

DOCUMENT RETENTION

Policy Statement

I. Purpose

This Document Retention and Destruction Policy covers all records and documents, regardless of physical form, and contains guidelines for how long certain documents should be kept and how records should be destroyed. The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records and to facilitate Parasol Tahoe Community Foundation's ("Parasol") operations by promoting efficiency and freeing up storage space.

II. Document Retention

Parasol follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule will be retained for the appropriate length of time.

This policy covers all records and documents, regardless of physical form, including electronic files as well as paper documents. The policy requirements can be satisfied with either a paper version or an electronic version.

The following documents shall be retained permanently by Parasol:

- 1. All corporate documents, including articles of incorporation and bylaws
- 2. Information returns and other filings with federal and state regulatory agencies including tax returns, IRS tax determination letter and related correspondence and sales tax exemption letter
- 3. Minutes of board meetings and board packets (board packets include approved grants)
- 4. Employee handbooks
- 5. Contracts, leases and other legal documents
- 6. Correspondence pertaining to legal and regulatory matters, including but not limited to correspondence with the IRS
- 7. Audited financial statements, management letters from auditors, general ledgers and fixed asset/depreciation records
- 8. Construction and real property documents
- 9. Insurance policies and claim related documents
- 10. Documents pertaining to patents, copyrights, trademarks and other intellectual property rights
- 11. Fund and trust agreements and correspondence related to terms of agreements and terms of gifts
- 12. Communication documents, including annual reports and other publications (a minimum of 6 copies each)
- 13. Documents considered important to the organization or of lasting significance, including emails, hard copy correspondence and internal memoranda

The following documents should be retained for seven years:

- 1. Grant applications, agreements and reporting will be kept for 7 years after the final report.
- 2. Accounting records, including but not limited to: accounts payable, accounts receivable, journal entries, bank and investment statements, reconciliations and deposits
- 3. Personnel records (7 years from last day of employment)
- 4. Payroll records
- 5. Strategic plans and budgets

Hard copy and electronically stored documents, correspondence and internal memoranda related to documents addressed above must be retained for the same period as the document to which they relate.

Documents referenced above are not to be destroyed without first providing the Board or Executive Committee with a list explaining specific natures of documents proposed for destruction, and receiving approval by the Board or Executive Committee for such destruction of documents. The Board or Executive Committee may also approve a scheduled destruction date for documents, and staff is authorized to proceed with destruction on or after the scheduled date. All such Board or Committee authorizations of document destruction or designation of scheduled destruction dates shall be retained in Parasol's permanent records.

The Foundation expects all employees to fully comply with Parasol's records retention and destruction policies and schedules, and with the following general exception to any stated destruction schedule:

If you believe, or the Foundation informs you, that Foundation records are relevant to litigation, potential litigation or a government investigation, then you must preserve those records until the CEO determines the records are no longer needed. The CEO is responsible for the enforcement of legal holds. That exception supersedes any previously or subsequently established destruction schedule for those records. If you believe that exception may apply, or have any questions regarding the possible applicability of that exception, please contact the CEO and Controller.

The Parasol staff is responsible for storage, tracking of document location and access to all documents.

Any violation of this document retention policy will subject to disciplinary action that may include oral or written warnings, disciplinary probation, suspension, demotion or other reassignment of duties, including termination.