

# **RECORD RETENTION POLICY**

#### PURPOSE

The purpose of this Record Retention Policy is to ensure that the necessary records and documents of the Company are adequately protected and maintained in accordance with the requirements of all applicable laws and in accordance with the Company's requirements for internal and/or historical reference. This Policy is to ensure that records no longer required by law or by the Company are discarded at the proper time and in the proper manner. In no case shall records be destroyed before the recommended retention period or before legal requirements are met.

The information listed on the Record Retention Schedule attached as Exhibit A is intended as a guideline. Questions regarding the retention of a document that is not described in this chart should be directed to the Executive Director or Corporate Secretary.

#### **RECORDS HOLD ORDER**

Upon notice of potential or actual litigation, government investigation or audit, an authorized office will issue a records hold order. A *Notice to Preserve Information* will be presented to the board to retain records related to the matter. Authorized officers include the Executive Director, Assistant Executive Director and/or Chief Operating Officer. A records hold order takes precedence over the Record Retention Schedule. No records will be destroyed following the issuance of a hold order until the hold order is withdrawn.

### **RECORDS DESTRUCTION**

Annually, after each fiscal year-end or such other periodic date designated in the Record Retention Schedule, all records exceeding their designated retention period should be destroyed.

- Paper documents for destruction are to be placed in the onsite shredding bins or destroyed by scheduling an onsite shredding pickup with the appropriate Company vendor.
- Records scheduled for destruction as of fiscal year-end must be destroyed by March 31<sup>st</sup> ( or as soon as possible thereafter) of the following year.



## MATERIALS THAT MAY BE DISPOSED OF WITHOUT A SPECIFIC RETENTION PERIOD

The following materials are considered to have no administrative, legal, financial or historic requirements for their retention. They may be disposed of as soon as they have served their reference purpose.

- **Duplicates-** Extra copies of correspondence, reports, hardcopy printouts from a database, electronic files extracted from a master file or database, mailing lists, etc., used for only for refence or informational distribution.
- **Document Errors-** Incorrect versions of documents, forms, or reports that were regenerated in order to correct errors in typing, data entry, spelling, grammar, or format.
- **Miscellaneous Notices or Memoranda-**Memos and postings that do not relate to the functional responsibility of the Company (i.e., announcements of meetings, reservations, confirmations, itineraries, acknowledgments, thank-you notes, etc.).
- **Preliminary Drafts-** Drafts of memos, letters, reports, worksheets, etc., that represent stylistic, spelling, or grammatical changes.
- **Published Reference Materials-** Printed materials received from non-Company sources that require no action and are not needed for documentation. These may include technical reports and studies, magazines, announcements, newsletters, etc.
- **Request for Information-** Routine memos or forms used to request, or respond to requests for, information, forms, mailing lists, database printouts, publications, etc. These should only be retained until after the requested information has been sent or received.
- **Transmittal Memos-** Letters and fax cover sheets that do not add any substantive information to the transmitted material.