

**WASHINGTON AREA HUMANE SOCIETY
RECORD RETENTION AND DESTRUCTION POLICY**

The records of the Washington Area Humane Society (the “Society”) are important assets. Numerous records (including reports, letters, e-mails, forms, and other kinds of documents) are produced internally on a daily basis. As such, the Society hereby adopts this Record Retention and Destruction Policy to set forth procedures for the retention and destruction of the Society’s records.

A. Definition of “Record”

As used in the Policy, the term “records” refers to all documents and recorded information, regardless of media or characteristics, made or received and maintained by the Society in pursuance of its legal obligations or in the transaction of its business. The term refers not only to written documents and e-mail in paper or electronic formats, but also records maintained on microfilm, optical disc, magnetic tape, dvr, or any other media. The term includes records that are kept in “official” or centralized locations as well as those records that are kept in individual files.

B. General Instructions

Certain laws require the Society to maintain various types of records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject the Society to penalties and fines, cause the loss of rights, spoil potential evidence in a lawsuit or otherwise disadvantage the Society.

As a general rule, only one copy of a record should be retained unless the record is genuinely needed by more than one employee. If identical records are received by different employees, appropriate management personnel should make a decision as to which set of copies will be retained and which set of copies will be destroyed.

If a record pertains to two or more subjects and fits under two or more schedules and time periods, the longest retention period shall be used.

All employees of the Society shall, to fully comply with this Records Retention and Destruction Policy and the attached Schedule, adhere to the following general exception to any stated destruction schedule: If you believe, or the Society informs you, that records are relevant to litigation, or potential litigation (*i.e.*, a dispute that could result in litigation), you must preserve those records until you receive further instruction. This exception supersedes any previously or subsequently established destruction schedule for those records. If you believe that this exception may apply, or have any question regarding the possible applicability of that exception, please contact the Secretary of the Board.

From time to time, the Society may amend this Record Retention or Destruction Policy or attached Schedule for specific categories of records in order to ensure legal compliance and also

to accomplish other objectives, such as cost management. Several categories of documents that bear special consideration are identified below. Although minimum retention periods are suggested, the retention of the records identified below on the attached Schedule and of records not included in the identified categories should be determined primarily by the application of the general guidelines affecting record retention identified above, as well as any other pertinent factors.

(a) Tax Records. Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Society's revenues and expenses. Tax records should be retained for at least seven years from the date of filing the applicable return unless otherwise provided.

(b) Employment Records/Personnel Records. The Society is to keep recruitment, employment, and personnel information. The Society should also keep personnel files that reflect performance reviews and any complaints brought against the Society or individual employees. The Society should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file. Employment and personnel records should be retained for seven years unless otherwise provided.

(c) Board and Board Committee Materials. Meeting minutes should be retained in perpetuity in the Society's minute book. A clean copy of all board and board committee materials should be retained for no less than four years unless otherwise provided.

(d) Press Releases/Public Filings. The Society should retain copies of all press releases and publicly filed documents under the theory that the Society should have its own copy to test the accuracy of any document a member of the public can theoretically produce against the Society. These records should be retained for four years unless otherwise provided.

(e) Sales Documents. The Society should keep final copies of sales documents for the same period of time it keeps other corporate files, generally four years.

(f) Contracts. Final, execution copies of all contracts entered into by the Society should be retained. The Society should retain copies of the final contracts for at least four years beyond the life of the contract.

(g) Electronic Mail. E-mail that needs to be saved should be either (i) printed in hard copy and kept in the appropriate file; or (ii) downloaded to a computer file and kept electronically or on disk as a separate file. The retention period depends upon the subject matter of the e-mail, as covered elsewhere in this Policy.

Failure to comply with this Record Retention and Destruction Policy and/or the attached Schedule, which is incorporated herein, may result in appropriate action being taken against the employee, including suspension or termination. Questions about this Policy should be referred

to the Secretary of the Board who is in charge of administering, enforcing, and updating this Policy.

Read, understood, and agreed:

Employee's Signature

Date

Record Retention and Destruction Schedule

Corporate Records

| | |
|---|-----------|
| Articles of Incorporation and any Amendments | Permanent |
| IRS Form 1023 | Permanent |
| IRS Determination Letter | Permanent |
| By-Laws | Permanent |
| Board policies, unless amended | Permanent |
| Resolutions | Permanent |
| Board meeting minutes | Permanent |
| Sales tax exemption documents | Permanent |
| Tax or employee identification number designation | Permanent |
| Annual state corporate filings of any sort | Permanent |
| Charitable solicitation registrations | Permanent |
| Correspondence, general | 4 years |
| Internal Reports, miscellaneous | 4 years |

Animal Records

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| Euthanasia Records | 4 years |
| Adoption Records | 4 years |
| Other | 4 years |

Financial Records

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| Chart of Accounts | Permanent |
| Fiscal Policies and Procedures | Permanent |
| Audit reports of accountants | Permanent |
| Financial statements | Permanent |
| General Ledgers and end of year statements | Permanent |
| Depreciation Schedules | Permanent |
| Accounts Payable ledgers and schedules | 10 years |
| Account Receivable ledgers and schedules | 10 years |
| Bank Statements | 10 years |
| Check registers/books | 7 years |
| Business expenses documents | 7 years |
| Bank deposit slips | 7 years |
| Cancelled checks (with exception below) | 7 years |
| Checks (canceled, for important payments; i.e., taxes, purchase of property, special contracts, etc. [checks should be filed with the papers pertaining to the underlying transaction]) | 7 years |
| Invoices | 7 years |
| Investment records | 7 years |
| Property/asset inventories | 7 years |
| Petty cash receipts/documents | 4 years |
| Credit card receipts | 4 years |

Tax Records

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|--------------------------|-----------|
| IRS Form 990s | Permanent |
| IRS From 1099s | Permanent |
| Payroll registers | Permanent |
| Payroll tax withholdings | 7 years |
| Earnings records | 7 years |
| Payroll tax returns | 7 years |
| W-2 statements | 7 years |

Personnel Records

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| Employee offer letters | 7 years after termination/departure |
| Employment acceptance letters | 7 years after termination/departure |
| Employment Contracts | 7 years after termination/departure |
| Benefits descriptions per employee | 7 years after termination/departure |
| Pension records | 7 years after termination/departure |
| Employee applications and resumes (hired) | 7 years after termination/departure |
| Employee applications and resumes (not hired) | 4 years |
| Promotions, demotions, letter of reprimand, termination | 7 years after termination/departure |
| Job descriptions, performance goals | 7 years after termination/departure |
| Workers' Compensation records | 7 years |
| Salary ranges per job description | 4 years |
| Time reports | 7 years after termination/departure |
| Volunteer records | 7 years after termination/departure |

Insurance Records

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| Property Insurance policy | Permanent |
| Directors and Officers Insurance policy | Permanent |
| Workers' Compensation Insurance policy | Permanent |
| General Liability Insurance policy | Permanent |
| Insurance claims applications | Permanent |
| Insurance disbursements / denials | Permanent |

Contracts and Other Legal Documents

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| Construction contracts | Permanent |
| Loan / mortgage contracts | 7 years after satisfaction of all obligations |
| Leases | 7 years after termination |
| Vendor contracts | 7 years after expiration |
| Warranties | 7 years after expiration |

Donations / Funding Records

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| Donation records of endowment funds and of significant restricted funds | Permanent |
| Donation records, other | 7 years |
| Grant applications and contracts | 7 years after completion |

Management Plans and Procedures

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| Strategic Plans | 7 years |
| Staffing, programs, marketing, finance, fundraising and evaluation plans | 7 years |
| Disaster Recovery Plan | 7 years |