



## **AMERICAN MEDIA INSTITUTE RECORDS RETENTION POLICY**

American Media Institute (“AMI”) is committed to compliance with all applicable laws and regulations governing the management, retention, and destruction of corporate documents. In keeping with its fidelity to the values of honesty and transparency and its desire to instill confidence among its employees, customers, and partners, it has created this Records Retention Policy (the “Policy”) to make clear the obligations of its employees and officers as they pertain to the physical and electronic records of AMI.

To protect against any appearance of impropriety, each type of record created or obtained by AMI will be assigned a length of time that it will be retained and when that period of time expires, it will be destroyed. These retention periods have been determined by law where applicable and by industry best practices where not guided by law and will be applied consistently; all documents within a category will be treated in the same manner. AMI is committed to uniform application the Policy and verification of its fulfillment and requires that its employees confirm their understanding of the Policy and their commitment to upholding it.

As a small non-profit organization, it is imperative that we are good stewards of our donors’ contributions and that we operate in an efficient manner and in a streamlined environment. In furtherance of these goals, the Policy is designed to reduce the costs associated with digital and physical storage and to assure a clean, safe work environment.

AMI takes seriously its obligations to preserve information relating to litigation, audits, and investigations. Therefore, information listed in the retention schedule herein is not intended to be exhaustive and may not contain all the records AMI may be required to keep in the future.

From time to time, the General Counsel or CEO 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in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the General Counsel or CEO.

The following describes the category of documents, items within that category, and the retention period assigned to that document:

<b>File Category</b>	<b>Item</b>	<b>Retention Period</b>
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<b>Corporate Records</b>	Bylaws and Articles of Incorporation	Permanent
	Corporate Resolutions	Permanent
	Board and committee meeting agendas and minutes	Permanent
	Conflict-of-Interest disclosure forms	3 years
<b>Finance and Administration</b>	Financial Statements (audited)	6 years

	Auditor management letters	6 years
	Payroll records	6 years
	Check register and checks	6 years
	Bank deposits and statements	6 years
	Chart of accounts	6 years
	General ledgers and journals (includes bank reconciliations)	6 years
	Investment performance reports	6 years
	Equipment files and maintenance records	6 years
	Contracts and agreements (includes correspondence to or from AMI officers and directors related to contracts and agreements)	6 years
<b>Insurance Records</b>	Policies	Permanent
	Accident reports	3 years
	Safety (OSHA) reports	3 years
	Claims (after settlement)	6 years
	Group disability records	6 years
<b>Real Estate</b>	Deeds	Permanent
	Leases (expired)	6 years after all obligations end
	Mortgages, security agreements	6 years after all obligations end
<b>Tax</b>	IRS exemption determination and related correspondence	Permanent
	IRS Forms 990s	6 years
	Charitable Organizations Registration Statements	6 years
<b>Human Resources</b>	Employee personnel files	Permanent
	Retirement plan benefits (plan descriptions, plan documents)	Permanent
	Employee handbooks	Permanent
	Workers comp claims (after settlement)	6 years
	Employee orientation and training materials	6 years after use ends
	Employment applications	3 years
	IRS Form I-9 (store separate from personnel file)	Greater of 1 year end of service, or three years
	Withholding tax statements	6 years
<b>Technology</b>	Software licenses and support agreements	6 years after all obligations end
<b>Reporter's Records</b>	Names and contact info for article sources	3 years

## **1. Electronic Communications**

All emails and other electronic correspondence shall be destroyed as soon as those records are 60 calendar days old. The AMI email program will automatically delete emails that reach this target age. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an “archive” computer file folder.

## **2. Paper Records**

Paper records, except the specific categories of documents listed above, that are 60 days old should be deposited in the marked bins on each floor for document destruction.

## **3. Electronic Documents and Records.**

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time.

## **4. Emergency Planning.**

AMI’s records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping AMI operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

## **5. Document Destruction.**

AMI’s General Counsel is responsible for the ongoing process of identifying its records which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding, using a certified third-party service for that purpose.

Document destruction will follow its regular schedule as described herein, unless notified of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of that investigation.

All records and documents not listed in the retention schedule, above, must be destroyed within 60 days after they are no longer needed for AMI’s business or operational purposes. Questions regarding the retention of documents not listed in this chart should be directed to AMI’s General Counsel or CEO or COO in writing.

**6. Compliance.**

Documents scheduled for destruction shall be destroyed, unless a “legal hold” requires their preservation. Failure to preserve documents included in a “legal hold” may result in civil or criminal penalties and may be injurious to AMI’s reputation. No officer or other employee shall order or take part in the destruction of documents involved in a “legal hold” and no AMI employee or contractor shall obey such an illicit order.

Failure on the part of employees to follow this policy can result in disciplinary action against responsible individuals including dismissal.

The General Counsel will periodically review these procedures with AMI’s external accounting firm to ensure that they are in compliance with new or revised regulations.

I understand and agree to comply with the American Media Institute Records Retention Policy,

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(Name) (Title)

(Date)