

RECORD RETENTION AND DESTRUCTION POLICY

1) Policy

This Policy represents the International Messengers' policy regarding the retention and disposal of records and electronic documents.

2) Administration

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of International Messengers. The Chief Financial Officer is the officer in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule for physical records is followed. The Administrator is also authorized to: make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with local, state and federal laws and includes the appropriate document and record categories for International Messengers; monitor local, state and federal laws affecting record retention; annually review the record retention and disposal program; and monitor compliance with this Policy.

The Policy for the retention and disposal of electronic documents as set out in Appendix A section H is the responsibility of the individual employee.

3) Suspension of Record Disposal In Event of Litigation or Claims

In the event International Messengers is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning International Messengers or the commencement of any litigation against or concerning International Messengers, such employee shall inform the Administrator and any further disposal of documents shall be suspended until such time as the Administrator, with the advice of counsel, determines otherwise. The Administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

4) Applicability

This Policy applies to all physical records generated in the course of International Messengers' operation, including both original documents and reproductions. It also applies to the electronic documents described above.

This Policy was approved by the Board of Directors of International Messengers on April 21, 2012.

Appendix A – Record Retention Schedule

The Record Retention Schedule is organized as follows:

SECTION TOPIC

- A. Accounting, Payroll and Finance
- B. Contracts
- C. Contribution Records
- D. Corporate Records
- E. Personnel Records
- F. Property Records
- G. Tax Records
- H. Electronic Documents

A. ACCOUNTING, PAYROLL AND FINANCE

<u>Record Type</u>	<u>Retention Period</u>
Accounts Payable Request and Supporting Documentation	7 years after completion of audit
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Bank Statements and Canceled Checks	7 years after completion of audit
Checks from Donors/Vendors (remote deposit)	7 days after clearing
Employee Expense Reports	7 years after completion of audit
Investment Records	7 years after expiration or termination
W-2 Forms	7 years after completion of audit
Payroll Registers (gross and net) with Related Supporting Documentation and Time Sheets	7 years after completion of audit

B. CONTRACTS

<u>Record Type</u>	<u>Retention Period</u>
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination

C. CONTRIBUTION RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Records of Contributions	7 years
Documents evidencing terms, conditions or restrictions on gifts	7 years after funds are expended

D. CORPORATE RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Corporate Records (minute books, signed minutes of the Board and all committees, corporate seals, articles of incorporation, bylaws, annual corporate reports)	Permanent

E. PERSONNEL RECORDS

<u>Record Type (Kept in Personnel File)</u>	<u>Retention Period</u>
Employment Contracts and Other Pay Authorization	Termination + 7 years
Employee Deduction Authorizations (W-4)	Termination + 7 years
Payroll Deductions	Termination + 7 years
Forms I-9	3 years after hiring, or 1 year after separation if later

F. PROPERTY RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
Property Insurance Policies	Permanent

G. TAX RECORDS

<u>Record Type</u>	<u>Retention Period</u>
Tax-Exemption Documents and Related Correspondence	Permanent
IRS Rulings	Permanent
Payroll Tax Records	7 years
Tax Bills, Receipts, Statements	7 years
Sales/Use Tax Records	7 years
Annual Information Returns - Federal and State	Permanent
IRS or other Government Audit Records	Permanent

H. ELECTRONIC DOCUMENTS

- 1. Electronic Mail:** Not all email needs to be retained, depending on the subject matter.
 - Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.
 - Staff will not store or transfer International Messengers-related e-mail on non-work-related computers except as necessary or appropriate for International Messengers purposes.
 - Staff will take care not to send confidential/proprietary International Messengers information to outside sources.
 - Any e-mail staff deems vital to the performance of their job should be copied to the staff's Y: drive folder, and printed and stored in the employee's workspace.
- 2. Electronic Documents:** including Microsoft Office Suite and PDF files. Retention depends on the subject matter.