

ARM IN ARM, INC.
POLICY FOR DOCUMENT RETENTION AND DESTRUCTION

Established 12/2013

Revised 4/2017

1. **Purpose:**

The purpose of this policy is to ensure that **Arm In Arm, Inc.** (hereinafter referred to as “Arm In Arm”) manages data in an efficient and effective manner, maintains historical records related to its financial and administrative operations, and purges documents as part of its normal management process in accordance with applicable federal, state, and local laws. By establishing a specific timeline for document purging, this shall also ensure compliance with The Sarbanes-Oxley Act of 2002 (Pub. L. 107-204, 116 Stat. 745 (2002)), which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding.

If any person associated with Arm In Arm becomes aware of any investigation, such person shall immediately notify Arm In Arm so that document purging in accordance with this Policy for Document Retention and Destruction (hereinafter referred to as this “Policy”) will promptly cease and all relevant documents will be appropriately identified and protected.

NOTWITHSTANDING ANY TERM, CONDITION, OR PROVISION OF THIS POLICY, IN THE EVENT THAT THE BOARD, THE EXECUTIVE DIRECTOR, OR LEGAL COUNSEL FOR ARM IN ARM ISSUES A LITIGATION HOLD NOTICE PROVIDING INSTRUCTION REGARDING THE OBLIGATION OF ARM IN ARM TO PRESERVE DOCUMENTS AND INFORMATION PERTAINING TO A SPECIFIC LEGAL MATTER, THE INSTRUCTIONS IN SUCH NOTICE WILL SUPERSEDE THOSE WITHIN THIS POLICY, UNLESS THIS POLICY INSTRUCTS THAT DOCUMENTS SHALL BE PRESERVED LONGER THAN THE LITIGATION HOLD INSTRUCTIONS PROVIDE.

2. **Definitions:**

For the purposes of this Policy, the following terms shall have the following meanings:

- a. “Administrative” means those Documents that are pertinent to the day-to-day operations of Arm In Arm.
- b. “Arm In Arm” shall have the meaning assigned and ascribed to such term in Paragraph 1 hereof.
- c. “Delete” means to delete a Document that is an electronic file.
- d. “Document” means any item listed in the table below, whether such item is a paper hard copy or an electronic file (which electronic files shall include, without limitation, any computer files, video cassettes, compact discs, multi-media files, or e-mails).
- e. “Historic” means Documents that are valuable for maintaining knowledge of the history of Arm In Arm and its work.

- f. “Legal” means any Document that (i) is a contract or agreement between parties, (ii) contains financial information relevant to IRS filings, or (iii) must be maintained to comply with federal, state, and local laws.
- g. “Policy” shall have the meaning assigned and ascribed to such term in Paragraph 1 hereof.
- h. “Recycle” means the disposal of a Document to be recycled or to be reused as scrap paper for internal printing, note taking, or other purposes.
- i. “Shred” means the use of a shredder machine to shred and dispose of documents.

3. **Document Retention; Labeling and Storage:**

Arm In Arm follows the document retention procedures and policies outlined on Table “A” attached hereto and made a part hereof. A Document of a type that is not specifically listed on Table “A”, but is substantially similar to a type of Document that is specifically listed on Table “A”, will be retained for the length of time indicated for the type of Document that is specifically listed on Table “A”.

All Documents shall be labeled by topic and year, if applicable. Electronic copies of Documents shall be archived in the computer network drive of Arm In Arm in appropriate folders. Paper hard copies of Documents shall be stored in file cabinets or archived in the basement of the building located at 123 East Hanover Street, Trenton, New Jersey. Archived paper hard copy files shall be stored in fire and water proof containers and shall be clearly labeled with “CM” topic and year. If Documents of a similar type and with the same retention and destruction requirements are stored together, they shall be labeled with a “destroy after” date.

4. **Review and Purging:**

Review and purging of Documents may take place in an ongoing manner, but must occur at least every two (2) years in even numbered years commencing with calendar year 2014. Such review and purging must also occur prior to archival storage of any Documents.

5. **Document Drafts:**

Once the final copy of a Document has been completed, the drafts of such Documents may be Recycled or Deleted, as applicable, unless such draft Documents have legal value. For Documents determined to have legal value, draft Documents containing comments shall be saved for a minimum of two (2) years, and draft Documents without comment may be destroyed once the final version of such Document is complete.

TABLE "A"

<u>Document Type</u>	<u>Value</u>	<u>Minimum Retention Requirement</u>	<u>Destruction Method</u>
Organizational founding documents (e.g. Articles of Incorporation, Bylaws, IRS Letter of Determination)	Legal, Historic	Permanently	N/A
Formal meeting notes (e.g. Board, Advisory Committee)	Administrative, Historic	Permanently	N/A
Informal (handwritten) meeting notes (e.g. staff meetings)	Administrative	2 years, or longer if topics remain relevant	Recycle
Funded grant proposals, reports, correspondence, etc.	Administrative, Historic, Legal	7 years after closure	Shred financial and private information, or Recycle; Delete electronic version
Rejected grant proposals, correspondence, etc.	Administrative, Historic	2 years after rejection	Shred financial and private information, or Recycle; Delete electronic version
Timesheets	Administrative, Historic, Legal	7 years after end of employment	Shred if contains personal information, or Recycle
Expense reports	Administrative, Historic, Legal	7 years after end of employment	Shred if contains financial information, or Recycle
Budgets	Administrative, Historic, Legal	7 years	Shred; Delete
Subscriptions/Memberships	Administrative, Historic, Legal	2 years after end of subscription	Shred if contains financial information, or Recycle
Employee evaluations	Administrative, Historic, Legal	7 years while employed, 2 years after end of employment.	Shred; Delete
Contracts with, invoices from, vendors	Administrative, Historic, Legal	7 years after expiration/payment	Shred; Delete

<u>Workshop Files:</u> <ul style="list-style-type: none"> • Marketing • Attendee list • Invoices from consultants or payment record from attendees <ul style="list-style-type: none"> • Contracts with consultants • Payments for food/supplies • General information 	Administrative, Historic and/or Legal	<ul style="list-style-type: none"> • 7 years • 7 years • 7 years • 7 years • 7 years • 2 years 	<ul style="list-style-type: none"> • Recycle; Delete <ul style="list-style-type: none"> • N/A • N/A • N/A • Shred • Recycle; Delete
Topical information	Administrative		Recycle; Delete
Correspondence (general)	Administrative, Historic		Recycle; Delete
<u>Presentations Given:</u> <ul style="list-style-type: none"> • Presentations that can be reused • Presentations for one use 	Administrative, Historic		<ul style="list-style-type: none"> • Recycle; Delete • Recycle; Delete
Photographs: <ul style="list-style-type: none"> • High quality with details of event • Photos missing details of event <ul style="list-style-type: none"> • Low quality 	Administrative, Historic	<ul style="list-style-type: none"> • 10 years • 2 years • 2 years 	<ul style="list-style-type: none"> • Recycle; Delete • Recycle; Delete • Recycle; Delete
Press clippings	Historic	Permanently if electronic or a hard copy without electronic backup; 2 years for hardcopy with backup	Recycle