

Policy Name

Employee Time Reporting

Effective Date

January 1, 2010

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**This policy applies to**

Wolters Kluwer United States Inc. and all of its related subsidiaries, and their subsidiaries and divisions, including customer and business units (collectively "Wolters Kluwer" or the "Company"). It applies to all employees during their employment with the Company.

**Purpose of this policy**

This policy provides specific guidance to all interested parties reporting time for payment. It is concerned with the requirement to report time and the process of reporting time.

**Definitions**

EDTC is Employee Daily Time Collection, the Company's time collection data base application.

**Exempt employees** are salaried employees whose salary is intended to compensate the employee for all hours worked for the Company. Exempt employees may approve their own time records and are not eligible for compensation for hours worked beyond standard (overtime).

**Exception time** is time other than standard scheduled hours such as benefit time or additional hours worked.

**Non-exempt employees** are eligible to receive premium pay, normally one-and-one-half times the regular rate of pay (1.5X) for hours worked in excess of 40 in any one pay week.

**Non-worked time** is benefit time such as paid-time off (PTO), jury duty, or bereavement.

**Timekeeper** is an employee, usually a supervisor or manager, to whom another employee reports. Non-management timekeepers may be designated for a group by the group's manager. Non-exempt employees may act as timekeepers, however, non-exempt employees may not approve their own time. Contingent or temporary employees may not act as timekeepers.

**Worked time** is hours worked plus company-designated holidays such as Independence Day.

### **Scope of this Policy**

It is the policy of Wolters Kluwer that all employees shall be accurately compensated and that such compensation shall be in compliance with both federal and state wage and hour laws. Employees are expected to:

1. Comply with the Company Employee Time Reporting Policy.
2. Comply with all Company Overtime and Benefit Time policies.
3. Report all compensable overtime and benefit time promptly and accurately.
4. When designated as timekeepers, approve time records promptly.

### **Non-exempt Employee Reporting Requirements**

Non-exempt employees are required to document their time on a weekly basis. The documentation must include both worked and non-worked time each day, and must be password-signed and date-stamped by both the employee and his or her timekeeper. An acknowledgment by the employee that all mandated meal and rest periods have been provided is required each week. The acknowledgment is waived if the employee is using the punch-time method.

### **Exempt Employee Reporting Requirements**

Exempt employees are required to document their non-worked time on an as-used basis. The documentation must record non-worked time on scheduled work days, and must be password-signed and date-stamped by both the employee and his or her timekeeper. Managers may authorize their exempt employees to self-approve benefit time.

### **Reporting Method**

All time is reported weekly through the Company's EDTC system. EDTC provides employees both standard timesheet and punch-time options which incorporate Federal, State, and Company time rules and regulations. Time entries must be

approved no later than 5:00 PM local California time every Monday. Special deadlines may be placed for holiday periods. Unapproved entries are not processed by Payroll Services.

### **Records Retention**

All time records are retained for a minimum of three (3) calendar years. Retained records shall be both easy to retrieve and easy to read.

### **Record Audit**

Time records are subject to audit at any time by both Company audit teams, as well as Federal and State entities. Payroll Services reviews unapproved EDTC time records and notifies timekeepers each week. Every three months, Payroll Services will review the current year for unapproved time records and advise timekeepers of needed corrections. Time records remaining unapproved after two quarterly notices sent to timekeepers will be forwarded to next-level management for resolution.

### **Responsibility for the enforcement of this policy**

The Company's Payroll Services Department is responsible for enforcing this policy. Any questions regarding the application of this policy should be directed to the Director of Payroll Services for review and resolution.

### **General statement**

As with all policies and procedures, the Company reserves the right to modify, revise, discontinue or terminate this policy at any time without prior notice.