

Kay Blada Recycling: Document Retention and Destruction Policy

Kay Blada Recycling shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements. Records and documents outlined in this policy include paper, digital or electronic files (including e-mail) regardless of where the document is stored, including but not limited to network servers, desktop or laptop computers and handheld computers and other wireless devices with text messaging capabilities.

In accordance with 18 U.S.C. Section 1519 and the Sarbanes Oxley Act, Kay Blada Recycling shall not knowingly destroy a document with the intent to obstruct or influence an "investigation or proper administration of any matter within the jurisdiction of any department agency of the United States . . . or in relation to or contemplation of such matter or case." If an official investigation is underway or suspected, document purging must cease to avoid criminal obstruction.

In order to eliminate accidental or innocent destruction, Kay Blada Recycling has the following document retention requirements:

- A. Corporate Documents. Corporate records including the corporation's Articles of Incorporation, Bylaws, and IRS Form 1023 and Application for Exemption. Corporate records should be retained permanently.
- B. Tax Records. Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of contributions made by donors, accounting procedures, and other documents concerning the corporation's revenues. Tax records should be retained for at least seven (7) years from the date of filing the applicable return.
- C. Employment Records/Personnel Records. State and federal statutes require the corporation to keep certain recruitment, employment, and personnel information. The corporation should also keep personnel files that reflect performance reviews and any complaints brought against the corporation or individual employees under applicable state and federal statutes. The corporation should also keep in the employee's personnel file all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel. Employment applications should be retained for three (3) years. Retirement and pension records should be kept permanently. Other employment and personnel records should be retained for seven (7) years.
- D. Board and Committee Material. Meeting minutes should be retained in perpetuity in the corporation's minute book. A clean copy of all other Board and Committee materials should be kept for no less than three (3) years by the corporation.
- E. Press Releases/Public Filings. The corporation should retain permanent copies of all press releases and publicly filed documents under the theory that the corporation should have its own copy to test the accuracy of any document a member of the public can theoretically produce against the corporation.
- F. 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 ten years.

G. Marketing and Sales Documents. The corporation should keep final copies of marketing and sales documents for the same period of time it keeps other corporate files, generally three (3) years. An exception to the three-year policy may be sales invoices, contracts, leases, licenses, and other legal documentation. These documents should be kept for at least three (3) years beyond the life of the agreement.

H. Development/Intellectual Property and Trade Secrets. Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the corporation and are protected as a trade secret where the corporation:

1. derives independent economic value from the secrecy of the information; and
2. has taken affirmative steps to keep the information confidential.

I. Banking and Accounting. Accounts payable ledgers and schedules should be kept for seven (7) years. Bank reconciliations, bank statements, deposit slips, and checks (unless for important payments and purchases) should be kept for three (3) years. Any inventories of products, materials, and supplies and any invoices should be kept for seven (7) years.

J. Insurance. Expired insurance policies, insurance records, accident reports, claims, etc. should be kept permanently.

K. Audit Records. External audit reports should be kept permanently. Internal audit reports should be kept for three (3) years.

L. Documents Containing Trade Secrets. The corporation should keep all documents designated as containing trade secret information for at least the life of the trade secret.

M. Contracts. Final, execution copies of all contractors entered into by the corporation should be retained. The corporation should retain copies of the final contracts for at least three (3) years beyond the life of the agreement, and longer in the case of publicity filed contracts.

N. Correspondence. Unless correspondence falls under another category listed elsewhere in this policy, correspondence should generally be saved for two (2) years

**ANNUAL STATEMENT
2018**

I, Johnson Desauguste, a member of the board of directors, principal officer, or member of a committee with board of directors delegated powers of Kay Blada Recycling, have received a copy of the document retention and destruction policy, and

JD have read and understand the policy,

JD agree to comply with the policy,

Johnson Desauguste
Print Name

Johnson Desauguste
Signature

4/19/2018
Date