



Greif Records Management and Retention Policy

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POLICY

Records should be retained only for as long as they:

- are in effect
- have a continued business purpose
- are actively used
- have not been superseded by more current material

Unless:

- a longer retention period is required by law
- they are identified as relevant to a subpoena, a government investigation or litigation, or a reasonably anticipated threat of any of the foregoing
- they constitute Vital Records or Historical Records
- retention is approved, in writing, for other specific purposes consistent with this Policy

OBJECTIVES

KEEP Records long enough to meet retention requirements.
LOCATE Records quickly and efficiently when needed.
PRESERVE Records with precision.
DESTROY Records as soon as retention requirements have

What are Records?

“Records” are all documents, information and data created or received in the course of Greif’s business in any form or media. 1

Categories of Records

Certain Records, such as Vital Records (Records needed for the continuity of the business) and Historical Records (Records that have significant historical value to the Company) must be handled in a specific manner. 2

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All Greif employees are responsible for ensuring that accurate and complete Records are identified, retained, stored, protected and subsequently disposed of in accordance with the requirements of **this** Policy. 4

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Greif Records Day--Annual day in which all Greif employees will review, organize, catalog, file, store, delete or properly dispose of all Records. 8

Hold Orders—Issued because of a subpoena, government investigation or litigation or a reasonable threat of any of them 8

While Records are subject to a Hold Order:

- Employees must not erase, purge, delete, discard, alter or dispose of the Records in any manner
- Records must be retained beyond their normal retention requirements, until the hold order is rescinded
- After a Hold Order is rescinded, the Record retention periods revert to the Master Schedule

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RECORDS MANAGEMENT AND RETENTION POLICY

- I. **Purpose:** To provide employees of Greif, Inc. and its U.S. subsidiaries (“Greif”) a comprehensive Records Management and Retention Policy (the “Policy”) applicable to all locations, business divisions and corporate departments in the United States to maintain the integrity of Records while utilizing common retention periods and common terminology throughout Greif.
- II. **What are Records?** “Records” are all documents, information and data created or received in the course of Greif’s business in any form or media, including:
- ❖ handwritten notes, diaries, calendars and ledgers
 - ❖ typed or printed documents and materials
 - ❖ electronic documents (e.g., e-mail, instant messaging, text messages, voice mail, websites)
 - ❖ presentations, graphics, power point and other medium
 - ❖ machine readable items (e.g., microfilm, microfiche)
 - ❖ video and audio
 - ❖ documents, information and data contained in network servers, document management systems, computer hard drives, back-up tapes, CDs, diskettes, USB drives, Zip disks, PDAs or other electronic storage devices.

All Records are the property of Greif, whether located at the office or at home, on a laptop computer or on a home computer, and are subject to this Policy. Personal documents, “junk” mail and published works are not “Records” and therefore, are not subject to this Policy.

III. **Objectives:**

KEEP Records long enough to meet retention requirements.

LOCATE Records quickly and efficiently when needed.

PRESERVE Records with precision.

DESTROY Records as soon as retention requirements have expired.

- IV. **Policy:** To maintain Records in a cost-effective manner and in compliance with applicable legal and contractual requirements, and to consistently, systematically and non-selectively destroy Records once the appropriate retention requirements and protection needs have been satisfied. Records should be retained only for as long as they:
- ❖ are in effect;
 - ❖ have a continued business purpose;
 - ❖ are actively used; or
 - ❖ have not been superseded by more current material unless
 - ✓ a longer retention period is required by law (*see* Section VI or contract);
 - ✓ they are identified as relevant to a subpoena, a government investigation or litigation, or a reasonably anticipated threat of any of the foregoing;

- ✓ they constitute Vital Records or Historical Records (as defined in Section V); or
- ✓ retention is approved, in writing, for other specific purposes consistent with this Policy.

V. Categories of Records:

IMPORTANT: A date should appear on all Records to establish a reference point and facilitate compliance with this Policy.

- A. **Official Record.** The “Official Record” is the original, master or final version of a Record. Where multiple copies of the same Record exist within Greif, the “Official Record” is the Record that should be maintained in accordance with this Policy.
- B. **Copies.** Unless instructed otherwise in connection with a Hold Order (*see* Subsection VIII.C), all copies of Records other than the Official Record should be discarded when they no longer have informational value. In no instance should a copy of a Record be kept longer than the Official Record. A Hold Order is a hold placed on specific Records to comply with regulatory or “duty to preserve” requirements in connection with a pending or threatened legal proceeding or a government investigation.
- C. **Drafts and Work Papers.** Unless instructed otherwise in connection with a Hold Order, drafts, work papers and notes should be discarded upon the completion of the final document, unless they are an integral part or essential backup of an Official Record (in which case, the drafts, work papers and notes should be retained with the Official Record). In no instance should drafts, work papers and notes be kept longer than the relevant Official Record.
- D. **Vital Records.** “Vital Records” are those Records that are necessary for the continuity of the business of Greif. Without these Vital Records, the business would be significantly impaired or could not survive a catastrophe because they are necessary for the re-creation of the business. Vital Records include those Records which:
- are essential to the continuation of operations (e.g. personnel files; accounts payable; business permits and licenses; plant inspection reports; health, safety and environmental regulatory records; joint venture, merger and acquisition agreements; leases, deeds and other real estate agreements; contracts for purchase of raw materials, supplies and equipment; confidentiality agreements; and license agreements);
 - are essential to Greif's legal or financial status (e.g. minute books; stock records; bank account numbers; tax returns; investment documents; promissory notes; credit agreements; guarantees; consignments; liens; and documents relating to the foregoing);

- are necessary for fulfillment of obligations to stockholders, employees, customers and/or outside interests (e.g. distribution agreements; sales representative agreements; employment agreements; bylaws; stock certificates; and corporate record books);
 - contain secret processes, trade secrets, technical information, know-how, formulae, or innovations which are not registered elsewhere (e.g. engineering drawings and operational excellence improvements; commercial excellence and other appropriate customer information; lab tests); or
 - denote Greif's ownership of assets that would otherwise be difficult or impossible to establish (e.g. accounts receivable; asset purchase agreements; agreements for acquisition or sale of a product line or business assets).
- E. **Historical Records.** "Historical Records" are Records that have permanent historical value, including:
- Records documenting company managerial functions;
 - Financial Records, including audit reports, and financial statements;
 - Records documenting key strategic decisions and changes in company structure;
 - Records that document key company activities; and
 - Photographs depicting work processes, innovative technologies, and plants.

VI. **Record Retention Master Schedule:**

- A. **Master Schedule.** The Record Retention Master Schedule (the "Master Schedule"), appended to this Policy, prescribes the retention periods for certain Records. These retention periods have been established based upon a variety of factors, including internal business needs, legal and contractual obligations, and tax and fiscal responsibilities. The retention periods prescribed by the Master Schedule are mandatory, and any deviation must be authorized in advance by the Greif Legal Department.
- B. **Procedure For Amending The Master Schedule.** The Greif Legal Department will periodically re-evaluate and update this Policy as needed according to the current best practices utilized for records management and retention. Any Greif personnel who believes that the retention period governing specific Records should be modified because of changes in legal, contractual, auditing, or management requirements, or who believes that a new Record should be added to the Master Schedule, should submit a completed Amendment to the Master Schedule, a form of which is appended to this Policy.

VII. Establishment and Implementation of Records Management Procedures:

A. Delegation/Responsibilities.

1. Employees. All Greif employees are responsible for ensuring that accurate and complete Records are identified, retained, stored, protected and subsequently disposed of in accordance with the requirements of this Policy. Employees must safeguard Records from loss, theft, unauthorized disclosure and accidental destruction. Each employee who creates, maintains or retains any Record (a "Holder") must do so in compliance with this Policy and must maintain an index for identifying, tracking, storing and locating all active and inactive records (the "Records Index") in use.
2. Holders of Vital Records or Historical Records. Each Holder of Vital Records or Historical Records must be responsible for ensuring that they are protected in the event of disaster and retained in compliance with this Policy, including compliance with the provisions of Subsection E(2).
3. Legal and Tax Departments. The Greif Legal Department and Greif Tax Department personnel are available:
 - a. to serve as liaisons with Holders and supervisors;
 - b. to assist regarding Records designations and legal and statutory requirements for Records retention; and
 - c. to provide counsel regarding Records retention issues applicable to subpoenas, government investigations, litigation, or a reasonably anticipated threat of any of the foregoing, and other pending legal matters.
4. Departing Employees. Each supervisor is charged with maintaining the integrity of all Records in the possession, custody, or control of the employees reporting to him or her who resign, are terminated, change job responsibilities or otherwise leave a position. Upon separation from Greif, each employee must return all Records in his or her possession or control to his or her supervisor.
5. Office Moves. In the event a location, business division, or corporate department is moved or closed, consolidated or discontinued, the individual who has supervisory responsibility for that location, division or department must be responsible for maintaining the integrity of all affected Records, including but not limited to, taking written inventory, labeling, packaging and transferring Records to storage or to the new location, business division, or corporate department, as the case may be.

B. Records Retention Periods.

1. A date must appear on all Records to establish a reference point and to facilitate compliance with this Policy.
2. Records subject to retention requirements under federal, state, or local laws or pursuant to contractual obligations should be retained for at least the period required by such federal, state, or local laws or contractual obligations. Otherwise, Records should be retained only for as long as required for Greif's business operations or archival purposes, or to satisfy specific requirements, including but not limited to, accounting, audit, legal, and tax requirements, after which time the Records should be promptly destroyed.
3. Unless otherwise required by this Policy, Records retention periods should be measured to the end of the calendar year (for example: a Record dated July 15, 2015 which must be saved for 2 years, should be disposed of after December 31, 2017).
4. If federal, state, and local statutory and regulatory time periods for Records retention are inconsistent or conflict in any way, the longer and more stringent retention period applies. Each Holder must promptly notify the Greif Legal Department if the Holder becomes aware of any such conflicts.
5. In instances where Greif enters into an agreement, settlement, or consent decree with a governmental agency, customer, supplier or other party and agrees contractually or otherwise to retain Records for periods that exceed the statutory or regulatory retention requirements, the contractual obligations govern the retention period for such Records. It is the responsibility of each Holder negotiating or approving the contract to enforce the retention requirements and the workgroup with the *greatest contact with the performance of the contract* should keep the Official Records relative to that contract. For example, in general, Purchasing should maintain the Records of procurement agreements.
6. Unless Records are Vital Records or Historic Records, destruction of Records must be carried out in a consistent, systematic and non-selective manner once the appropriate retention requirements and protection needs have been satisfied as set forth in the Master Schedule. See "Destruction of Records" under Section VIII.

C. Electronic Records.

1. Records generated and maintained by Greif Information Technology ("Greif IT") will be annually reviewed by the relevant Greif Functional Managers as well as Greif IT Administrators to ensure that the retention requirements for electronic records are being met.

2. Standard practices will be developed and utilized by Greif IT when migrating Records from one storage system to another to preserve the integrity and authenticity of the Records transferred or converted during the migration process. Integrity of data transfers must be adequately tested and documented prior to, during, and after migration. Migrated Records must continue to be accessible to and retrievable by their owners with appropriate access controls. When systems are upgraded or replaced, Records and non-records on the old systems must be deleted and rendered unrecoverable prior to disposing of the old system or equipment.
3. Electronic Records are to be stored in a secure and controlled environment by Greif IT or a third party records storage vendor contracted by Greif IT to ensure the security and data integrity of the electronic media.
4. E-mail messages should be discarded, at the User's desktop computer level, as soon as the messages have served their business purposes. If an e-mail has a continuing business purpose that requires retention beyond the scheduled retention period, the User may print the e-mail and place it in an appropriate paper file or save the Record to the hard drive or Server shared folder. Notes mail archiving should not be used universally to save messages. Before retaining the e-mail, first determine if the e-mail is a "Record" identified on the Master Schedule and if so, apply the retention period for the Record according to the Master Schedule. When in doubt, employees should consult their supervisor or the Greif Legal Department or the Greif Tax Department.

E-mails received and sent, drafts and saved messages that are more than two years old that remain in the system will be presumed to have no current business purpose and will be automatically and permanently deleted on a rolling basis as they become more than two years old, unless that process is suspended in accordance with this Policy (such as pursuant to a Hold Order issued in connection with a subpoena, a government investigation, litigation, or a reasonably anticipated threat of any of the foregoing).

E-mails should be sent to the fewest number of individuals possible. Excessive use of "CC:", "BCC:" and "Reply To All" fields is improper etiquette and is discouraged. Employees should use the "CC:" and "BCC:" fields wisely and only when necessary.

D. **Records Storage.** Each Holder must establish a storage area to maintain, control and reasonably protect all Records in his or her possession.

1. **General Business Records:**

- a. **Active Records.** Records are active if they are still in effect, have a continued business purpose, are actively used, or have not been superseded by more current material. Active Records should be stored in the immediate area of the responsible employee, or in a reasonably accessible location.
- b. **Inactive Records.** Inactive Records are generally needed to meet long term operational, compliance or historical requirements but are referenced less often. Inactive Records may be stored off-site when on-site space is limited.
- c. **Storage.** All Records must be inventoried prior to storage and the Records Index updated concurrently with the inventory process and the annual Greif Records Day referred to in Subsection VIII. A.
- d. **Packing and Transferring Records.** Records are to be accurately labeled and packed in storage containers, or other appropriate devices, in accordance with procedures developed by each Holder, in a manner that will facilitate quick and easy reference, review, retrieval, and destruction at appropriate intervals. Transfers to storage should be made annually, except where volume warrants more frequent transfers.
- e. **Access.** Only authorized personnel are allowed access to stored Records.

2. **Vital and Historical Records.** Each Holder who has responsibility for Vital Records or Historical Records should maintain a current list of such Records and, if so requested, should forward the list to the Greif Legal Department. Historical Records should be maintained in a separate storage area protected from fire, theft, water damage and unauthorized access to the extent reasonably possible. It is recommended that Vital Records should be duplicated and the duplicate records stored in an off-site storage facility with appropriate protection from fire, theft, water damage and unauthorized access.

E. **Records Control Forms.** Each Holder should use the control forms provided for use in compliance with this Policy, or other appropriate forms approved by the Greif Legal Department, to accomplish the following:

1. transfer of Records to storage;
2. identification, control and maintenance of Records in storage;
3. retrieval/return of Records from/to storage; and

4. destruction of Records and deletion from the Records inventory, including destruction certificates, which must be permanently retained.

All control forms must be retained permanently.

- F. **Record Retention Audits**. Each location, business division or corporate department may be audited from time to time by the Greif Legal Department for implementation, adherence to, and compliance with this Policy.

VIII. **Destruction of Records:**

- A. **Greif Records Day**. Each year on a day in early January that is not a “core holiday,” Greif will hold a Greif Records Day in which all Holders and other employees will review, organize, file, catalog, store, delete or properly dispose of (as applicable) all Records. Supervisors are responsible for coordinating, advising and managing the Greif Records Day activities in their respective location, business division, or corporate department. This specifically includes reviewing and updating Records Indices and identifying and protecting any applicable Vital Records, Historical Records or Hold Orders. The Greif Legal Department will send out informational materials regarding the Greif Records Day in advance.
- B. **Manner of Destruction**. When the required retention period for a Record has been satisfied, as set forth in this Policy and the Master Schedule, the Record is to be promptly and properly disposed of in a manner that protects the confidentiality and integrity of the Record, and prevents it from being accessible to others. If destruction is to be accomplished by an outside contractor or vendor, the destruction should be certified in writing by the contractor or vendor as having been destroyed. *If not confidential or privileged*, recycling is an acceptable option for paper Records. Electronic Records may be purged, deleted, or erased.
- C. **Hold Orders**. A “Hold Order” is a hold placed on specific Records to comply with regulatory or “duty to preserve” requirements in connection with a pending or threatened legal proceeding or a government investigation. In the event of receipt of a subpoena, a search warrant, a government investigation, litigation, or a reasonably anticipated threat of any of the foregoing, the Greif Legal Department may issue a Hold Order to suspend the destruction of specific Records that otherwise would have been eligible for routine disposal.
1. While Records are subject to a Hold Order, employees must not erase, purge, delete, discard, alter or dispose of the Records in any manner.
 2. Records subject to a Hold Order must be retained beyond their normal retention requirements and until all Hold Orders affecting those Records are rescinded in writing by the Greif Legal Department.

3. After a Hold Order is rescinded, the Records revert to their original categories and may be destroyed according to the Master Schedule.

ALL EMPLOYEES ARE REQUIRED TO NOTIFY THE GREIF LEGAL DEPARTMENT AND THEIR RESPECTIVE SUPERVISOR IMMEDIATELY UPON RECEIPT OF NOTICE OF A SUBPOENA, A SEARCH WARRANT, A GOVERNMENT INVESTIGATION, LITIGATION, OR A REASONABLY ANTICIPATED THREAT OF ANY OF THE FOREGOING.

- IX. **Mandatory Compliance:** Compliance with this Policy is mandatory for all Greif employees. Each business unit or corporate department leader is responsible for inquiring into and monitoring their employees' compliance with this policy.
- X. **Consequence of Violations:** Non-compliance with this Policy may subject the violator to disciplinary action, up to and including termination.
- XI. **Additional Information:** This Policy, the Master Schedule, and related forms, can be accessed on Greif Connection under Legal. Questions regarding this Policy should be directed to the Greif Legal Department.

Original Effective Date: July 1, 2006

Last Revised: January 1, 2017

RECORDS RETENTION MASTER SCHEDULE

NOTE: Different statutes may have different retention periods for the same type of document, in those cases, the longer period shall control.

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference			
		<1	1	2	3	4	5	6	7	10	20	25	30					
Administrative																		
Telephone message slips and old message books		x																
Emergency plans and procedures					x	after superseded												Yes
Visitor logs - office and plant visitors										x								
Accounting and Finance																		
Accounts payable records, including invoices and purchase orders										x								
Accounts receivable records, including invoices, purchase orders, collection reports and related items										x								Yes
Annual audited financial statements	x									x								Yes
Annual audited work paper package (internal)										x								
Annual plans and budgets (and related items for expenses, sales, personnel, etc.)										x								
Departmental Budgets			x	through financial cycle														
Inventory cycle count data								x										
Bank account registers & check registers										x								
Bank Records (statements, deposits/withdrawal records, reconciliation papers, canceled checks)										x								
Capital project cost reports (performance, construction, expenses, changes, etc.)										x								
Cash receipts ledgers and reconciliation										x								
Check Requests										x								
Collections documents (check photocopies/microfilm, depository and transfer reports, etc.)								x										
Commerce Department, Census Bureau and other government surveys										x								
Customer order and payment histories										x								
Debit and credit memos (and related items)										x								
External and internal audit reports											x							
General Ledgers	x																	Yes
Investment Records (records related to investments in stocks, bonds, mutual funds and other financial instruments)	x																	Yes
IRS 1099 data										x								
Freight bills					x													
General journals and other posting & control media subsidiary to the general ledgers										x								
Fixed asset/inventories										x								
Fixed asset/depreciation										x								Yes
Fixed asset historical data sheet										x	after yr of sale/scrap							Yes
Mortgages										x	after release of mortgage							
Petty cash records					x													

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference		
		<1	1	2	3	4	5	6	7	10	20	25	30				
Strategic plans				x													
Superseded interim financial information (periodic reports having no long-term usefulness) (keep only while useful - up to 1 yr)			x														
Travel & entertainment expense records										x							
Trial Balances										x							
Unclaimed payments records (see also Payroll Records)										x							
Communications																	
Catalogs and brochures - generated within company for internal use										x	after superseded						
Communications or articles containing trade, educational, marketing information not containing policy, financial, strategic or technical information					x												
Historical - articles and press releases having historical value	x																
Public relations - press or news releases or other company publication or communication (review for historical value prior to destruction)													x				
Published articles & speeches - addressing policies, financial performance, scientific or technical achievements or business plans (review for historical value prior to destruction)													x				
Speeches (major) by corporate officers					x	thereafter review for historical value											
Correspondence																	
Routine letters and notes that require no acknowledgement or follow-up, such as notes of appreciation, congratulations, letters of transmittal and plans for meetings		x															
Form letters that require no follow-up		x															
Letters of general inquiry and replies that complete a cycle of correspondence		x															
Copies of inter-departmental or other company correspondence that have a copy retained in the originating department's file		x															
Other letters of inconsequential subject matter or which no further reference will be required		x															
Chronological correspondence files		x															
E-mail (refer to Records Management and Retention Policy)		x															
Letters explaining, but not establishing, company policy; letters establishing credit; collections letters after account paid; quotation letters where no contract results									x								
Letters pertaining to patents, copyrights, bills of sale, permits, etc.		Retention period of principal document															
Letters which constitute all or part of a contract or which are important in the clarification points in a contract		Retention period of principal document															

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference
		<1	1	2	3	4	5	6	7	10	20	25	30		
Letters denying liability of the company		Retention period of principal document													
Contracts															
Construction, maintenance, transportation and service contracts requiring indemnity or certificates of insurance from the other party (termination + 30)														x	Yes
Commercial contracts (approval of Legal Dept. prior to destruction)														x after termination	Yes
Employment and labor contracts														x	Yes
Licensing and distribution agreements, including production and royalty														x after termination	Yes
Procurement contracts with vendors														x after termination	Yes
Product liability releases														x after termination	Yes
Product warranties														x after termination	Yes
Realty and personal property leases														x after termination	Yes
Technical Consulting Contracts														x after termination	Yes
Vendor agreements														x after termination	Yes
Corporate Records															
Acquisition, Merger, Divestiture and Reorganization Files	x	Review after 20 years												Yes	
Annual and Quarterly Reports	x														Yes
Board of Directors meeting packets														x	
Business permits														x after superseded or expiration	
Canceled stock certificates	x	Review after 20 years													
Corporate Policies and Procedures														x after superseded	
Directors and Officers questionnaires and responses														x	
Dividend Records	x														Yes
Financing documents, credit agreements, loan agreements, commitments, etc. (approval of Legal Dept. prior to destruction)														x after termination or satisfaction	Yes
Minute books of parent and subsidiary boards, board committees, stockholder meetings; member minutes	x														Yes
Proxy Statements	x														Yes
Proxy cards and ballots executed by shareholders														x	
Records of incorporation or formation, by-laws, operating agreements and amendments; corporate seals	x														Yes
Reports to SEC (10-K, 10-Q, Forms 3, 4 and 5, etc.), including original signature pages	x														Yes
SEC Filings - workpapers and related back-up documentation														x after year of filing	
Securities Registrations (Federal and State)	x														Yes

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference			
		<1	1	2	3	4	5	6	7	10	20	25	30					
Shareholder Records (shareholder meeting records, shareholder lists and related records)	x																Yes	
Shareholder communications (including meeting notices, reports, corporate actions, and related matters)															x			
State Qualification documents	x																Yes	
Customer Credit																		
Application for credit and approval forms			x	after termination/inactivity														
Collection correspondence				x														
Customer financial statements		until superseded or termination & settlement of acct.																
Guarantees, security agreements and subordination agreements					x	after yr of termination & settlement of acct.											Yes	
Financing statements					x	after yr of termination & settlement of acct.												
Electronic Records																		
Refer to Records Management and Retention Policy																		
Engineering and R&D																		
Project files	x																Yes	
Quotes/cost files						x												
Secrecy agreements with customers/competitors	x																Yes	
Engineering drawings - originals (including facilities)	x																Yes	
Engineering equipment job files	x																	
Laboratory notes	x																	
Product testing records	x																	
Export and Import																		
Duty drawback record										x	after year of export							
Export license and control records (Shippers Export Declaration (SED), control procedures, qualifications, etc.)										x								
Export shipments										x								
Foreign Corrupt Practices Act-policies regarding compliance, etc.	x																	
Import records-customs forms and records										x								
NAFTA certificates and supporting documents										x								
Tariff schedules					x	after superseded												
U.S. Customs import binding rulings	x																	
Insurance																		
Certificates - issued for the company										x								
Certificates - issued by the company										x								

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference					
		<1	1	2	3	4	5	6	7	10	20	25	30							
Claim files:																				
a. workers compensation														x	after settlement or release					
b. product liability - no suit														x	after settlement or release					
c. long term disability														x	after return to work, retirement or death					
Loss statistics & date annual loss summaries														x						
Policies for:																			Only "occurrence" policies	
a. environmental risk	x																	Yes	need to be retained permanently.	
b. fidelity & crime	x																	Yes	"Claims made" policies can be	
c. general liability	x																	Yes	destroyed after termination of the	
d. other 3rd party	x																	Yes	claim period + 6-10 years.	
e. product liability	x																	Yes		
f. property	x																	Yes		
g. umbrella	x																	Yes		
h. workers compensation	x																	Yes		
Surety Bonds														x	after termination of bond					
Legal																				
Records relating to Records Management and Retention Policy (including audit records, exception requests, etc.)	x																			
Customer and consumer claims														x						
Intellectual Property:																				
a. copyright registrations	x	permanent or until termination																		
b. copyright searches														x						
c. file history		termination of copyright, trademark or patent + 6 years																		
d. ideas																				
e. U.S. patents issued and assignments		life of patent + 6 years																		
f. U.S. patent application files - abandoned (including provisionals)		6 years after abandonment																		
g. Foreign patents - until expiration, lapse or abandonment +6 yrs)		until expiration, lapse or abandonment + 6 years																		
h. Patent searches/studies - life of patent for invention +3 yrs		life of patent (20 for utility - 14 for design) + 3 years																		
i. Suits:																				
(i) patents:		6 years after after final decision or expiration of patent, whichever is later																		
(ii) trademarks:		1 yr fr reg. Expiration, or 10 yrs after abandonment or current +6 fr date of termination of proceedings, whichever applies																		
j. Trademarks & assignments		3 years after expiration of registration or abandonment																		

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference				
		<1	1	2	3	4	5	6	7	10	20	25	30						
k.Trademark searches					x														
l. Trade secrets	x																		
Investor relations files										x									
Litigation files and related hold orders and communications relating to legal holds		1 year after expiration of appeals or time for filing of appeals or as determined by Legal Dept. on a case by case basis																	
Written arbitration decisions	x																		
Court and regulatory orders involving the company	x																		
Legal memoranda and opinions subject matter files (review for utility and historical value prior to destruction)																			
Invention Assignment Forms	x																		
Notary commission records																			
Software licenses issued to company		as long as software used + 7 years																	
Manufacturing/Safety/Environmental																			
Manufacturing:																			
Annual Plant Managers Environmental Site Report		current only																	
Bills of material					x	after superseded													
Engineering change requests and change notices																			
Facility inspection reports																			
Maintenance manuals and instructions		current only																	
Maintenance records for operations & cost control and performance analysis																			
Manufacturing data, including operating schedules and logs for control, operations analysis, etc.																			
Material substitution records																			
Product quality specifications																			
Product tooling, design, specifications and research data																			
Productions records including quality control and inspections																			
Sample test reports																			
Service equipment and instrument calibration records																			
Supplier quality data																			
Environmental:																			
Environmental audit reports and audit closure reports		current only																	
Environmental compliance records - monitoring and other records relating to compliance with environmental laws (including CERCLA, RCRA, Superfund and TSCA)	x																	Yes	
Environmental permits	x																		
Environmental reports (including Superfund Authorization and Recovery Act (SARA) reports)	x																		

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference				
		<1	1	2	3	4	5	6	7	10	20	25	30						
Environmental site files, including NOVs (notice of violations), enforcement and third party actions, CERCLA notices and responses, insurance claims, monitoring records, and site remediation reports; including documents evidencing resolution, e.g. Consents Orders	x																Yes		
Hazardous Waste Records (including hazardous waste manifests)	x																		
Underground and Above Ground Storage Tanks:																			
a. Closure and remediation records	x																Yes		
b. Operation and maintenance (e.g., testing, monitoring, repair)		life of system																	
Safety and Health:																			
Asbestos records (including remediation and monitoring)	x																		
Material Safety Data Sheets															x			OSHA (29 CFR 1910.1020, 1910.12	
Safety or injury frequency reports, including OSHA logs, reports and summaries								x	following end of calendar year to which report relates									OSHA (29 CFR 1904.44)	
OSHA compliance records (including violations and citations and related documents)											x								
Employee exposure, medical and monitoring records (may be destroyed after 30 years after termination of all affected employees)	x																Yes	OSHA (29 CFR 1910.1020)	
Safety related tests & inspection reports, quality control data, product specs, manufacturing batch data, pilot run data and related research and development items (if for government or industry standards to show conformance with regulations--then Permanent; otherwise, 3 years after origination)	x		or		x														
Safety manuals & instructions					x	after superseded													
Safety and Health Plans and Policies	x																		
Pension and other ERISA Plans																			
ERISA plan documents (including pension plan), summary plan descriptions, and all amendments thereto and all correspondence	x																	ERISA (29 USC 1059)	
Records of employees' and former employees' service and eligibility for pension and other benefits under ERISA plans (including social security numbers, salary, hours worked and any breaks in service)	x																	ERISA (29 USC 1059)	
Pension plan determination letters	x																		
Pension plan contribution and reconciliation reports									x	after yr of report									ERISA (29 USC 1027)
Records of pension payments to employees or their beneficiaries	x																	ERISA (29 USC 1027)	
Reports or pension plan(s) filed with the Department of Labor or the IRS, e.g. summary annual reports, Form 5500	x																	ERISA (29 USC 1027)	

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference		
		<1	1	2	3	4	5	6	7	10	20	25	30				
Personnel and Payroll																	
Advertisements re job openings								x									ADEA (29 CFR 1627.3) - 1 yr from date of personnel action taken
Affirmative Action Plans and Equal Employment Opportunity Plans		while plan is in effect + 10 years thereafter													ADA & Title VII (29 CFR 1607.4)		
Affirmative action and equal employment opportunity compliance reports and studies	x																ADA & Title VII (29 CFR 1607.4) - maintain
Applications, resumes, results of post-offer drug and alcohol testing, interview notes, and related correspondence (non-hired applicants)								x									ADEA (29 CFR 1627.3) - 1 yr from date of personnel action taken
Assignments, attachments, garnishments								x	after yr paid or settled								
Attendance Records (part of personnel file)								x	after termination								
Consolidated Omnibus Budget Reconciliation Act (COBRA) records								x	after termination								
Correspondence with employment agencies and advertisements for job openings								x	from date of hiring decision								
Discrimination Claims									x	after settlement							
EEO-1 Employer Reports					x	after superseded											ADA (29 CFR 1602.7) - current copy
Employee Handbooks										x	after superseded						
Earnings Records (including bonuses and other compensation)	x																
Employee drug testing records (part of personnel file)								x									
Family Medical Leave Act (FMLA) requests and related documents									x	after leave requested							FMLA (29 CFR 825.500)
HIPAA Privacy Notices, HIPAA Disclosure logs, authorization, requests to amend PHI and related correspondence	x																
HIPAA Privacy Consents and Authorizations	x																
HIPPA - Medical histories or health data, (must be kept in separate file marked "confidential" and accessible only to HR Department or with approval of General Counsel)	x																
INS Form I-9 (Employee Verification Eligibility Verification Form):																	IRCA
a. Active Employees	x																
b. Terminated Employees		3 yrs from the date of hire or 1 year after termination - whichever is longer															
Investigations of Employees (part of personnel file)								x	after termination								ADEA (29 CFR 1627.3) - 1 yr from date of personnel action taken
Job Descriptions								x	after superseded								
Labor distribution cost records										x							
Payroll deduction authorization					x	after superseded											
Payroll Records, including wage rates, wages earned, hours worked, overtime hours, additions and deductions from wages paid, and related records									x	after end of year							FLSA (29 CFR 516.1 -.34); Equal Pay Act (29 CFR 1620.32)
Time cards & time sheets (California)							x										
Time cards & time sheets (New York)								x									

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference		
		<1	1	2	3	4	5	6	7	10	20	25	30				
Time cards & time sheets (all states except California & New York)					x												
Payroll Registers (gross & net)													x				
Payroll Tax Records, including Form W-2, W-4 and related records														x	after end of year		
Personnel File, including individual attendance records, wage and salary history, application forms, performance evaluations, termination papers, exit interview records, withholding information, garnishments, test results (individual), employment contracts, separation agreement, etc.																	FLSA (29 CFR 516.1 -.34); Equal Pay Act (29 CFR 1620.32); ADA & Title VII (29 CFR 1602.14); Ohio Admin. Code 4141-23
Polygraph test results and the reasons for administering					x												Employee Polygraph Protection Act
Records relating to promotion, demotion, transfer, layoff, recall, or termination (part of personnel file)																	ADEA (29 CFR 1627.3) - 1 yr from date of personnel action taken
Requests for Accommodations (part of personnel file)																	ADA & Title VII (29 CFR 1602.14) - 1 yr
Sexual Harassment Policy																	
Temporary (Staffing Agency) Employee Records																	Retain in the same manner and for the same duration as Employee Records
Training Records																	
Union/Collective Bargaining Agreements	x																
Union Grievances																	
Unclaimed wages records																	
Wage and salary surveys					x												
Purchase and Procurement																	
Investment Recovery - sale of assets																	plus review by Legal Dept. prior to destruction
Price lists(competitive market indices/market data)																	current plus 2 previous lists
Purchase Order files, including RFQs, requisitions, specifications, supplier acknowledgments, correspondence, purchase orders, schedule agreements, vendor & material masters																	6 years after termination of contract or relationship with vendor, or 10 years after origination, whichever comes first
Purchase and work orders																	
Sales tax exemption certificates to and from vendors	x																should be updated every six years
Exemption certificates	x																
Safety																	

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference				
		<1	1	2	3	4	5	6	7	10	20	25	30						
Environmental compliance records and reports for the following programs: air; stormwater; spill prevention, control, and countermeasures; wastewater; and SARA Title III Reporting (excluding hazardous waste, source test and permit application records).	x																		
Environmental permits and associated permit applications		current only																	
Source test records required by air permits	x																		Contact EHS
Sales and Marketing																			
Advertising and promotional payments and rebates								x											
Advertising copy and marketing programs					x														
Catalogs, price lists, etc.															x				
Consumer complaints, recommendations and comments					x														
Customer sales information					x														
Customer service records											x								
Forecasts & strategies for products, markets, customers, etc.					x														
Market & advertising research projects					x														
Orders, customer correspondence files, customer contact reports and sales personnel reports					x														
Packaging materials and product instructions									x		after superseded								
Returned goods records									x										
Tax Records																			
Appraisals - plants and office locations											x	fr yr of appraisal							
Deeds, easements, rights of way	x																		
Excise tax										x									
Gasoline, Motor Fuel & Lubricating Oils tax return records										x									
Payroll tax records										x									
Plots, plans and surveys	x																		
Sales and use tax records										x									
Exemption certificates	x																		
Tax returns (income, franchise, property)	x																		Yes
Tax bills, receipts and statements											x								
Tax worksheets and papers											x	or open years, whichever is longer							
Title policies and title reports	x																		
Employment tax records (including FICA and unemployment taxes)											x								26 CFR 31.6001 - 4 yrs after tax paid/owed or claim made

**Greif, Inc. and U.S. Subsidiaries
Records Retention Master Schedule**

CATEGORY	Permanent	Number of Years Records To Be Retained												Vital Record	Comments/Reference
		<1	1	2	3	4	5	6	7	10	20	25	30		
Traffic and Transportation															
Bills of lading, waybills							x							after delivery	
Freight bills								x						plus current yr	
Highway permits				x										after superseded	
Leases for shipping, storage and transportation equipment														life of equipment + 3 years	
Receiving Reports										x					
Shipping claims								x						after settlement	
Shipping notices								x						after settlement	
Third party tariff schedules				x										after superseded	
Equipment maintenance & inspection					x									after disposal of equipment	
Driver's logs (hours of service)					x										
Drug & alcohol testing records										x				after termination	
IRP files										x					
IFTA files								x							
Driver qualification files					x									after termination	
Packing slips for product shipped						x								after delivery	
Transportation equipment and fixtures records - owned and leased property														life of equipment + 3 years	