

Record Retention Policy

The Organization takes seriously its obligations to preserve information relating to litigation, audits and investigations. The Sarbanes-Oxley Act makes it a crime to alter, cover up falsify, or destroy any document to prevent its use in an official proceeding. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the Organization and its employees and possible disciplinary action against responsible individuals (up to and including termination of employment). Each employee has an obligation to contact the President of the Board of Directors or the Executive Director of a potential or actual litigation, external audit, investigation or similar proceeding involving the Organization. The information listed in the retention schedule listed below is intended as a guideline and may not contain all the records the Organization may be required to keep in the future. Questions regarding the retention of documents not listed in this chart should be directed to the President of the Board of Directors.

From time to time the President of the Board of Directors or Executive Director may issue a notice, known as a "Legal Hold," suspending the destruction of records due to pending, threatened or otherwise reasonably foreseeable litigation, audits, government investigations or similar proceedings. No records specified in any Legal Hold may be destroyed, even if the scheduled destruction date has passed, until the Legal Hold is withdrawn in writing by the President of the Board of Directors or Executive Director.

| File Category | Item | Retention Period | |
|--------------------------|-----------------------------------------|-------------------------|--|
| Corporate Records | Bylaws and Articles of Incorporation | Permanent | |
| | Corporate Resolutions | Permanent | |
| | Board and committee meeting agendas and | | |
| | minutes | Permanent | |
| | Conflict of Interest disclosure forms | 7 years | |
| Finance and | | | |
| Administration | Accounts payable ledger | 7 years | |
| | Auditor management letters | Permanent | |

| File Category | Item | Retention Period | |
|-------------------|------------------------------------------------|-------------------|--|
| | Bank deposits and statements | 7 years | |
| | Charitable organizations registration | | |
| | statements (filed with Florida Attorney | | |
| | General) | 7 years | |
| | Chart of accounts | 7 years | |
| | Check register and checks | 7 years | |
| | | 7 years after all | |
| | Contracts and agreements | obligations end | |
| | Correspondence – general | 7 years | |
| | | 7 years after | |
| | Equipment files and maintenance records | disposition | |
| | Expense reports | 7 years | |
| | Financial statements (audited) | Permanent | |
| | General ledgers and journals (includes bank | | |
| | reconciliations, fund accounting by month, | | |
| | payouts allocation, securities lending, single | | |
| | fund allocation, trust statements) | 7 years | |
| | Investment performance reports | 7 years | |
| | Investment manager correspondence | 7 years | |
| | | 7 years after all | |
| | Investment manager contracts | obligations end | |
| | Investment consultant reports | 7 years | |
| | Journal entries | 7 years | |
| | Payroll records | Permanent | |
| Insurance Records | Policies – occurrence type | Permanent | |
| | Policies – claims-made type | Permanent | |
| | Accident reports | 7 years | |
| | Fire inspection reports | 7 years | |
| | | 7 years after end | |
| | Group disability records | of benefits | |
| | Safety (OSHA) reports | 7 years | |
| | Claims (after settlement) | 7 years | |
| Real Estate | Deeds | Permanent | |
| | | 7 years after all | |
| | Leases (expired) | obligations end | |

| File Category | Item | Retention Period | |
|----------------------------|------------------------------------------------|--------------------|--|
| | | 7 years after all | |
| | Mortgages, security agreements | obligations end | |
| | | | |
| | | disposition | |
| | Purchase agreements | requirement | |
| | Correspondence with legal counsel or | 7 years after | |
| Tax | accountants, not otherwise listed | return is filed | |
| | IRS exemption determination and related | | |
| | correspondence | Permanent | |
| | IRS form 990s | Permanent | |
| | Timecards | 3 years | |
| | Withholding tax statements | 7 years | |
| | One set kept on site and one set kept off | | |
| Communications | site of all communication documents | | |
| | | Permanent (5 | |
| | Annual reports | copies) | |
| | Other publications | 7 years | |
| | Photos | 7 years | |
| | Press clippings | 7 years | |
| | Press releases | 7 years | |
| | | 7 years after all | |
| Consulting Services | Consulting contracts/filed | obligations end | |
| | Benefits: retirement plans (plan descriptions, | | |
| Human Resources | plan documents) | Permanent | |
| | | 7 years after all | |
| | Employment offer letter | obligations end | |
| | Disability and sick-benefit records | Permanent | |
| | Employment applications | 3 years | |
| | Employee handbooks | Permanent | |
| | | 7 years after use | |
| | Employee orientation and training materials | ends | |
| | Employee personnel files | Permanent | |
| | | 1 year after end | |
| | | of service, or 5 | |
| | IRS Form I-9 (store separate from personnel | years also copy in | |
| | file) | personal file | |

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| File Category | Item | Retention Period | | |
|----------------|------------------------------------------|-------------------|--|--|
| | Résumés | 1 year | | |
| | Workers comp claims (after settlement) | 7 years | | |
| | | 7 years after all | | |
| Technology | Software licenses and support agreements | obligations end | | |
| Library | Other organization's annual reports | 2 years | | |
| | Directories and periodicals | 2 years | | |
| General | Correspondence – president/CEO and | | | |
| Administration | general | 7 years | | |
| | Appointment calendars – president/CEO | 7 years | | |

| By: _ | | | |
|-------|--|--|--|
| | | | |

Venice Art Center Secretary