

SAMARITAN'S FEET INTERNATIONAL

DOCUMENT RETENTION POLICY

General

It is the policy of Samaritan's Feet International (the "Organization") to retain all records (i) required to be retained by law or governmental regulation, or (ii) necessary for the business of the Organization, including historical reference. Because of the significant costs associated with storing, preserving, and reviewing records that the Organization has no duty or need to retain, the Organization may discard or delete records in accordance with the Organization's Record Retention Schedule. The term "records" in this policy refers to all information in the possession of and relating to the Organization's business, whether in paper or electronic format, including e-mail.

Administration and Compliance

The Compliance Officer shall be the officer charged with administering this policy and instituting processes and procedures to ensure that the Record Retention Schedule is followed. The Compliance Officer shall monitor local, state and federal laws affecting record retention, to annually review the record retention and disposal program to ensure that the policy complies with applicable laws, and to monitor the Organization's compliance with this policy. 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.

The Compliance Officer shall be responsible for the ongoing process of identifying records that have met the required retention period as set forth in the Record Retention Schedule and overseeing their destruction periodically and preferably at least annually. Destruction of financial and personnel-related documents shall be accomplished by shredding.

Litigation and Investigations

Documents (including all copies, whether identical or not, and including all electronic and physical copies) relevant or potentially relevant to any dispute that might give rise to litigation, any pending litigation, or any potential or pending governmental investigation must be retained whether or not any such documents fall within the retention categories set forth in this policy, even if (i) such documents are not subject to any subpoena or document request or (ii) the retention period for such documents has expired.

Legal counsel should be consulted promptly about identifying and preserving documents that are relevant or potentially relevant to any dispute that might give rise to litigation, any pending litigation, or any potential or pending governmental investigation.

Electronic Documents and Records

Electronic documents shall be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the Record Retention Schedule shall be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder.

Records Not Addressed

Questions about the retention of records not specifically addressed in this policy should be directed to the Chief Executive Officer.

Adopted 6/13/13

Retention Schedule

Time Period	Document Type	Description	Notes
Permanently	Accounting & Finance	• Annual audit reports and financial statements	
		• General ledgers	
	Contribution Records	• Records of contributions	
		• Documents evidencing terms, conditions, or restrictions on gifts	
	Corporate Records	• Minute books, minutes and meeting materials of the Board and all committees, Board and committee resolutions, corporate seals, articles of incorporation, bylaws, and Board policies and procedures	
		• Licenses and permits	
		• Trademark and other intellectual property records	
	Personnel Documents	• A copy of the employee handbook	
	Property Records	• Correspondence, property deeds, bills of sale, assessments, licenses, rights of way, other documents of title, mortgage documents	
	Insurance Records		
		• Accident reports, claims, and related records and correspondence	
	Tax Records	• Tax-exemption documents and related correspondence	
		• IRS rulings	
		• Annual Information Returns and Tax Returns	
• IRS or other government audit records and correspondences (inc re excise taxes)			
At Least 7 Years	Accounting & Finance	• Accounts payable and accounts receivable ledgers and schedules	
		• Bank statements	
		• Notes receivable ledgers and schedules	
		• Annual audit records, including work papers and other documents that relate to the audit	Retention period begins after completion of audit
	• Investment records, including investment management agreements, portfolio reports, performance reports and related documents	Retention period begins after sale of investment	
	Contracts	• Contracts and related correspondence (including any proposal that resulted in the contract and all other supportive documentation)	Retention period starts after termination/expiration of contract
Payroll Documents	• Payroll registers (gross and net)		

		• Payroll deductions	Retention period starts after separation of employee
		• W-2 and W-4 Forms	Retention period starts after separation of employee
		• Garnishments, assignments, attachments	Retention period starts after separation of employee
	Personnel Documents	• Commissions/bonuses/incentives/awards	Retention period starts after separation of employee
		• Employee earnings records	Retention period starts after separation of employee
		• Individual employment contracts	Retention period starts after separation of employee
		• Employee personnel records (including attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, background and training and qualification records.)	Retention period starts after separation of employee
	Tax Records	• Sales/use tax refund records	
		• Payroll tax records	
		• Tax bills, receipts, statements	
		• Original tax workpaper packages	
At Least 3 years	Personnel Documents	• Job descriptions	Retention period starts from the date the description is superseded
		• Employee expense reports	
		• non-hired applicants (including all application and resumes, whether solicited or unsolicited)	
		• Employee I-9 forms	Retention period is 3 years after hiring, or 1 year after separation of employee, if later
		• Time cards/sheets	