

AMERICAN SMALL MANUFACTURERS COALITION BUSINESS RECORDS RETENTION POLICY

Purpose

In accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention, and destruction of documents received or created by ASMC in connection with the transaction of organization business. This policy covers 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). The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate ASMC's operations by promoting efficiency and freeing up valuable storage space.

ASMC 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 to prevent its use in an official proceeding. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against ASMC and its employees and possible disciplinary action against responsible individuals (up to and including termination of employment). Each employee has an obligation to contact the Board Chair or President & CEO of a potential or actual litigation, external audit, investigation, or similar proceeding involving ASMC. The information listed in the retention schedule below is intended as a guideline and may not contain all the records ASMC may be required to keep in the future. Questions regarding the retention of documents not listed in this chart should be directed to the chief executive.

From time to time, the chief executive may issue a notice, known as a "legal hold," suspending the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings. No records specified in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the Board Chair or President & CEO.

ASMC 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.

Institutional and Legal Records

<u>Document</u>	<u>Retention Period</u>
Articles of Incorporation	Permanent
Minutes of Trustee Meetings	Permanent

Minutes of Trustee Committee Meetings	Permanent
Contracts and Agreements	Active + 3 Years
Policy Statements	10 Years
Legal Correspondence	Permanent

Employment Applications/Employment Listings

<u>Document</u>	<u>Retention Period</u>
Job Announcements and Advertisements	1 Year

Individuals Who Are Not Hired

<u>Document</u>	<u>Retention Period</u>
Employment Applications	1 Year
Background investigation results	1 Year
Resumes	1 Year
Letters of Recommendations	1 Year

Individual Applicants Who Are Hired

<u>Document</u>	<u>Retention Period</u>
Employment Applications	Permanent
Background Investigation Results	Permanent
Resumes	Permanent
Letters of Recommendation	Permanent

Payroll Records

Individual Employee Files

<u>Document</u>	<u>Retention Period</u>
Wage or Salary History	3 Years
Salary or Current Rate of Pay	3 Years
Payroll Deductions	3 Years
W-2 Form	3 Years
W-4 Form	3 Years
Garnishments	While employee is active
Payroll Register	3 Years

Personnel Files

Individual Employee Files

<u>Document</u>	<u>Retention Period</u>
Employment Application or Resume	Permanent
Employment History	While employee is active
Beneficiary Designation	While employee is active
Emergency Contacts	While employee is active
Promotions	While employee is active
Attendance Records	3 Years
Employee Evaluations	3 Years
Personnel Actions	3 Years
Disciplinary Warnings and Actions	3 Years
Layoff or Termination	3 Years

General Files

<u>Document</u>	<u>Retention Period</u>
Superseded Employee Handbooks	10 Years

Benefit Records

Individual Employee Files

<u>Document</u>	<u>Retention Period</u>
Education Assistance	Life of the Affected Employee
Sick Leave Benefits	Life of the Affected Employee
Retirement Benefits Accrued	Life of the Affected Employee
Disability Records	Life of the Affected Employee

General Files

<u>Document</u>	<u>Retention Period</u>
Incentive Plans (after expiration)	6 Years
Retirement Plans (after expiration)	6 Years

Revenue Records

Accounts Receivable

<u>Document</u>	<u>Retention Period</u>
Accounts Receivable	3 Years
Accounts Receivable Subsidiary Ledgers	3 Years

A/R Fiscal Year End Report	3 Years
Receipts	3 Years
Uncollected Accounts	Permanent

Accounts Payable Vendor Files

<u>Document</u>	<u>Retention Period</u>
Processed/Paid Purchase Orders	3 Years
Original Invoices	3 Years
Expense Reports	3 Years
Accounts Payable Subsidiary Reports	3 Years
Accounts Payable Post Reports	Until the Annual Audit is complete
1099 and 1042 Reports	3 Years
A/P Check Registers	3 Years

Bank Records

<u>Document</u>	<u>Retention Period</u>
Bank Statements	3 Years
Deposit Records	3 Years
Bank Reconciliation & Support	3 Years
Canceled Checks	3 Years

Capital Property Records

<u>Document</u>	<u>Retention Period</u>
Property Records	Permanent
Inventory	5 Years
Depreciation Schedules	Permanent
Sales	Permanent
Property Tax Exemption Records	Permanent

Financial Records

<u>Document</u>	<u>Retention Period</u>
Description of Accounting System	Permanent
General Ledgers and Operating Ledgers	Permanent
Subsidiary Ledgers	3 Years
Journal Vouchers and backup	3 Years

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Account Reconciliations	3 Years
Annual Financial Report	Permanent

Audit Reports	3 Years
Unclaimed Property Records	Permanent

Insurance Records

<u>Document</u>	<u>Retention Period</u>
Property Insurance Policies	3 Years
Liability	Permanent
Insurance Claim Documents	3 Years