



## **RISE AGAINST HUNGER RECORD RETENTION POLICY**

### **Reasons for Policy**

The purpose of the Rise Against Hunger Record Retention Policy (this "Policy") is to ensure that necessary records of Rise Against Hunger are adequately protected and maintained and to provide guidance on a consistent approach to discarding documents when no longer needed for business or risk management purposes, and after all legally mandated retention periods have expired.

This Policy is intended to comply with applicable federal and state laws and regulations that govern Rise Against Hunger's retention, destruction, and storage of documents.

This Policy applies to all types of information created, received, or transmitted in the transaction of Rise Against Hunger's business, regardless of format (physical, electronic, digital, or otherwise), and includes both originals and duplicates. Examples of forms of records that are covered by this Policy (each a "Record") include: agreements and contracts; appointment books and calendars; audio and video recordings; computer programs; electronic files; emails; filings with government agencies; financial records; forms used in the business; handwritten notes; invoices; letters and other correspondence; magnetic tape; memory in cell phones and PDAs; online postings, such as on Facebook, Twitter, Instagram, Snapchat, Slack, Reddit, Vine, and other social media platforms and websites; performance reviews; voicemails.

### **Record Retention**

Attached as Appendix A is a Records Retention Schedule. All Records listed in the Records Retention Schedule must be retained for the amount of time indicated in the Records Retention Schedule unless the Record falls into one of these categories: (i) it is a duplicate of a Record in the user's possession, (ii) it is a preliminary draft, (ii) it was created accidentally, (iii) it does not relate to the functional purpose of the department, or (iv) it is a book, manual or other printed material obtained from sources outside of Rise Against Hunger and retained for reference purposes.

Employees have discretion to maintain Records for longer than the amount of time indicated in the Records Retention Schedule unless a legal or business reason supports a maximum retention period (as indicated on the Records Retention Schedule), in which case the Record must be destroyed in accordance with the destruction protocol described below (except in the cases of a litigation or business hold). Additionally, employees have discretion to retain Records not described in the Records Retention Schedule.

## Record Destruction

A Record may be destroyed: (i) at any time if there are no retention requirements described in this Policy, or (ii) after the period in the Records Retention Schedule has elapsed, unless either of the following events has occurred, in which case you must preserve and not delete, dispose, destroy, or change those Records until People Operations specifically authorizes you to do so:

- *Litigation Hold*: People Operations informs you or your department that certain Records are relevant to current litigation, potential litigation, a government investigation, audit, or other event.
- *Business Hold*: People Operations or the CEO requests that you or your department suspend any routine disposal procedures in connection with certain other types of events, such as a merger or replacement of Rise Against Hunger's information technology systems.

The destruction of confidential, financial, and personnel-related Records must be conducted by shredding if possible. Non-confidential Records may be destroyed by recycling. The destruction of electronic Records must be coordinated with People Operations or Finance.

## Record Storage

Rise Against Hunger's Records must be stored in a safe and secure manner. Records containing sensitive, confidential, proprietary, or personal information must be stored in a manner to prevent access from those without legitimate business needs and in compliance with applicable laws.

Records that contain medical information concerning an employee must be stored separately from other Records.

Any Records that are essential to Rise Against Hunger's business operations during an emergency must be duplicated and/or backed up at least once per week and maintained off site.

## Mandatory Compliance

All Rise Against Hunger employees must comply with this Policy. An employee's failure to comply with this Policy may result in disciplinary sanctions, including suspension or termination. If you feel that you or someone else may have violated this Policy, even if accidental, you should report the incident immediately to your supervisor or to People Operations. No one will be subject to and Rise Against Hunger prohibits, any form of discipline, reprisal, intimidation, or retaliation for reporting incidents of inappropriate conduct of any kind, pursuing any record destruction claim, or cooperating in related investigations.

## Administration of this Policy

People Operations is in charge of administering and enforcing this Policy and will periodically review and update this Policy to ensure that Rise Against Hunger is in full compliance with applicable laws and regulations. Any questions about this Policy should be referred to People Operations.

## APPENDIX A

### Record Retention Schedule

This Records Retention Schedule is covered by Rise Against Hunger's Record Retention Policy and establishes retention or destruction schedules. Employees should give special consideration to the categories of documents listed in the Record Retention Schedule below and comply with the Record Retention Policy as it applies to specific categories. Please consult with People Operations if unsure.

RECORD	RETENTION PERIOD
<b>PERSONNEL AND HUMAN RESOURCE RECORDS</b>	
Collective bargaining agreements	3 years from expiration
EEO-1 Reports (Employer Information Report)	3 years
Plan-level employee benefit documents subject to ERISA (Form 5500 filings and supporting information, schedules, financial reports, investment statements, worksheets, receipts, resolutions, nondiscrimination and coverage test results, required communications and notices)	6 years from when the record was required to be disclosed
Participant-level employee benefit documents subject to ERISA (executed plan documents, summaries, determination letters, board or administrative committee minutes and resolutions, census data used to determine eligibility, compensation data, documents relating to participant earnings, contributions, loans, beneficiary elections, and distributions, and Form 1099-Rs)	Permanent
For candidates who are not hired, job descriptions, applications, resumes, background checks, pre-employment tests and test results, documents relating to hiring, interview notes, and I-9 forms	3 years from the date of the no-hire determination
For employees, personnel and employment records including job descriptions, applications, resumes, pre-hire documentation, and documents relating to hiring, onboarding, promotion, demotion, discipline, performance, appraisal, transfer, layoff, termination, rates of pay or other terms of compensation, garnishments, housing allowances, expenses and reimbursements, selection for training, protected leaves, reasonable accommodations, time reports, medical records, background checks, pre-employment tests and test results, and I-9 forms (unless a different period is specifically identified below)	Termination + 7 years <sup>1</sup>
Employment contracts or agreements (including separation or termination agreements and confidentiality agreements)	Termination + 7 years
Written affirmative action program (AAP) and supporting documents	3 years
Medical exams required by law	Must be discarded 30 years after termination of employment
Accident reports and workers' compensation records	Duration of employment + 30 years

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<sup>1</sup> SA NTD: Although this period is longer than that required by law, for risk management purposes, we recommend that these records, and in many other cases throughout, that Rise Against Hunger keep records longer than the minimum. Complete and accurate records are often an employer's best defense.

Injury and Illness Incident Reports (OSHA Form 301) and related Annual Summaries (OSHA Form 300A); Logs of work-related injuries and illnesses (OSHA Form 300)	5 years following the end of the calendar year that these records cover
Supplemental record for each occupational injury or illness (OSHA Form 101); Log and Summary of Occupational Injuries and Illnesses (OSHA Form 200)	5 years following the year to which they relate
OSHA documents, notices, inspections	5 years following the year to which they relate
Hazardous material exposures	Duration of employment + 30 years
Payroll records, records of hours worked; timecards; piece work tickets; wage rate tables; pay rates; earnings records; work and time schedules; records of additions to or deductions from wages; records on which wage computations are based	4 years
W-2 and W-4 Forms and Statements	As long as the document is in effect + 7 years
Records relating to internal claims of discrimination, harassment or unfair treatment, including those relating to an investigation and action taken in response.	Termination of employment of employees involved + 7 years
Records relating to an employee claim, employee charge, employee complaint, employee lawsuit, any government audit, enforcement action, or other compliance review.	Closure of matter + 7 years
<b>RECORDS RELATING TO RECURRING VOLUNTEERS</b>	
Volunteer applications, resumes, interview notes, and pre-engagement documentation	If not engaged, 1 year from date of marking record or the hire/no-hire determination, whichever is later  If engaged, termination + 5 years
Record relating to volunteer screenings, onboarding, engagement, and trainings including: offer letters, agreements, releases, waivers, consents, policy acknowledgements, and records relating to volunteer's performance, duties, or responsibilities, time reports, travel requests and reports, expenses, complaints, and reimbursements	Term of engagement + 5 years
Records relating to any injuries or illnesses sustained by volunteers	5 years following the year to which they relate
<b>RECORDS RELATING TO EVENT PROGRAMMING</b>	
Records relating to participant screenings, engagement, trainings, and participant contracts including releases, waivers, consents, and policy acknowledgments	5 years following the event to which they relate
Partner cooperation agreements, milestone request forms, memorandum, material communications, risk assessments, complaints	5 years from expiration of agreement or event, whichever is later
Records relating to any injuries or illnesses sustained by participants	5 years following the year to which they relate

Shipping and supply chain documents (including bills of lading, raw commodities forms and certifications, courier documentation, food safety plans and recalls)	7 years
Community engagement or advisory board charters, minutes, plans, members	7 years from completion
<b>DONOR, GRANT, AND CHARITABLE PURPOSE RECORDS</b>	
Donor records, tax receipts, contracts and annual reports	7 years
Grant applications and contracts	7 years
Donor acknowledgement letters and material communications	3 years
<b>CORPORATE RECORDS</b>	
Articles of Incorporation, Bylaws, Corporate Seal	Permanent
Annual corporate filings and reports to secretary of state and attorney general	Permanent
Board policies, resolutions, Board meeting minutes and committee meeting minutes	Permanent
Selection of directors and committee members documents and processes	5 years
Contracts and agreements	Permanent if current (7 years if expired)
Fixed Asset Records	Permanent
Sales and purchase records	5 years
State sales tax exemption documents	Permanent
State charitable solicitation licenses	Permanent
Records related to political contributions to officials and candidates and payments to state or local political parties and political action committees	5 years
U.S. Treasury Department, the Office of Foreign Assets Control (OFAC) records and communications	5 years following the year to which they relate
Workplace or event emergency response plan (e.g., fire evacuation plan)	Current and immediately preceding edition
<b>ACCOUNTING AND FINANCE, BANK, AND TAX RECORDS</b>	
Accounts Payable and Receivables ledgers and schedules	7 years
Annual audit reports and year-end financial statements	Permanent
Records relevant to an audit or review, including memoranda, correspondence, workpapers, and other communications	5 years from the end of the fiscal period in which the audit or review was concluded
Annual plans and budgets	2 years
Depreciation schedules	Permanent
Bank statements and reconciliation	7 years
Business and employee expense records	7 years
Cash or credit card receipts	3 years
Check registers, cancelled checks, deposit slips	Permanent
Electronic fund transfer documents	7 years
General ledgers	Permanent
Journal entries	7 years
Invoices	7 years
Petty cash vouchers	3 years

Payroll registers (gross and net)	Permanent
Annual tax filing for the organization (IRS Form 990 in the US)	Permanent
Filings of fees paid to professionals (IRS Form 1099 in the US)	7 years
Payroll tax returns and withholdings	7 years
State unemployment tax records	Permanent
IRS Form 1023 (Application for charitable and/or tax-exempt status)	Permanent
IRS Determination Letter	Permanent
Employee tax records	4 years after filing the year's 4th quarter taxes
Federal procurement contract and related weekly payroll documents	4 years from completion of contract
<b>LEGAL AND INSURANCE RECORDS</b>	
Intellectual property applications, registrations, documentation, and evidence of use documents (trademarks, copyrights, patents)	Permanent
Claims, lawsuits, settlements	Permanent
Insurance contracts and policies, certificates, material correspondence, disbursements, denials, claims, and applications	Permanent
Internal audits (risk assessments)	7 years from completion
Leases	7 years after expiration
Internal investigations into wrongdoing or claims of unfairness	7 years after termination of employment or of engagement (for volunteers or board members) of all individuals involved
Real estate documents (including appraisals, loan, construction, and mortgage contracts, deeds, and environmental studies)	Permanent
Stock and bond records	Permanent
Warranties	Duration of warranty + 7 years