



RECORDS MANAGEMENT AND RETENTION POLICY

ARTICLE I. INTRODUCTION

Section 1. Operation Courage is Beautiful (“OCIB”) requires its directors, officers, employees, volunteers, agents and other personnel to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this Records Management and Retention Policy (“Policy”) is to ensure that all Records necessary for business and compliance reasons will be retained for a period of time that will reasonably assure their availability when needed, but for no period of time longer than reasonably necessary. This Policy is intended to supplement but not replace any state and federal laws governing the destruction of documents and records applicable to nonprofit and charitable organizations.

Section 2. It is the policy of OCIB to retain and manage all Records in accordance with uniform guidelines, practices, and procedures. All OCIB directors, officers, employees, volunteers, agents and other personnel (all such persons are referred to in this Policy as “OCIB personnel”) shall manage, protect, and maintain all Records in accordance with the Retention Schedule (attached as Schedule 1) and this Policy.

Section 3. “Records” means all documents, files, or records created by any OCIB personnel while acting within the course and scope of his or her duties pertaining to OCIB business or operations, including but not limited to: computer records, electronic mail (“e-mail”), voice mail messages, handwritings, photographs, photocopies, or facsimile, regardless of the manner in which the record has been stored.

Section 4. All Records required to be retained to document OCIB’s legal compliance, or otherwise required by law, rule or regulation to be retained, shall be retained for the periods required by law as described in the Retention Schedule. All Records required to be retained due to pending or threatened litigation or investigation shall be retained for so long as the litigation or investigation is active, plus any additional tail period as may be provided for in this Policy and the Retention Schedule.

ARTICLE II. SCOPE

Section 1. All Records pertaining to OCIB business maintained or created by any OCIB personnel, including any Records retained off OCIB property, are subject to the requirements of this Policy. The format of Records to be retained may vary, e.g., hard copy original, photocopy, facsimile, microfilm, microfiche, computer file, e-mail, computerized image. Regardless of the format selected, Records must be safeguarded and easily accessible.

In addition to paper Records, this Policy applies to all electronic Records, including Records created or maintained by OCIB personnel remotely, such as on home personal computers or laptops.

Section 2. To the extent possible, the Record retention guidelines contained in this Policy should apply to all applicable Records created, maintained, stored, or otherwise in the possession of OCIB's third party vendors.

ARTICLE III. ADMINISTRATION

Section 1. This Policy is to be administered by the Secretary of the Board of OCIB.

Section 2. Guidelines for retention of Records are provided for in the Retention Schedule. Any changes to the Retention Schedule must be approved by the President of the Board of OCIB.

Section 3. Records kept on-site should be destroyed in accordance with the Retention Schedule. Records that are sent off-site shall be labeled with a destruction date.

Each year, the Secretary of the Board of OCIB will review a list of all Records that have reached the destruction date, and will confirm that the Records can be destroyed, to ensure OCIB's continued ability to produce Records for known investigations or litigation.

If OCIB uses an outside vendor for storage and/or destruction of Records, after approval for destruction, the Records storage vendor shall shred or otherwise destroy the noted Records and provide a certificate of destruction in accordance with this Policy.

Destruction of electronic Records shall utilize a method to ensure the electronic

Records are completely destroyed and not retrievable from any storage media.

Section 4. Any changes to this Policy must be approved by OCIB's Board of Directors. Changes will be distributed to relevant OCIB personnel.

Retention Schedule

Type of Document	Retention period
Accounts payable ledgers and schedules	7 years
Audit reports	Permanently
Bank reconciliations	7 years
Bank statements	7 years
Checks (for important payments and purchases)	Permanently
Contracts, mortgages, notes, and leases (expired)	7 years
Contracts (still in effect)	Contract period
Correspondence (general)	7 years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	7 years
Deeds, mortgages, and bills of sale	Permanently
Determination letter for income tax exemption	Permanently
Depreciation schedules	Permanently
Duplicate deposit slips	2 years
Employment applications	3 years
Expense analyses/expense distribution schedules	7 years
Year-end financial statements	Permanently
Insurance records, current accident reports, claims, policies, and so on (active and expired)	Permanently
Internal audit reports	3 years
Inventory records for products, materials, and supplies	3 years
Invoices (to customers, from vendors)	7 years
Minute books, bylaws, and charter	Permanently
Patents and related papers	Permanently
Payroll records and summaries	7 years
Personnel files (terminated employees)	7 years
Retirement and pension records	Permanently
Tax returns and worksheets	Permanently
Timesheets	7 years
Trademark registrations and copyrights	Permanently
Withholding tax statements	7 years