

# RECORDS RETENTION POLICY FOR HEALTH BRIDGES INTERNATIONAL, INC.

#### **ARTICLE I. GENERAL RULE**

The purpose of this Records Retention Policy (hereinafter the Policy) is to establish HEALTH BRIDGES INTERNATIONAL's (hereinafter HBI) general policy regarding the retention of books, records, and documents (hereinafter Records) relating to the HBI.

As a rule, HBI Records will be kept for seven (7) years from the time the Record was created. HBI Records shall include Records that are utilized in making any government filings, used in the administration of a fiduciary activities and in the administration of programs and projects related to HBI. The principal record keeper for the HBI shall be the DIRECTOR OF OPERATIONS.

### ARTICLE II. PERMANENT RECORDS

Some of the HBI's Records should be permanently maintained for historical purposes. The following Records should be permanently retained (electronically or otherwise):

- HBI By Laws and Articles of Incorporation, Agreement and Amendments
- HBI Subsidiary By Laws and Articles of Incorporation, Agreement and Amendments
- Descriptions and Summary of Material Modifications
- Minutes of HBI Board meetings
- Determination letters from the Internal Revenue Service and related correspondence
- Annual audits
- Annual government-required reports such as Form 990 and CT-12

Records which may be necessary to sound governance of HBI should be retained (electronically or otherwise) until all issues associated with all decisions are resolved. For other Records described below, the retention period shall be presumed to be seven (7) years after the Record was created.

- Payments to vendors, contractors, and consultants
- Employer contribution reports
- Vendor Contracts
- Documentation of HBI investments
- Investment Manager Reports
- Bank deposit slips, bank reconciliations, bank statements and cancelled checks
- Employee Reviews



## ARTICLE III. RETENTION OF RECORDS IN ELECTRONIC FORM

When appropriate, Records may be maintained in electronic form.

## **ARTICLE IV. LITIGATION RECORDS**

If there is litigation or anticipated litigation involving HBI, or its HBI Board of Directors then all Records pertaining to the litigation or anticipated litigation should be maintained, regardless of the guidelines stated above. It shall be legal counsel's responsibility to identify and communicate to the HBI, and other applicable service providers regarding any Records that are to be treated as litigation records.