Anchors Aweigh Club Inc. (AACI) Record Retention and Document Destruction Policy

The AACI shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements. Records and documents outlined in this policy include paper, electronic files (including e-mail) and voicemail records regardless of where the document is stored, including network servers, desktop or laptop computers and handheld computers and other wireless devices with text messaging capabilities. In accordance with the Sarbanes-Oxley Act, the AACI shall not knowingly destroy a document with the intent to obstruct or influence an "investigation or proper administration of any matter within the jurisdiction of any department agency of the United States . . . or in relation to or contemplation of such matter or case." If an official investigation is underway or even suspected, document purging must stop in order to avoid criminal obstruction. In order to eliminate accidental or innocent destruction, the AACI has the following document retention guidelines:

| Type of Document | Retention Period |
|---|-------------------------|
| Accounts receivable and payable ledgers and schedules | 7 years |
| Annual audited financial statements, audit reports, general ledgers, internal audit reports, trial balance journals | Permanently |
| Articles of Incorporation, Charter, Bylaws, minutes and other incorporation records | Permanently |
| Bank Reconciliation | 3 years |
| Bank Statements, deposit records, electronic fund transfer documents, and cancelled checks | 3 years |
| Chart of Accounts | Permanently |
| Contracts, mortgages, notes and leases (still in effect) | Permanently |
| Contracts, mortgages, notes and leases (expired) | 7 years |
| Correspondence (general) | 3 years |
| Correspondence (legal and important matters) | Permanently |
| Correspondence (with customers and vendors) | 2 years |
| Depreciation schedules | Permanently |

| Type of Document (continued) | Retention Period |
|---|---|
| Employment applications | 3 years from making the record or taking the personnel action |
| Garnishments | 7 years |
| Grant and other award agreements | Permanently |
| Insurance policies, records, current accident reports, claims (still in effect) | Permanently |
| Insurance policies, records, accident reports, claims (expired) | 3 years |
| Inventory records | 7 years |
| Invoices (to customers, from vendors) | 7 years |
| Letters, pledges, bequests and related communications from and with donors | Permanently |
| Loan documents and notes | Permanently |
| Personnel files (employee demographic information and compensation records) | 7 years |
| Personnel files (I-9's) | 7 years after date of hire or 1 year after termination |
| Personnel files (payroll records and summaries including records related to employee's leave) | 7 years |
| Personnel files (terminated employees) | 7 years after termination |
| Retirement and pension records including Summary Plan Descriptions (ERISA) | Permanently |
| Tax Returns and worksheets | Permanently |
| Timesheets | 7 years |

Permanently

Trademark registrations and copyrights

Workers Compensation documentation 10 years after 1st closure

| The President, and, for financial management, the Treasurer, shall have overall responsibility for implementation of this policy. The AACI Department shall follow procedures to assure retention of electronic documents as required. Backup and recovery methods should be tested on a regular basis. | | |
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