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DOCUMENT RETENTION AND DESTRUCTION POLICY

1. Policy Statement. _____ (the "Organization") generates and receives a large volume of documents as a result of its daily operations. The law requires the Organization to maintain certain types of records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject the Organization to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, or seriously disadvantage the Organization in litigation. The Organization desires to manage those records in a professional and responsible manner that allows for efficient retrieval, and reasonable storage of those documents necessary to its operation. As a result, the Organization has adopted this Document Retention and Destruction Policy to provide guidelines for the retention and destruction of the Organization's records. This Policy identifies the record retention responsibilities of staff, volunteers, members of the Board of Directors, and outsiders for maintaining and documenting the storage and destruction of the Organization's documents and records.

2. Application of Guidelines.

(a) In General. It is the responsibility of the Executive Director or other chief executive officer ("Executive") to ensure that the Organization complies with this Policy and the procedures set forth herein, including the following:

- (i) Ensure safe and adequate storage of all records;
- (ii) Maintain adherence to the retention provisions contained in the attached Record Retention Schedule (Attachment A);
- (iii) Supervise the destruction of unnecessary records pursuant to this policy and the Record Retention Schedule; and
- (iv) Ensure that the Organization's system for electronic records is covered by backup and archiving procedures for documents and that the Organization conducts an annual check-up of the reliability of the system.

(b) Document Destruction. Under the direction of the Executive, the Organization shall conduct, at least annually, a formal files purging process. During, or

as a result of this process, records which have exceeded the period of their immediate use are to be reviewed and destroyed. In addition, unnecessary duplicate and multiple copies of records are to be identified and destroyed. Whenever possible, the official record is the record that furnishes the most conclusive information, and shall not contain personal notations, other than the author's signature.

(c) Periodic Review. Each employee and director is responsible for reviewing his or her files on a periodic basis to make sure that their records have been retained or discarded in accordance with this Policy. This process should include review of all records and all "working copies" which are no longer of any use to the individual maintaining that material. Working copies of records that are made for the use of other Organization personnel are "non-record" material and should be disposed of when they are no longer of any use. The original of all working copies shall be maintained by the appropriate department in accordance with the Record Retention Schedule.

ATTACHMENT A
TERMS FOR RETENTION

<i>Financial records</i> – Audited financial statements, attorney contingent liability letters	Permanently
<i>Intellectual property records</i> – Copyright and trademark registrations and samples of protected works	Permanently
<i>Tax records</i> – Filed state and federal tax returns/reports and supporting records, tax exemption determination letter and related correspondence, files related to tax audits	Permanently
<i>Governance records</i> – Charter and amendments, Bylaws, other organizational documents, governing board and board committee minutes	Permanently
<i>Government relations records</i> – State and federal lobbying and political contribution reports and supporting records	Ten years
<i>Pension and benefit records</i> -- Pension (ERISA) plan participant/beneficiary records, actuarial reports, related correspondence with government agencies, and supporting records	Ten years
<i>Lease, insurance, and contract/license records</i> – Software license agreements, vendor, hotel, and service agreements, independent contractor agreements, employment agreements, consultant agreements, and all other agreements (retain during the term of the agreement and for five years after the termination, expiration, non-renewal of each agreement)	Five years
<i>Employee/employment records</i> – Employee names, addresses, social security numbers, dates of birth, INS Form I-9, resume/application materials, job descriptions, dates of hire and termination/separation, evaluations, compensation information, promotions, transfers, disciplinary matters, time/payroll records, leave/comp time/FMLA, engagement and discharge correspondence, documentation of basis for independent contractor status (retain for all current employees and independent contractors and for five years after departure of each individual)	Five years
<i>All other electronic records, documents and files</i> – Correspondence files, past budgets, bank statements, publications, employee manuals/policies and procedures, survey information	Three years

Exceptions to these rules and terms for retention may be granted only by the Organization's Executive.

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