

REXNORD TIMEKEEPING BIOMETRIC DATA POLICY

Rexnord LLC (the “Company”) is committed to all employees being paid accurately and on-time. To accomplish this purpose, the Company has implemented a state of the art timekeeping system at certain facilities in order to collect hours worked by employees. The Company has partnered with a leading third-party vendor to provide technology to efficiently and easily collect and/or store data for this purpose.

Rather than solely punching a timecard, or scanning an ID badge, an employee will “log” into the system by entering their employee ID number followed by using finger scan technology. This technology does not actually collect or store fingerprints. Instead, the system measures certain biometric aspects of an employee’s fingertip. Those fingertip biometric data points are immediately converted through a proprietary software program to a unique mathematical representation of that data, which is encrypted and saved in a template. No optical image of a finger scan is kept. Each time an employee clocks in for work, a new finger scan will be provided and the template from that scan will be compared with the template assigned to the employee’s personalized ID number to verify the identity of the employee.

Employees of the Company will be required to consent as a condition of employment to the Company’s (and its selected timekeeping and storage vendor’s) capture, collection and storage of biometric data from the finger scan technology for timekeeping purposes. However, the Company will consider requests by employees for accommodation or exemption in whole or in part from the procedures set forth in this Rexnord Timekeeping Biometric Data Policy and/or the use by the Company of finger scan technology and biometric data for verification of employees’ identities. Prior to giving consent, employees should read this Rexnord Timekeeping Biometric Data Policy, which will be presented to employees upon employment and enrollment into the system, and which is also available at any time through Human Resources, including the Human Resources’ website.

The Company understands that in today’s world, people may be concerned about the security of their personal information. With this in mind, the Company has carefully selected a vendor that shares the Company’s commitment to protecting confidential and sensitive information. The Company, and its vendor, will store, transmit, and protect from disclosure, all biometric data obtained through the finger scan technology using the reasonable standard of care within the industry. The Company’s commitment to employees is that this data will be protected to the same level as any other confidential and sensitive information.

During an employee’s employment, the biometric data from the timekeeping system, which is stored by the vendor, is not accessible by any Company representative or by any in-company technology system. Due to the technology used, the biometric data, or template, that is stored by the vendor is virtually impossible to restore to the original scan of the finger. Furthermore, the Company and its vendor will not sell, lease, trade, or otherwise profit from an employee’s biometric data. The Company will not, and the Company’s vendor has assured the Company that it will not, disclose or otherwise disseminate an employee’s biometric data without an employee’s consent unless required by any state or federal law, municipal ordinance, valid warrant, or valid subpoena.

Any employee biometric data collected will be retained by the Company and its vendor for not longer than 1 year after the employee's last use of the system or 1 year after termination of employment, whichever is sooner – provided that the current timekeeping system is maintained, or for a different time period if required by law. The Company and its vendor will permanently destroy an employee's biometric data upon expiration of the aforesaid time periods.

This policy is intended to comply with all federal, state, and local laws, and will be interpreted and applied in order to comply with all applicable laws, including but not limited to, the Illinois Biometric Information Privacy Act.

Any legal disputes, claims, controversies or disagreements arising out of or relating to this Rexnord Timekeeping Biometric Data Policy or the Company's procedure relating to an employee's biometric data ("Claim") shall be resolved by binding arbitration instead of the courts. All Claims may be brought only in the employee's individual capacity, and not as Plaintiff, claimant or class member in a class, collective or other representative or joint proceeding. Arbitration is the exclusive form for the resolution of such Claims, and both the Company and employees mutually waive their respective right to a trial before a judge or jury in federal or state court. The binding arbitration will be administered by the American Arbitration Association ("AAA") in accordance with its rules and procedures then in effect, and shall be confidential.

If any provision of this Rexnord Timekeeping Biometric Data Policy or any part thereof contravenes any law, or if the operation of any provision hereof is determined by law or otherwise to be unenforceable, then such offending provision or part thereof shall be severed and the remaining provisions given full force and effect.

If you have any questions about this policy, including how the finger scan technology works, how the finger scan technology is used, or how the timekeeping system interfaces with the payroll process, please contact your facility Human Resources Manager or the Corporate HRIS Manager.

Informed Written Consent for the Capture, Collection, Storage, and Use of Biometric Data

Rexnord LLC (the “Company”), as set forth in the Rexnord Timekeeping Biometric Data Policy which has been provided herewith, utilizes a timekeeping system that uses, in part, biometric data in the form of templates derived from employees’ finger scans. At no point are employees’ actual fingertip images stored, and the finger scans are completely discarded after the templates are created. The templates are then stored in a secure database and used to verify employee’s identities upon arrival at the place of work.

Prior to participating in the Company’s use of biometric data, please take notice of the following:

1. It is possible that the scan of your fingertips, and the templates derived therefrom, may be subject to provisions of the Illinois Biometric Information Privacy Act or similar laws;
2. Your employment at the Company will involve the scan of your fingertip and storage of the templates derived therefrom;
3. The templates derived from your finger scans will be captured, collected, stored, and used for the duration of your employment, but in no event longer than 1 year after your last interaction with the system or 1 year after your termination of employment with the Company, whichever is sooner, unless otherwise required by law, and will be permanently destroyed upon the expiration of the aforesaid time periods; and
4. The templates derived from your finger scans will be captured, collected, stored, and used for the specific purpose of verifying your identity.

Having read the above and the Rexnord Timekeeping Biometric Data Policy, I agree to the following:

1. The templates or biometric data derived from my finger scans may be captured, collected, used, and stored for the duration of my employment, but in no event longer than 1 year after my last interaction with the system or 1 year after the termination of my employment with the Company, whichever is sooner, unless otherwise required by law;
2. The templates or biometric data derived from my finger scans will be captured, collected, used, and stored for the specific purpose of verifying my identity; and

3. By signing this document, I am providing the Company and its vendor with a legally effective written release (i.e., informed written consent) to capture, collect, store, and use the templates or biometric data derived from my finger scans as described in the Rexnord Timekeeping and Biometric Data Policy.

EMPLOYEE'S SIGNATURE

DATE

EMPLOYEE'S NAME (Please Print)