

**CURAMERICAS GLOBAL, INC.**  
**Record Retention and Document Destruction**

**I. Introduction**

Curamericas Global, Inc. (“Curamericas”) 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 with the intent of impeding or obstructing any official proceeding. Accordingly, this policy:

- A. Provides for the systematic review, retention, and destruction of documents received or created by Curamericas in connection with the transaction of our organization business.
- B. Applies to all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept, and how records should be destroyed (unless under a legal hold).
- C. Is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate Curamericas’ operations by promoting efficiency and freeing up valuable storage space.

**II. Document Retention**

Curamericas 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.

<u>Category/Description</u>	<u>Retention Period</u>
<b>Corporate Records</b>	
Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
Board and Committee Meeting Agenda and Minutes	Permanent
Board Policies/Resolutions	Permanent
Bylaws	Permanent
IRS Application for Tax-Exempt Status (Form 1023)	Permanent
IRS Determination Letter and Correspondence	Permanent
State Sales Tax Exemption Letter	Permanent
Trademark registrations and copyrights	Permanent
Photos/Publications	7 years

Periodicals	2 years
Press Releases	Permanent
Construction Documents	Permanent
Contracts (after expiration)	7 years
Appointment Calendar – Executive Director	7 years
Correspondence (legal and important matters)	Permanent
Correspondence (general)	3 years
Code of Ethics and Conduct Affirmations	4 years
Conflict-of-Interest Disclosure forms	4 years

***Accounting and Corporate Tax Records***

Audited Financial Statements	Permanent
Auditor Management Letters	Permanent
Chart of Accounts	Permanent
Fixed Asset Records	7 years after disposal
Depreciation Schedules	Permanent
IRS Form 990 Tax Returns	Permanent
General Ledgers	Permanent
Business Expense Records	7 years
IRS Forms 1099	7 years
Journal Entries	7 years/Permanent *
Invoices/Accounts Payable Ledger	7 years
Sales Records	5 years
Petty Cash Vouchers	3 years
Cash Receipts	3 years/Permanent *
Credit Card Receipts	3 years
Investment reports and correspondence	7 years
Correspondence with accountants/attorneys	7 years after tax filing
Correspondence with vendors	3 years

\* If detailed information is in the general ledger, then only stated years.

***Bank Records***

Check Registers	7 years/Permanent *
Bank Deposit Slips	7 years
Bank Statements and Reconciliation	7 years
Electronic Fund Transfer Documents	7 years

\* If detailed information is in the general ledger, then only stated years.

***Payroll and Employment Tax Records***

Payroll Registers	Permanent
State Unemployment Tax Records	Permanent
Earnings Records	7 years
Garnishment Records	7 years
Payroll Tax Returns	7 years
W-2 Statements	7 years

***Employee Records***

Employment and Termination Agreements	Permanent
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Retirement and Pension Plan Documents	Permanent
Employee Personnel File	Permanent
Employee Handbook	Permanent
Employment Offer Letter	7 years after termination
Promotion, Demotion, or Discharge records	7 years after termination
Accident Reports	7 years
Worker's Compensation Records	7 years after settlement
Employment Applications	3 years
I-9 Forms (separate from personnel file)	3 years after termination
Time Cards/Records	2 years

***Donor and Grant Records***

Donor Records and Acknowledgment Letters	7 years/Permanent
Grant Applications and Contracts	7 years after completion
Fund Agreements	Permanent
Endowments	7 years after termination

***Legal, Insurance, and Safety Records***

Appraisals	Permanent
Copyright Registrations	Permanent
Environmental Studies	Permanent
Insurance Policies (claims-made or occurrence type)	Permanent
Real Estate Documents	Permanent
Stock and Bond Records	Permanent
Trademark Registrations	Permanent
Leases	7 years after expiration
Software licenses and support agreement	7 years after expiration
OSHA (Safety) Documents	7 years
Fire Inspection Reports	7 years
Claims	7 years after settlement
General Contracts	3 years after termination

**III. Electronic Documents and Records**

- A. Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time.
  
- B. Electronic Mail (e-mail): 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.

- C. Backup and recovery methods will be tested on a regularly scheduled basis. Backup tapes/devices will be maintained off-site.

#### **IV. Emergency Planning**

Curamericas' records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping Curamericas operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

#### **V. Document Destruction**

Curamericas' Executive Director is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

#### **VI. Compliance**

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against Curamericas and its employees and possible disciplinary action against responsible individuals. The Executive Director and Board chair will periodically review these procedures with legal counsel or Curamericas' certified public accountant to ensure that they are in compliance with new or revised regulations.

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Date Ratified by Board: \_\_\_\_\_

Certified by Board Secretary:

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Signature

Printed Name