

ISRAEL GUIDE DOG CENTER FOR THE BLIND

DOCUMENT RETENTION POLICY AND PROCEDURE

I. OPERATING POLICY

It is the Policy of Israel Guide Dog Center for the Blind (the "Corporation"), as a tax-exempt organization, to comply with all applicable state and Federal laws, including the Sarbanes-Oxley Act (the "Act"). The Act addresses the destruction of business records and documents and turns intentional document destruction into a process that must be carefully monitored.

This Policy is therefore intended as a written, mandatory document retention and periodic destruction policy, to: (a) eliminate accidental or innocent destruction; and (b) serve as a guide for administrative personnel, so that records will be retained in compliance with the Act.

It is the general Policy of the Corporation that records be safeguarded and retained only during the period of their immediate use, unless longer retention is required by applicable law or management and operational needs. The Corporation is adopting this Document Retention Policy and Procedure (the "Policy") to: (1) eliminate the onerous expense of storage of irrelevant and obsolete documents; (2) reduce the time and cost expended retrieving documents in response to business requests and management needs; (3) prevent the improper alteration, destruction, mutilation or concealment of its records; and (4) improve the efficiency of its operations.

This Policy includes requirements regarding the retention of records related to various aspects of the Corporation's operations, including, without limitation, corporate records, human resources/labor relations, tax records and accounting and finance matters.

II. RETENTION AND DISPOSAL PROCEDURE

The Records Retention Schedule included in this Policy sets forth the length of time during which records will be retained and safeguarded. Individuals throughout the Corporation will be responsible for the implementation of this Policy.

At a minimum, at the end of each year all records other than those to be permanently retained should be reviewed. There is no restriction on any department or personnel discarding out-dated records not required to be retained by this Policy throughout the year. The Records Retention Schedule is the guide for determining which documents are retained.

It is important to locate all copies of documents to be destroyed pursuant to this Policy. Included are all forms of the document, whether present in hard copy or in any other media, electronic or otherwise. Copies may be stored in different places within a single location.

If a legal claim, legal action, other proceeding or investigation has arisen or commenced, the President or Executive Director (the "Records Retention Officer") will provide written notice to individuals in possession of potentially relevant documents. No record may be altered, destroyed, mutilated, concealed or falsified where a legal claim, legal action, other proceeding or investigation

has been threatened or commenced. See Section IV, “Suspension of Records Retention Schedule in the Event of a Legal Proceeding,” below.

Adherence to and consistent application of this Policy are critical to its utility and defensibility. While there may be occasions when deviations from this Policy are appropriate, requests to deviate should be forwarded to the Records Retention Officer. In no event should early destruction of documents take place without written authorization from the Records Retention Officer.

III. PROCEDURE FOR AMENDING THE RECORDS RETENTION SCHEDULE

Any employee who feels that the retention period governing certain records should be changed because of changes in legal or contractual requirements or management needs, or who feels that a new item should be added to the schedule, should submit the following information to the Records Retention Officer:

- (i) Departments and locations maintaining the record;
- (ii) Name of record, or simply a brief description if it is a proposed new item on the schedule;
- (iii) Proposed retention period; and
- (iv) Reason for the proposed retention, including an explanation of the need for the record, who uses it, and for what purposes.

IV. SUSPENSION OF RECORDS RETENTION SCHEDULE IN THE EVENT OF A LEGAL PROCEEDING

Upon receipt of service of legal process requiring production of documents, or upon learning of a potential legal proceeding or government inquiry or investigation, the Records Retention Schedule established by this Policy shall be suspended to the extent that any records of the Corporation, including backup tapes, that are related to a legal proceeding, government inquiry or investigation, or any legal summons requiring production of documents might be destroyed or discarded. Records that are related, or could be construed to be related, in any way to any of the foregoing are not to be altered, recorded over, destroyed, mutilated, concealed or falsified, and any exceptions to this rule require the express written approval of the Records Retention Officer.

V. RECORDS RETAINED IN ELECTRONIC FORM

To ensure uniformity and manageability, all records retention policies set out in the Records Retention Schedule will be applied with equal measure to documents retained in electronic or digital form. These records (for example, e-mails) should be retained for the same period as the equivalent materials in printed form. Generally, records may be stored electronically provided that each such record (i) accurately reflects the information set forth in the original record, and (ii) can be obtained/produced easily during the required retention period. Records in an electronic format must be maintained using a process or system capable of reproducing all records on paper. Such records when displayed on a viewer, monitor, or reproduced on paper, must exhibit a high degree of legibility and readability. (For the purpose of this Section V, “legibility” means the quality of a letter or numeral that enables the observer to identify

it positively and quickly, and “readability” means the quality of a group of letters or numerals being recognized as complete words or numbers). This information must be stored in such a manner that none of it may be altered once it is initially recorded without recording all changes, who made them, and when they were made. For processes or systems based on the storage of digital images, the process or system must afford accessibility to all digital images in the records being maintained.

VI. UNAUTHORIZED FILES

To ensure the Corporation’s control of record keeping, all employees are prohibited from maintaining unauthorized files. An unauthorized file is a personal file containing records relating to operations which is maintained outside the ordinary and necessary course of operations.

VII. SCOPE OF POLICY

This Policy applies to all locations and departments of the Corporation, subject to changes necessary to comply with applicable law. The attached Records Retention Schedule does not list every single document which may be found in the Corporation’s files. This Policy will be supplemented and amended based on experience gained in its implementation, and on changes in business practices and legal requirements including, without limitation, requirements of: (i) all applicable Federal and state laws, rules and regulations and/or (ii) court judgments and decrees, consent orders, settlement agreements, licenses and permits, writs and injunctions.

In the case of conflicting policies, the Records Retention Officer should be consulted; generally, the longer retention period will be applied. To the extent that any record retained in files is not specifically included in the Records Retention Schedule, it is the intent and purpose of this Policy to provide general guidelines for the length of time records are to be retained. The Corporation personnel are to consult with the Records Retention Officer when it is unclear as to the length of time a document is to be retained.

VIII. DATE OF ADOPTION

This Policy shall be effective beginning December 16, 2012.

IX. RECORDS RETENTION SCHEDULE

Type of Document	Retention Period
Accounts payable ledgers and schedules	7 years
Audit reports and work papers	Permanently
Bank statements and reconciliations	7 years and/or until all federal and state audit requirements have been met
Checks (for important payments and purchases)	20 years
Contracts and leases (expired)	7 years after expiration
Contracts (still in effect)	Permanently
Correspondence (general)	3 years
Correspondence (legal and important matters)	Permanently

Corporate documents and records, e.g., Articles, Bylaws, Board minutes, policies	Permanently
Deeds, mortgages, notes, and bills of sale	Permanently
Depreciation schedules	While active plus 7 years
Employment applications	3 years
Expense-related items (account payable invoices, vouchers, cash disbursements, expense reports, etc.)	7 years
Insurance policies (expired)	Permanently for “occurrence” policies and 3 years for “claims-made” policies
Insurance policies (current)	Permanently
Injury claims and accident reports	10 years
Internal audit reports	3 years
Inventories of products, materials, and supplies	7 years
Invoices	7 years
Litigation and related matters	10 years after completion or close of matter
Intellectual Property documents, including patents, trademarks, copyrights, and related documentation	Permanently
Payroll records and summaries	7 years
Personnel files (terminated employees)	7 years after termination
Retirement and pension records	Permanently
Tax returns and worksheets	Permanently
Tax records; e.g. sales/use, unemployment, property, social security, worker’s compensation, state income taxes paid	7 years
Timesheets	7 years
Year-end financial statements	Permanently

(Board reaffirmed policy on 12/12/2021)