



DOCUMENT RETENTION POLICY

Reasons for Policy

The corporate information of WMBE Payrolling Inc. dba TCWGlobal and its international affiliates (hereinafter “TCWGlobal”) is important to how it conducts business and manages employees.

Federal and state law requires TCWGlobal to retain certain records, usually for a specific amount of time. The accidental or intentional destruction of these records during their specified retention periods could result in the following consequences for TCWGlobal and/or its employees:

- Fines and penalties.
- Loss of rights.
- Obstruction of justice charges.
- Inference of spoliation of evidence.
- Contempt of court charges.
- Serious disadvantages in litigation.
- Breach of contractual responsibilities/warranties

TCWGlobal must retain certain records because they contain information that:

- Serves as TCWGlobal's corporate memory.
- Has enduring business value (for example, it provides a record of a business transaction, evidences TCWGlobal’s rights or obligations, protects TCWGlobal's legal interests or ensures operational continuity).
- Must be kept to satisfy legal, accounting, or other regulatory requirements.
- Must be kept as part of our contingent and internal employee personnel records.

TCWGlobal prohibits the inappropriate destruction of any records, files, documents, samples, and other forms of information. This policy is in accordance with the Sarbanes-Oxley Act of 2002, 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 TCWGlobal 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.

Confidentiality Level: Internal Use

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Last Updated: 1/15/2025



Records A record is any type of information created, received, or transmitted in the transaction of TCWGlobal's business, regardless of physical format. Examples of where the various types of information are located include:

- Appointment books and calendars.
- Audio and video recordings.
- Computer programs.
- Contracts.
- Electronic files.
- Emails.
- Handwritten notes.
- Invoices.
- Letters and other correspondence.
- Memory in cell phones and PDAs.
- Online postings, such as on Facebook, Instagram, LinkedIn, and other social media platforms and websites.
- Performance reviews.
- Test samples.
- Personnel file documentation
- Medical records and/or documentation

Therefore, any paper records and electronic files, that are part of any of the categories listed in the Records Retention Schedule contained in the Appendix to this policy, must be retained for the amount of time indicated in the Records 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. If you are unsure whether to retain a certain record, contact the Compliance 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 and/or data that may be safely destroyed because it is not a record as defined by this policy. Examples may include:

- 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.

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- Books, periodicals, manuals, training binders, and other printed materials obtained from sources outside of TCWGlobal 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 TCWGlobal, such as a previous employer, must not, so long as such information remains confidential, be disclosed to or used by TCWGlobal. Unsolicited confidential information submitted to TCWGlobal should be refused, returned to the sender where possible, and deleted, if received via the internet.

Mandatory Compliance

Responsibility of All Employees strives to comply with the laws, rules, and regulations that govern it 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 TCWGlobal, 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.

Reporting Policy Violations TCWGlobal is committed to enforcing this policy as it applies to all forms of records. The effectiveness of TCWGlobal'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 to the Compliance Department or to the next level above your direct supervisor. If employees do not report inappropriate conduct, TCWGlobal 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 TCWGlobal 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.

Compliance Department and Record Management Officer

The Compliance Department is responsible for identifying the documents that must or should retain and determining the proper period of retention. It also arranges for the proper storage and retrieval of records, coordinating with outside vendors where appropriate. Additionally, the CCO and CTO will handle communication within departments regarding destruction of records whose retention period has expired.

TCWGlobal has designated Erica Ostberg as the Records Management Officer. The Records Management Officer is head of the Compliance Department and is responsible for:

- Administering the document management program and helping department heads implement it and related best practices.

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Last Updated: 1/15/2025



- Planning, developing, and prescribing document disposal policies, systems, standards, and procedures.
- Writing straightforward document management procedures to instruct employees on how to comply with this policy.
- Monitoring departmental compliance so that employees know how to follow the document management procedures, and the Compliance Department has confidence that TCWGlobal's records are controlled.
- Ensuring that senior management is aware of their departments' document management responsibilities.
- Developing and implementing measures to ensure that the Compliance Department knows what information TCWGlobal has and where it is stored, that only authorized users have access to the information, and that TCWGlobal keeps only the information it needs, thereby efficiently using space.
- Establishing standards for filing and storage equipment and recordkeeping supplies.
- In cooperation with department heads, identifying essential records and establishing a disaster plan for each office and department to ensure maximum availability of TCWGlobal's records to reestablish operations quickly and with minimal interruption and expense.
- Developing procedures to ensure the permanent preservation of TCWGlobal's historically valuable records.
- Providing document management advice and assistance to all departments by assisting with each department's creation of Standard Operating Procedures regarding this subject.
- Periodically reviewing the records retention schedules and administrative rules issued by the governments of locations TCWGlobal has workers located in to determine if TCWGlobal's document management program and its Records Retention Schedule is in compliance with state and foreign regulations.
- Distributing to the various department heads information concerning state laws and administrative rules relating to corporate records.
- Explaining to employees their duties relating to the document management program.
- Ensuring that the maintenance, preservation, microfilming, computer disk storage, destruction, or other disposition of TCWGlobal'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.
- Planning the timetable for the annual records destruction exercise and the annual records audit, including setting deadlines for responses from departmental staff.
- Evaluating the overall effectiveness of the document management program.

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- Reporting annually to the department heads responsible for each department on the implementation of the document management program in each of TCWGlobal's departments.
- Bringing to the attention of the Executive Committee any noncompliance by department heads or other employees with this policy and TCWGlobal's document management program.

How to Store and Destroy Records

Storage TCWGlobal's records must be stored in a safe, secure, and accessible manner. Any documents and financial files that are essential to TCWGlobal's business operations during an emergency must be duplicated and/or backed up at least once per week and maintained off site.

Destruction TCWGlobal's CTO, Records Management Officer, and CFO are responsible for the continuing process of identifying the records that have met their required retention period and supervising their destruction. The destruction of confidential, financial, and personnel-related records must be conducted by shredding if possible. Non-confidential records may be destroyed by recycling. The destruction of electronic records must be coordinated with the IT Department.

The destruction of records must stop immediately upon notification from the Compliance Department that a litigation hold is to begin because TCWGlobal 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

TCWGlobal requires all employees to comply fully with its published records retention schedule 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 Compliance Department informs you, that TCWGlobal's 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 records, including emails, until the Compliance Department determines those records are no longer needed. This exception is 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 questions regarding whether it may possibly apply, please contact the Compliance 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 TCWGlobal with another organization or the replacement of TCWGlobal's information technology systems.

Audits and Employee Questions

Internal Review and Policy Audits The CFO and CTO will periodically review this policy and its procedures with CCO/General Counsel and/or TCWGlobal's certified public accountant to ensure TCWGlobal is in full compliance with relevant new or amended regulations. Additionally, TCWGlobal will regularly audit employee files and computer hard drives to ensure compliance with this policy.

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Last Updated: 1/15/2025



Questions About the Policy Any questions about this policy should be referred to the CCO & General Counsel, Erica Ostberg (erica.ostberg@tcwglobal.com) who oversees administering, enforcing, and updating this policy.

APPENDIX

Record Retention Schedule

Occasionally TCWGlobal 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 and consult with the Compliance Department if unsure.

RECORD	RETENTION PERIOD
Personnel Records	
US based Employees	7 years
UK based Employees	At least 6 years
Canada based Employees	At least 3 years
Australia based Employees	7 years
New Zealand based Employees	At least 6 years
Israel based Employees	7 years
Prescreening Records (Current vendor – Sterling)	TCWGlobal access for 13 months; Sterling retains for 6 years to comply with FCRA
Benefits Data US (Current vendor – Plansource)	3 years
Candidate data (Name and Email) that do not accept engagement	30 days after rejected offer
Payroll Records	
Employee Payroll data within Tempworks	7 years
Paycards (Current vendor – Rapid!)	6 years
Non-Direct Worker Records	
Tracked Worker data (including offer letter and client specific documents)	7 years or until deletion request received by individual

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Last Updated: 1/15/2025

Onboarding documents for Partner (passport, direct deposit information, etc.)	60 days after employment/onboarding completed with Partner
Talent Pool	Until Candidate opt out or deletion request received.
Corporate Records	
Articles of Incorporation, Bylaws, Corporate Seal	Permanent
Annual corporate filings and reports to secretary of state and attorney general	Permanent
Board policies, resolutions, meeting minutes, and committee meeting minutes	Permanent
Contracts	Permanent if current (7 years if expired)
Construction documents	Permanent
Emails (business related)	3 years
Fixed Asset Records	Permanent
IRS Form 1023 (Application for charitable and/or tax-exempt status)	Permanent
IRS Determination Letter	Permanent
Sales and purchase records	3 years
State sales tax exemption documents	Permanent
Resolutions	Permanent
Accounting and Finance	
Accounts Payable and Receivables ledgers and schedules	7 years
Annual audit reports and financial statements	Permanent
Annual plans and budgets	2 years
Bank statements, cancelled checks, deposit slips	7 years
Business expense records	7 years
Check registers	Permanent
Electronic fund transfer documents	7 years
Employee expense reports	7 years

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General ledgers	Permanent
Invoices	7 years
Petty cash vouchers	3 years
Tax Records	
Annual tax filing for the organization (IRS Form 990 in the US)	7 years
Filings of fees paid to professionals (IRS Form 1099 in the US)	7 years
Payroll tax withholdings	7 years
Earnings records	7 years
Payroll tax returns	7 years
State unemployment tax records	Permanent
Legal and Insurance Records	
Appraisals	Permanent
Environmental studies	Permanent
Insurance disbursements and denials	Permanent
Insurance claims/applications	Permanent
Insurance contracts and policies (Directors and Officers, General Liability, Property, Workers' Compensation)	Permanent
Leases	6 years after expiration
Patents, patent applications, supporting documents	Permanent
Real estate documents (including loan and mortgage contracts, deeds)	Permanent