

DOCUMENT RETENTION POLICY

Reasons for Policy

The corporate information of EmployBridge Holding Company (“EmployBridge”) and its subsidiaries is important to how it conducts business and manages employees.

EmployBridge must retain certain records because they contain information that:

- Operationally allows EmployBridge to conduct business operations on an ongoing and normal course of business basis.
- Serves as EmployBridge's corporate memory.
- Has enduring business value (for example, it provides a record of a business transaction, evidences EmployBridge's rights or obligations, protects its legal interests or ensures operational continuity).
- Must be kept for legal, accounting or other regulatory requirements.

Federal and state law require EmployBridge to maintain certain records, usually for a certain amount of time. The accidental or intentional destruction of certain records during those minimum amounts of time could result in the following consequences for EmployBridge and/or its employees:

- Fines and penalties.
- Loss of rights.
- Obstruction of justice charges.
- Inference of spoliation of evidence and spoliation tort claims.
- Contempt of court charges.
- Serious disadvantages in litigation.

EmployBridge prohibits the inappropriate destruction of any records, files, documents, samples and other forms of information. This Document Retention Policy (the “Policy”) is in accordance with the Sarbanes-Oxley Act and Foreign Corrupt Practices Act, under which it is a crime to change, conceal, falsify or destroy any record with the intent to impede or obstruct any official or government proceeding. Therefore, this Policy is part of a company-wide system for the review, retention and destruction of records EmployBridge creates or receives in connection with the business it conducts.

Types of Documents

This Policy explains the differences among records, disposable information and confidential information belonging to others.

Records. This Policy covers all types of information created, received or transmitted in the transaction of EmployBridge's business, regardless of physical or virtual format (hereinafter referred to as paper records and/or electronic files). Some examples of where the various types of information are located are:

- Appointment books and calendars.
- Audio and video recordings.
- Computer programs.
- Contracts.
- Electronic files.
- E-mails.
- Handwritten notes.
- Invoices.
- Letters and other correspondence.
- Magnetic tape.
- Memory in cell phones and PDAs/SmartPhones.
- Online postings, such as on Facebook, Twitter and other sites.
- Performance reviews.
- Test samples.
- Voicemails.

Therefore, any paper records and electronic files that are part of any of the categories listed in the Document Retention Schedule contained in the Appendix to this Policy, must be retained for the amount of time indicated in the Document Retention Schedule. A record must not be retained beyond the period indicated in the Record Retention Schedule, unless a valid business reason (or a litigation hold or other special situation) calls for its continued retention. Furthermore, this Policy applies to any electronic file format, whether made, transmitted, or stored on Company hardware and/or software (including PDAs/SmartPhones) owned by the Company and made available for employee use and/or hardware and/or software personally owned by you but also used for Company business. If you are unsure whether to retain a certain record, contact the Records Management Officer or the Legal Department.

Disposable Information. Disposable information consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose. It consists of data that may be safely destroyed because it is not a record as defined by this Policy. Examples may include (applicable to both paper records and/or electronic files):

- Duplicates of originals that have not been annotated.
- Preliminary drafts of letters, memoranda, reports, worksheets and informal notes that do not represent significant steps or decisions in the preparation of an official record.
- Books, periodicals, manuals, training binders and other printed materials obtained from sources outside of EmployBridge and retained primarily for reference purposes.
- Spam and junk mail.

Confidential Information Belonging to Others. Any confidential information that an employee may have obtained from a source outside of EmployBridge, such as a previous employer, must not, so long as such information remains confidential, be disclosed to or used by EmployBridge. Unsolicited confidential information submitted to EmployBridge should be refused, returned to the sender where possible and deleted, if received via the internet.

Mandatory Compliance

Responsibility of All Employees. EmployBridge strives to comply with the laws, rules and regulations by which it is governed and with recognized compliance practices. All company employees must comply with this Policy, the Records Retention Schedule and any litigation hold communications. Failure to do so may subject EmployBridge, its employees and contract staff to serious civil and/or criminal liability. An employee's failure to comply with this Policy may result in disciplinary sanctions, including suspension or termination/separation.

Reporting Policy Violations. EmployBridge is committed to enforcing this Policy as it applies to all forms of records. The effectiveness of EmployBridge's efforts, however, depends largely on employees. If you feel that you or someone else may have violated this Policy, you should report the incident immediately to your supervisor. If you are not comfortable bringing the matter up with your immediate supervisor, or do not believe the supervisor has dealt with the matter properly, you should raise the matter with the Records Management Officer or the Legal Department. In addition, you may use the Integrity Hotline to report any type of violation anonymously using the following addresses: www.intouchwebsite.com/IntegrityHotline, email at IntegrityHotline@GetInTouch.com, and/or phone at 866-928-4718. If employees do not report inappropriate conduct, EmployBridge may not become aware of a possible violation of this Policy and may not be able to take appropriate corrective action. No one will be subject to, and EmployBridge prohibits, any form of discipline, reprisal, intimidation or retaliation for reporting incidents of inappropriate conduct of any kind, pursuing any record destruction claim, or cooperating in related investigations, so long as such report is made in good faith.

Records Management Department and Officer

The Records Management Department, currently under the jurisdiction of the **Corporate Compliance and Audit Services** department, is responsible for identifying the documents that EmployBridge must or should retain, and determining, in collaboration with the Legal Department, the proper period of retention. It also arranges for the proper storage and retrieval of records, coordinating with other departments such as Facilities, IT, and outside vendors where appropriate. Additionally, this department oversees the destruction of records whose retention period has expired.

EmployBridge has currently designated the VP of **Corporate Compliance and Audit Services**, Stuart White, as the Records Management Officer, head of the Records Management Department, to:

- Administer the document management program and help department heads implement it and related best practices.
- Plan, develop and prescribe document disposal policies, systems, standards and procedures.
- Write straightforward document management procedures to instruct employees on how to comply with this Policy.
- Monitor departmental compliance so that employees know how to use the document management system and the Legal Department has confidence that EmployBridge's records are controlled.
- Ensure that senior management is aware of their departments' document management responsibilities.
- Develop and implement measures to ensure that the Legal Department knows what information EmployBridge has and where it is, that only authorized users have access to the information, and that EmployBridge keeps only the information it needs, thereby making efficient use of space.
- Establish standards for filing and storage equipment and recordkeeping supplies.
- In cooperation with department heads, identify essential records and establish a Business Continuity Management Program for each office and department to ensure maximum availability of EmployBridge's records in order to re-establish operations quickly and with minimal interruption and expense.
- Develop procedures to ensure the permanent preservation of EmployBridge's historically valuable records.
- Provide document management advice and assistance to all departments by preparing manuals of procedure and Policy and by onsite consultation.

- Determine the practicability of and, if appropriate, establish a uniform filing system and a forms design and control system.
- Periodically review the records retention schedules and administrative rules issued by the relevant governments to determine if EmployBridge's document management program and its Records Retention Schedule is in compliance with applicable regulations.
- Distribute to the various department heads information concerning applicable laws and administrative rules relating to corporate records.
- Explain to employees their duties in the document management program.
- Ensure that the maintenance, preservation, microfilming, computer disk storage, destruction or other disposition of EmployBridge's records is carried out in accordance with this Policy, the procedures of the document management program and the requirements of federal and state law.
- Plan the timetable for the annual records destruction exercise and the annual records audit, including setting deadlines for responses from departmental staff.
- Maintain records on the volume of records destroyed under the Records Retention Schedule or stored electronically.
- Evaluate the overall effectiveness of the document management program.
- Report annually to the Legal Department on the implementation of the document management program in each of EmployBridge's departments.
- Bring to the attention of the Legal Department any noncompliance by department heads or other employees with this Policy and EmployBridge's document management program.

How to Store and Destroy Records

Storage. EmployBridge's records must be stored in a safe, secure and accessible manner. Any documents and financial files that are essential to EmployBridge's business operations during an emergency must be duplicated and/or backed up at least once per week and maintained off site. See the EmployBridge Business Continuity Management Program and the coordinated efforts with the IT and Facilities departments, which are available on the EmployBridge intranet.

Destruction. EmployBridge's Records Management Officer is responsible for the continuing process of identifying the records that have met the required retention period and supervise their destruction. The destruction of confidential, financial and personnel-related records must be conducted by shredding/electronic degaussing, if possible. Non-confidential records may be destroyed by recycling/electronic overwriting. The

destruction of electronic records must be coordinated with the IT Department and the Records Management Officer.

The destruction of specific records must stop immediately upon notification from the Legal Department that a litigation hold is to begin because EmployBridge may be involved in a lawsuit or an official investigation (see next paragraph). Destruction may begin again once the Legal Department lifts the relevant litigation hold.

Litigation Holds and Other Special Situations

EmployBridge requires all employees to fully comply with its published Records Retention Schedules and procedures as provided in this Policy. All employees should note the following general exception to any stated destruction schedule: If you believe, or the Legal Department informs you, that EmployBridge records are relevant to current litigation, potential litigation (that is, a dispute that could result in litigation), government investigation, audit or other event, you must preserve and not delete, dispose, destroy or change those specific records, including e-mails, until the Legal Department determines those records are no longer needed. This exception, usually referred to as a litigation hold or legal hold, replaces any previously or subsequently established destruction schedule for those records. If you believe this exception may apply, or have any question regarding whether it may possibly apply, please contact the Legal Department and/or the Records Management Department.

In addition, you may be asked to suspend any routine document disposal procedures in connection with certain other types of events, such as the merger of EmployBridge with another organization or the replacement/upgrading of EmployBridge's IT systems and/or other physical filing and storage systems.

Audits and Employee Questions

Internal Review and Policy Audits. The chief financial and legal officers of EmployBridge and the Records Management Officer will periodically review this Policy and its procedures with legal counsel and EmployBridge's certified public accountant to ensure EmployBridge is in full compliance with relevant new or amended regulations. Additionally, EmployBridge will regularly audit employee and corporate files and computer systems to ensure compliance with this Policy.

Questions About the Policy. Any questions about this Policy should be referred to the Records Management Officer, who is in charge of administering, enforcing and updating this Policy.

[Acknowledgement of Receipt and Review]

[I [EMPLOYEE NAME] acknowledge that on [DATE], I received a copy of EmployBridge's Document Retention Policy and that I read it, understood it and agree to comply with it. I understand that EmployBridge has the maximum discretion permitted

by law to interpret, administer, change, modify or delete this Policy at any time with or without notice. No statement or representation by a supervisor or manager or any other employee, whether oral or written, can supplement or modify this Policy. Changes can only be made if approved in writing by the Chief Legal Officer and/or Records Management Officer. I also understand that any delay or failure by EmployBridge to enforce any work policy or rule will not constitute a waiver of EmployBridge's right to do so in the future. I understand that neither this Policy nor any other communication by a management representative or any other employee, whether oral or written, is intended to in any way create a contract of employment. I understand that, unless I have a written employment agreement signed by an authorized EmployBridge representative, I am employed at-will and this Policy does not modify my at-will employment status. If I have a written employment agreement signed by an authorized EmployBridge representative and this Policy conflicts with the terms of my employment agreement, I understand that the terms of my employment agreement will prevail.

[SIGNATURE PAGE FOLLOWS]

[NAME]

[PRINTED NAME]

[DATE]

APPENDIX

RECORD RETENTION SCHEDULE

Occasionally EmployBridge establishes retention or destruction schedules or procedures for specific categories of records. This is done to ensure legal compliance and accomplish other objectives, such as protecting intellectual property and controlling costs. Employees should give special consideration to the categories of documents listed in the record retention schedule below. Avoid retaining a record if there is no business reason for doing so, but consult with the Records Management Department or the Legal Department if unsure. NOTE: The legal term of “employee” for this Record Retention Schedule is used to mean both “colleague” and “associate” as is commonly used by EmployBridge in its normal course of business.

The majority of files may be stored off-site with an approved corporate vendor. The current and prior year paper files must be retained on-site with the exception of New Jersey where payroll/time cards are to be kept on-site for 6 years.

Category	Document Description	Retention Period
Employee Information	Personnel Files	Unless otherwise indicated in this Section, 6 years after termination/separation. ProDrivers: 3 years from last dispatch.
	Personnel Medical Files (kept separate from general Personnel Files)	6 years after termination/separation, unless relates to workplace injury (see Workers’ Comp and OSHA). Note that medical records are confidential and must be retained separately.
	Exit Interview Notes	Keep in Personnel Files, w/ retention 6 years after termination/separation.
	Contracts of Employment	6 years after termination/separation.

Category	Document Description	Retention Period
	Time Off Requests	Hard copies, if any, should be maintained in the employee's Personnel File. Otherwise, if maintained electronically, retained indefinitely.
	FMLA Files	Keep in Personnel Files, w/ retention 6 years after termination/separation.
	Applications/Resumes (solicited & unsolicited)	For applicants who are hired, retain as part of personnel files; including any applicants who were hired but never worked. For applicants who are not hired, 3 years. ProDrivers: 1 year from date of application.
	Job Description Files	All current descriptions should be maintained. Once a JD is materially revised, the previous JD should be retained for 6 years.
	Employee Handbooks	6 years after being revised/superseded.
	Employee Handbook Acknowledgements	Keep in Personnel Files, w/ retention 6 years after termination/separation.
	Confidentiality Agreements	Indefinitely.
	Securities Trading Agreements	Indefinitely.
	Gym Waivers, etc.	6 years after termination/separation.
	Uniformed Services Employment and Reemployment Rights Act (USERRA)	None under USERRA – recommended retention as long as the employee is on leave to fulfill a military obligation plus the length of the period of job restoration rights.

Category	Document Description	Retention Period
Payroll	Payroll Registers	6 years (or indefinitely if maintained electronically).
	Payroll Master Controls	6 years (or indefinitely if maintained electronically).
	Quarterly Payroll Reports	6 years (or indefinitely if maintained electronically).
	Payroll Tax Returns (copies of ADP filings)	6 years (or indefinitely if maintained electronically).
	Action Forms	Indefinitely (hard copies retained as part of Personnel Files are maintained in accordance with those requirements (above).
	W-2s (employer and employee copies)	6 years (or indefinitely if maintained electronically).
	W-4s	6 years (or indefinitely if maintained electronically).
	Timesheets	6 years (or indefinitely if maintained electronically).
	Assignments, attachments and garnishments	Hard copies retained as part of Personnel Files are maintained in accordance with those requirements (above) (or indefinitely if maintained electronically).
	Bank Reconciliations (check stubs)	6 years (or indefinitely if maintained electronically).
Benefits	Plan Documents & Amendments	Indefinitely.
	Plan Determination Letters	Indefinitely.
	Records of Employee Service and Eligibility for Participation in 401(k)	Indefinitely.

Category	Document Description	Retention Period
	Participant Account Statements/Balances (401(k), Flexible Spending, Commuter Benefits)	Hard copies retained as part of Personnel Files are maintained in accordance with those requirements (above) (or indefinitely if maintained electronically).
	401(k) Enrollment/Beneficiary Forms	6 years after termination/separation of employment.
	Deferred Compensation Agreements	6 years past final distribution for that plan year.
	Form 5500 and supporting documentation	6 years.
	Non-Discrimination Testing	6 years.
	Payroll investment requests, confirms and fund statements for payroll contributions with prior recordkeeper	6 years.
	FSA Check Registers and Banking Information	Indefinitely.
	Insurance Policies (Workers' Comp, Healthcare, Disability, Life and AD&D)	6 years after expiration of policy.
	Disability Claims	Maintain as part of Personnel Medical Files.
	Life Insurance Claims	Maintain as part of Personnel Files.

Category	Document Description	Retention Period
Immigration	I-9s, along with the Historic Records Report to be downloaded from the USCIS e-Verify system	3 years after date of hire or 1 year after termination/separation, whichever is later.
	General Immigration Files (Filings, Notices of Approval, General Correspondence)	1 year past termination/separation.
Compensation	Budget & Forecasting Files	5 years.
	Cost Committee Reports	2 years from date of report.
	Performance Appraisals	6 years after termination/separation.
	Performance Appraisals (drafts)	Retain until end of the comp cycle.
	Compensation Sheets (Manager and Committee Worksheets)	Retain until end of the comp cycle.
	Compensation Sheets (Signed)	6 years.

Category	Document Description	Retention Period
Special Circumstances	Records regarding tests and other selection procedures used to make employment decisions.	2 years after the test or procedure ceases to be used. ProDrivers: Records for any driver applicant or employee who has tested positive on drug or alcohol testing, including refused testing. 5 years following date of test or scheduled test.
	Fair Credit Reporting Act records	Disposal is subject to special rules to for privacy reasons. Many records covered by the FCRA are also covered by other laws, e.g. laws governing discrimination, which have longer retention requirements. For those FCRA records that are not also subject to other longer retention periods, 6 years.
	Litigation Hold Documents	Any documents that have been directed to be retained must be held until the Company's General Counsel advises that they can be destroyed.
	EEO – 1 Reports	Most recent report should be retained.
	Workers' Comp Claims	30 years following termination/separation of employment.
	OSHA logs and summaries of occupational injuries and illnesses	5 years following the end of the year to which they relate.
	OSHA medical records, including employee medical records	30 years following termination/separation of employment.

Category	Document Description	Retention Period
	Any inquiries received from prospective employers after employee has terminated/separated.	ProDrivers: 1 year following termination/separation of employment.
	Affirmative action program and supporting documentation	1 year after the end of the calendar year in which the program was in effect.
Other	Legal Invoices	6 years.
	Recruiting Invoices	6 years.
	General Invoices	6 years.
	Consultant Files	6 years.
	Financial statements and non-payroll tax filings	Indefinitely.
	Corporate legal department work product and related records	Indefinitely.
	Board of directors agendas and minutes	Indefinitely.
Notes:		