## Peace Corps Foundation d/b/a Peace Corps Commemorative Foundation Document Retention and Destruction Policy

**Purpose:** Peace Corps Foundation, d/b/a Peace Corps Commemorative Foundation ("Foundation"), is committed to ensuring effective and responsible management of its records and documents in compliance with legal, regulatory, and operational requirements. This policy establishes guidelines for the retention and destruction of documents, both in electronic or physical form (collectively, "Documents") to maintain transparency, protect sensitive information, and uphold best practices.

**Scope:** This policy applies to all employees, volunteers, independent contractors (if obligated in a contract with the Foundation) and the Foundation's board members (Board members) (collectively, "People", or one "Person") as well as any Documents generated or received in the course of conducting Foundation business. Upon leaving the Foundation permanently, each Person shall confirm in writing to the Foundation that he or she has complied with this Policy

**Document Retention:** The Foundation shall retain Documents for the periods specified below, as required by applicable laws or operational needs:

- **Governance Documents:** Articles of incorporation, bylaws, meeting minutes, and other critical governance records will be retained permanently.
- Tax and Financial Records: Tax returns, financial statements, audits, and supporting Documents will be retained for a minimum of seven years.
- **Grant Records:** Documents related to grants, including applications, agreements, and reports, will be retained for seven years after the grant period ends.
- **Human Resources Records, if any:** Employee contracts, payroll records, performance reviews, and related Documents will be retained for seven years after the employee's termination.
- **Donor Records:** Documents evidencing donor contributions will be retained for a minimum of seven years.
- Program and Operational Records: Written reports, strategic plans, and other operational Documents will be retained for three years after their usefulness has concluded.
- **Legal Documents:** Contracts, agreements, and any legal correspondence will be retained for ten years after expiration or resolution of the matter.
- Electronic Communications: People may retain emails that do not fall into any of the categories set forth above as long as they delete them before or on the earlier of the date they leave the Foundation permanently and the date three years after they sent or received the emails, except as set forth below.

**Document Destruction:** Documents and records that have reached the end of their retention period will be securely destroyed to protect sensitive information and maintain compliance. Destruction methods include shredding for physical documents and permanent deletion for electronic files.

**Responsibility:** The Foundation designates its Board secretary to oversee document destruction and ensure proper procedures. In the event that the position of Board secretary is unfilled at any time, then the chair of the Foundation shall name another Board member to oversee the Document destruction and ensure that proper procedures are followed.

**Legal Holds:** In the event of litigation, government investigations, or other legal matters, the Foundation will suspend Document destruction for relevant records, regardless of their retention schedule. People involved will be notified of the legal hold and expected to comply.

**Compliance and Violations:** Failure to adhere to this policy may result in disciplinary action and could have legal consequences. The Foundation encourages prompt reporting of any potential violations to its Board chair.

**Policy Review and Updates:** This policy will be reviewed periodically by the Board members or designated committee to ensure compliance with evolving legal and operational requirements.