period
PAY 1	General payroll Documents, including	7 years
	Form W-2	
	Form W-4	
	Deduction Documents	
	Payroll checks	
	Payroll registers	
	Schedule of pay rates	
	Hours worked and wage Documents	
PAY 2	Time cards	7 years
PAY 3	Employee deduction authorizations	7 years after termination of employee
PAY 4	Documents of deductions from cash wages	7 years

7. TAX FILINGS

Note: Company should not assume that its accountants are retaining its tax returns and related work papers. Company should request copies of its accountant's work papers and retain them.

Category Code	Description	Retention Period
TAX 1	Federal income tax returns and related work papers	Permanently
TAX 2	Other returns and filings with federal, state and local tax authorities (and related work papers, including:	7 years
	Employment tax returns and other filings	
	Excise tax returns and other filings	
	Income tax returns and other filings	
	Property tax returns and other filings	
	Sales tax returns and other filings	
	Unemployment tax returns and other filings	
	Use tax returns and other filings	

8. PERSONNEL

Category Code	Description	Retention Period
PER 1	Employee handbooks, manuals, info sheets or instructions	While in effect +10 years

PER 2	Individual employment or consulting agreements	7 years after termination of employee or consultant (permanently if contains intellectual property assignment, confidentiality or nondisclosure provisions)
PER 3	Applications and offer letters not resulting in employment (for applications and offers letter resulting in employment, see below under PER 16)	7 years
PER 4	Applicant identification Documents	7 years
PER 5	Interview questions	3 years
PER 6	Attendance Documents (general)	7 years
PER 7	Earnings Documents (general)	Permanently
PER 8	Education and training Documents (general)	7 years
PER 9	Fingerprints	10 years after termination of employment
PER 10	Reference letters to or from Company	3 years after termination of employee
PER 11	Job descriptions	While in effect + 3 years
PER 12	Job advertisements, job orders	3 years
PER 13	Training manuals	7 years
PER 14	Union agreements	Permanently
PER 15	Affirmative action programs	While in effect + 3 years
PER 16	Individual employee Documents, including:	7 years after termination of employee
	Individual applications	
	Offer letters	
	Individual applications	
	Offer letters	
	Individual attendance Documents	
	Garnishments	
	Performance evaluations	
	Promotion and demotion Documents	
	Termination Documents	
	Exit interview Documents	
	Withholding information	
PER 17	Federal Employer Information Reports (EEO-Is) and Documents used to prepare EEO	7 years
PER 19	Documents concerning the sex, race or national origin of employees (should be segregated from main personnel file)	7 years after termination of employee

PER 20	Medical histories or health data (should be segregated from main personnel file)	Permanently
PER 21	Documents of accommodation to any disabled employee requesting such accommodation	While in effect + 3 years
PER 22	Documents of leave granted under the Family and Medical Leave Act	While in effect + 3 years
PER 23	Documents of any sexual harassment complaints and the other investigations and actions taken in response	3 years after termination of all employees involved

9. EMPLOYEE BENEFIT PLANS

Category Code	Description	Retention Period
EMP 1	Plan documents	Permanently
EMP 2	Documents of eligibility for benefits	Permanently
EMP 3	Required personal information on employees and former employees (name, address, social security number, period of employment, hourly or salary)	Permanently
EMP 4	Documents of plan administrator setting forth ability to pay	Permanently
EMP 5	Documents of benefits paid to employees or their beneficiaries	Permanently
EMP 6	Plan documents and supporting documentation filed with the Internal Revenue Service, Department of Labor or Pension Benefit Guaranty Corporation	7 years
EMP 7	COBRA materials	7 years
EMP 8	Documents for preparing certificates of creditable coverage, including the name of the group health plan, name of each participant and dependent under the plan and the name, address and telephone number of the party responsible for providing the certificate (e.g., the plan administrator or issuer)	3 years after coverage ceases

10. WORKPLACE SAFETY DOCUMENTS

Category Code	Description	Retention Period
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SAF 1	Documents relating to implementation and maintenance of OSHA injury and illness prevention program	7 years
SAF 2	OSHA 300 summary of work-related injuries and illnesses	7 years
SAF 3	OSHA 301 injury and illness incident report	7 years
SAF 4	OSHA 300-A annual summary of occupational injuries and illnesses	7 years
SAF 5	Material Safety Data Sheets	While in effect
SAF 6	Fire extinguisher testing certifications	While in effect
SAF 7	Workplace violence Documents	7 years
SAF 8	Documents relating to employees exposed to toxic substances or harmful physical agents	Permanently

11. IMMIGRATION

Category Code	Description	Retention Period
IMM 1	Immigration Reform and Control Act Documents (I-9) (should be segregated from main personnel file)	3 years after hire date of relevant employee or one year after termination of his/her employment, whichever is later