

**GBS/CIDP Foundation International  
DOCUMENT RETENTION AND DESTRUCTION POLICY**

**I. Purpose**

This policy provides for the systematic review, retention, and destruction of documents received or created by the GBS/CIDP Foundation International in connection with the transaction of the GBS/CIDP Foundation International's 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.

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 the GBS/CIDP Foundation International's operations by promoting efficiency and freeing up valuable storage space.

**II. Document Retention**

The GBS/CIDP Foundation International 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.

**III. Records**

<b>Type of Document</b>	<b>Minimum Requirement</b>
Accident Reports and Workers Compensation Records	7 years
Accounts Payable Ledgers and Schedules	7 years
Annual Reports to Secretary of State/Attorney General	7 years
Articles of Incorporation	Permanently
Audit Reports	7 years
Bank Deposit Slips	7 years
Bank Statements and Reconciliation	7 years
Board Meeting and Board Committee Minutes	7 years
Board Policies/Resolutions	Permanently
By-laws	Permanently

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Cash Receipts	7 years
Checks	7 years
Checks (for important payments and purchases)	7 years
Contracts	7 years
Construction Documents	7 years
Copyright Registrations	Permanently
Correspondence (general)	7 years
Correspondence	7 years
Correspondence (with customers and vendors)	7 years
Credit Card Receipts	7 years
Deeds and Bills of Sale	7 years
Depreciation Schedules	7 years
Donor Records and Acknowledgement Letters	7 years
Duplicate Deposit Slips	7 years
Earnings Records	7 years
Electronic Fund Transfer Documents	7 years
Employment Applications	7 years
Expense Analyses/Expense Distribution Schedules	7 years
Filings with the Registry of Charitable Trusts	7 years
Financial Statements	7 years
Fixed Asset Records	7 years
Garnishment Records	7 years
General Ledgers	7 years
Grant Applications and Contracts	7 years after completion

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I-9 Forms	7 years after termination
Insurance Policies, Records, Current Accident Reports, Claims	Permanently
Internal audit reports	7 years
IRS Application for Tax-Exempt Status (Form 1023)	Permanently
IRS Determination Letter	Permanently
IRS Annual Return (Form 990 or 990-EZ) and Worksheets	7 years
IRS 1099s	7 years
Journal Entries	7 years
Leases	7 years after expiration
Legal Files	7 years
OSHA Documents	7 years
Patents and Related Papers	7 years
Payroll Records and Summaries Payroll Registers	7 years
Petty Cash Vouchers	7 years
Press Releases	7 years
Discharge records	7 years
Retirement and Pension Plan Documents	Permanently
State Sales Tax Exemption Letter	Permanently
State Tax Returns and Worksheets	7 years
State Unemployment Tax Records	7 years
Stock and Bond Records	7 years
Trademark Registrations	Permanently
W-2 Statements	7 years

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Withholding Tax Statements	7 years
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**IV. Glossary of Terms**

1. *Board and Board Committee Materials.* Meeting minutes are retained for 7 years.

2. *Fundraisers.*

- a) The date and amount of each contribution received as a result of the solicitation campaign and, for non-cash contributions, the name and mailing address of each contributor.
- b) The name and residence address of each employee, agent or other person involved in the solicitation campaign.
- c) Records of all revenue received and expenses incurred in the course of the solicitation campaign.
- d) For each account into which the fundraiser deposited revenue from the solicitation campaign, the account number and the name and location of the bank or other financial institution in which the account was maintained.

3. *Contracts.*

Final, executed copies of all contracts entered into by the GBS/CIDP Foundation International should be retained. The GBS/CIDP Foundation International should retain copies of the final contracts for at least seven years beyond the life of the agreement.

4. *Confidential Information:*

- a) The GBS/CIDP Foundation International has taken affirmative steps to keep ALL information confidential.
- c) The GBS/CIDP Foundation International will keep all documents designated as confidential information for the existence of the Foundation.

5. *Legal Files.*

Legal counsel should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of seven years.

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### *6. Personnel Records.*

- a) State and federal statutes require the Company to keep recruitment, employment and personnel information.
- b) The GBS/CIDP Foundation International should also keep personnel files that reflect performance reviews and any complaints brought against the GBS/CIDP Foundation International or individual employees under applicable state and federal statutes.
- c) The GBS/CIDP Foundation International keeps all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file. Personnel records are kept for seven years.

### *7. Press Releases/Public Filings.*

The GBS/CIDP Foundation International should retain permanent copies of all press releases and publicly filed documents under the theory that the GBS/CIDP Foundation International should have its own copy to test the accuracy of any document a member of the public can theoretically produce against the GBS/CIDP Foundation International.

### *8. Tax Records.*

Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the GBS/CIDP Foundation International's revenues. Tax records are retained for 7 years permanently. Payroll tax returns are retained for only seven years.

## **V. 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 appropriate amount of time. If a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis.

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### **VI. Emergency Planning**

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

### **VII. Document Destruction**

The GBS/CIDP Foundation International's finance committee is responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction.

The GBS/CIDP Foundation International stores all their documents in their offices located at 104 ½ Forrest Avenue, Narberth, PA 19076.

Destruction of financial and personnel-related documents will be accomplished by shredding and/or burning.

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.

### **VIII. Compliance**

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the GBS/CIDP Foundation International's and its employees and possible disciplinary action against responsible individuals.

The finance committee will periodically review these procedures with legal counsel or the GBS/CIDP Foundation International's certified public accountant to ensure that they are in compliance with new or revised regulations.