

 <b>DW TOWER, INC.</b>	<b>HUMAN RESOURCES</b>		
	POLICIES AND PROCEDURES		
SUBJECT	ISSUED	REVISED	NO.
<b>Employee Records</b>	03/01/2007		H-304
APPROVED			
<i>Approved with Policy A-100</i>			
President			

**Purpose:** The purpose of this policy is to describe the purpose and general contents of D. W. Tower, Inc.'s personnel records and the procedures for team members to view their files.

**Policy:** Personnel records are maintained on each team member for employment management, tax records, compensation changes, benefits enrollments, and other government-required purposes. These records are the property of D. W. Tower, Inc. and generally, access to the information they contain is restricted to the President, COO and Human Resources. Other Management personnel of D. W. Tower, Inc. who have a legitimate business reason to review information in a file may also be granted access. As a matter of policy, and in compliance with the Health Insurance Portability and Privacy Act (HIPPA), the Company maintains a file separate from the Personnel File, called the Confidential File, which contains any Private Health Information (PHI) and other sensitive or confidential records.

**Scope:** This policy applies to all team members of D. W. Tower, Inc.

**Procedures:**

1. The President is responsible for ensuring that this policy is followed.
2. D. W. Tower, Inc. maintains two distinct team member personnel files. One file is named the Personnel File. The other file is named the Confidential File.
3. The Personnel File is stored separately from the Confidential File.
4. The Personnel File may contain, but is not limited to, employment information such as an employment application, a resume, performance appraisals, records of changes in compensation and position, discipline records, payroll deduction authorizations, legal notices such as child support orders and qualified domestic relations orders (QDRO), acknowledgements of receipt of Company equipment and communications, driver's license reports, background check summaries, attendance records, and training records and certification/licenses.
5. The Confidential File may contain, but is not limited to, Private Health Information (PHI) obtained by the Company in order to administer healthcare plan benefits, enrollment applications for benefits plans, Workers' Compensation records, drug and alcohol testing results, and doctor notes and/or receipts. Access to the Confidential File, and any sharing of information from the Confidential File in any format, is restricted to the President, unless authorized in writing by the President. A record of File access and any sharing of information from the File will be maintained.

6. The Proof of Eligibility to Work in the United States, commonly called the I9, is maintained in yet another file maintained by Company.
7. Team members are responsible for promptly reporting any change in their personal information. This includes, but is not limited to, dependent, address, phone number, and marital status changes. It is to the team member's advantage to keep personal information up-to-date in the employee records because certain benefits, communications and processes are affected by such personal information.
8. Management and designated supervisors who wish to review a team member's Personnel File and/or Confidential File must identify the purpose of the examination and coordinate the review with Human Resources. Those approved to review a File will be allowed to view the team member's file(s) in the presence of an individual appointed by D. W. Tower, Inc. and may not remove information from the file(s). Or remove the file from the premises.
9. Team members who wish to review their own Personnel File or Confidential File should contact the Human Resources. With at least 48 business hours advance notice, team members may review their own Files in the presence of an individual appointed by D. W. Tower, Inc. The team member may not remove information from the Files. Team members may request copies of information in the Files.
10. Team members who have a concern about the accuracy or appropriateness of any information in their Personnel or Confidential Files should inform Human Resources of the concern in writing. The President will designate an appropriate individual to investigate and respond in writing within a two-week period of receiving the written notice from the team member. Based on the investigation, information in the file may be deleted, supplemented or explained.
11. D. W. Tower, Inc. does not release personal information from Personnel or Confidential Files to outside parties (except in cases of court order), but will verify or confirm inquiries submitted from responsible, reliable sources, with written authorization from a team member.

See the HIPAA Policy and the Record Retention Policy for additional information.

**Anyone found violating any portion of this policy may be subject to disciplinary action, up to and including termination.**

No changes will be made to this policy or any deviations authorized without the express written permission of the President.