

DOCUMENT RETENTION AND DESTRUCTION POLICY

I. Purpose

This Document Retention and Destruction Policy (“Policy”) provides for the systematic review, retention and destruction of documents received or created by Big Brothers Big Sisters of Palm Beach and Martin Counties, Inc. (the “Agency”). This Policy contains guidelines for how long certain documents should be kept and how records should be destroyed. The Policy is designed to comply with federal and state laws and regulations, to eliminate accidental or innocent destruction of records and to facilitate the Agency’s operations by promoting efficiency and freeing up valuable storage space.

II. Document Retention and Destruction

The Agency’s documents will be kept for the length of time indicated in Section III below. Documents that are not listed below, but are substantially similar to a type of document that is listed, will be kept for the length of time that is indicated for the substantially similar document. Correspondence, internal memoranda, and email should be retained for the same period as the document they pertain to or support. As an example, a letter pertaining to a particular contract would be retained as long as the contract to which it pertains. Notwithstanding the time indicated below, the remainder of this Policy (e.g., Section VII) shall be considered prior to the destruction or cessation of retention of any document. If a record meets the description of more than one category, then the category requiring a longer retention period under this Policy shall be applicable to such record.

Records should be maintained only for the recommended retention period. Records no longer required to be kept for business or legal purposes should be destroyed by shredding/destruction on company premises, or by contracting with a document shredding/destruction company that can provide a certificate of shred, as appropriate. The process of shredding/destruction should only be undertaken at the direction of the CEO or Board Chair.

All questions about the retention and destruction of specific records or departmental responsibility for maintaining certain types of records should be referred to the CEO.

III. Corporate Recordkeeping Time Frames Formation and General

Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
Board Policies/Resolutions	Permanent
By-laws	Permanent
Client (closed files- Volunteers and Clients)	5 years
Construction Documents	Permanent
Correspondence (general)	5 years
Records that document tax-exempt status	Permanent

Accounting and Tax Records

(Other than Employment Related)

Final Annual Audits and Financial Statements	Permanent
Audit and controversy records (e.g., all correspondence with the IRS and any other tax or legal authority)	Permanent
Business Expense Records	7 years
Cash Receipts	3 years
Charts of Account	Permanent
Credit Card Receipts	3 years
Depreciation Schedules	Permanent
Federal and State Information Returns (e.g., Form 990)	Permanent
Financial Records/Schedules Used in Preparation of Tax Returns	7 years

Fixed Asset Records Permanent	
“Future Relevance Records” including any document that may have relevance to a transaction occurring in the future (e.g., tax and accounting information such as basis, depreciation schedules, improvements & maintenance costs, etc.)	10 years after the filing of a return on which such information has relevance
General Ledgers and Journals	Permanent
Invoices	7 years
IRS Application for Tax-Exempt Status (Form 1023)	Permanent
IRS Form 1099s, W-8 and W-9	Permanent
Journal Entries	7 years
Ledgers (accounts payable & accounts receivable)	5 years
Petty Cash Vouchers	3 years
Sales Records (box office, concessions, gift shop)	5 years
State Tax Exemption Documents (e.g., income tax, sales tax, property tax, etc.)	Permanent
Vouchers for Payments to Vendors, Employees and Others	5 years

Bank Records

Bank Deposit Slips	7 years
Bank Reconciliations	7 years
Bank Statements	7 years
Check Registers	Permanent
Electronic Fund Transfer Documents	7 years

Payroll and Employment Tax Records

Earnings Records	7 years
Employee identification records and information	Permanent
Fire Inspection Reports	3 years
Garnishment Records	7 years
IRS Forms W-2 and W-4; State Form A-4	10 years after termination
Payroll Registers Permanent	
Payroll Tax Returns (IRS Forms 940 and 941)	10 years after termination
Severance agreements and evidence of payments	7 years after final payment
State Unemployment Tax Records	Permanent
Unclaimed wages	10 years

Employee Records

Accident Reports and Worker’s Compensation Records Permanent	
All Personnel Records (e.g., records relating to promotion, demotion or discharge)	7 years
Employment Applications	2 years
Employment and Termination Agreements	Permanent
FMLA Agreements	3 years
I-9 Forms	3 years after termination
Job Ads	1 year
Retirement and Pension Plan Documents Permanent	
Salary Schedules	5 years
Time Cards	7 years after termination

Donor / Grant Records

Donor Records and Acknowledgement Letters	
(i) if the donation is part of a series of related donations, then in which the last related donation is made,	10 years from the end of the year
(ii) if the donation is of property, then on which such information has relevance,	10 years after the filing of a return
and (iii)	10 years in all other instances
Grant Applications and Contracts received	7 years after
Completion or as required by grant	
Grant Applications and Contracts given or granted	Permanent
Hard copies of Donor Credit Card information	30 days
Volunteer and Client Records	7 years

Purchasing & Sales

Purchase orders	3 years
Requisitions	3 years
Sales contracts	3 years
Shipping & receiving reports	3 years

Legal, Insurance and Safety Records

Appraisals	Permanent
Copyright Registrations	Permanent
Environmental Studies	Permanent
General Contracts	7 years
Insurance Policies	Permanent
Litigation Resolution Related (i.e., any document related to any litigation, consent decree, release, settlement agreement, final disposition, order, stipulation of dismissal, judgment, etc.)	Permanent
Litigation Claim Related (i.e., any document related to any allegation, petition, court record, filing, pleading, etc.)	7 years following resolution and
exhaustion of all administrative and appellate remedies	
Leases	6 years after expiration
OSHA Documents	5 years after expiration
Real Estate Documents	Permanent
Stock and Bond Records	Permanent
Trademark Registrations	Permanent

IV. Electronic Documents and Records

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 length time indicated. E-mail messages that need to be retained will be printed in hard copy and kept in the appropriate file.

The CEO may establish appropriate procedures and safeguards to convert hard copy documents to electronic documents to be stored only in electronic version. Any such converted documents must be stored in accordance with the time frames set forth herein. Upon the conversion of any such hard copies to electronic documents for electronic only storage, such hard copy documents may be destroyed as provided herein.

V. Emergency Planning

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

VI. Litigation

Each director, officer, employee and staff member of the Agency ("Personnel") has a responsibility to immediately notify the Agency's CEO or Board Chair if such Personnel become aware of (i) an official governmental investigation into the

Agency or (ii) a lawsuit against the Agency, which lawsuit is either commenced or appears imminent.

VI. Approval, Review and Compliance

If the Agency receives notice of (i) an official governmental investigation or (ii) the filing of a lawsuit against the Agency, or (iii) of a lawsuit against the Agency the commencement of which is imminent, then document destruction procedures otherwise applicable under this Policy will be immediately and automatically suspended.

Document destruction will only be suspended for the documents related to the investigation or actual or potential litigation. A suspension of document destruction does not affect the length of time a document will be retained following the termination of the suspension. Instead, after the suspension is lifted, documents will be destroyed after the original required retention period is met, including any time for which a suspension was in place. However, such item may be required to be retained for a longer period if required by the resolution of the litigation or, in connection with such suspension, such document is properly reclassified as either a *Litigation Resolution Related* document or a *Litigation Claim Related* document and such reclassification lengthens the time for retention of such document.

The Board of Directors of the Agency is the approving authority for this Policy and is responsible for revising this Policy. The Board of Directors of the Agency will review this Policy as often as required by legal, regulatory, or Agency governance and, in all cases, at least annually.

The failure of a member of Personnel to follow this Policy could result in possible civil and criminal sanctions against the Agency and members of Personnel and could also result in disciplinary action by the Agency against responsible members of Personnel.

Date: November 2025