

**THE SOCIETY FOR CREATIVE ANACHRONISM, INC.**  
**Document Retention Policy**

**PURPOSE:**

1. The objective of this Policy is to establish mandatory guidelines for the corporate office of the Society for Creative Anachronism, Inc. ("Company") to manage, maintain and dispose of records in an orderly, reasonable and lawful manner. It is the purpose of a records retention policy to facilitate the following:
2. All records are retained for the period required by applicable state and federal laws and regulations.
3. Adequate records will be developed and maintained to document the company's compliance with all relevant laws and regulations.
4. All records necessary for business reasons are retained for a period of time that will reasonably assure the availability of those records when needed.
5. Vital records will be identified and appropriately safeguarded.
6. All records not necessary for legal and business reasons can be destroyed in order to reduce the high cost of storing, indexing and handling the vast amount of documents and paper which would otherwise accumulate.
7. Destruction of records shall take place only in compliance with this standard policy that has been developed for business reasons in order to avoid the inference that any document was destroyed in anticipation of a specific problem.
8. Documents that are not subject to retention may need to be retained due to otherwise unusual circumstances, such as litigation or government investigation.
9. Records maintained on microfilm and microfiche, magnetic tape or other electronic data processing storage media are legally acceptable media for records retention and are governed by the same guidelines as other records.
10. It is imperative that the Company knows which documents have been retained and which documents have been discarded. Therefore, extra files including correspondence, notes, memoranda, computer discs, tapes, etc. which are maintained in individual offices, or any other approved off-site location are subject to these guidelines and shall not be retained in excess of these guidelines. Such records shall not be stored and maintained at home or on personal computers at any time.

## **SCOPE:**

This Policy is applicable to all employees and records of the corporate office of the Company. For purposes of this Policy, “corporate office” means the offices comprising the Corporate Operations in Milpitas, California.

## **POLICY:**

### **1.01. Responsible Officers**

The records retention program shall be annually reviewed and approved by the SCA President or his/her designee. Suggested changes should be submitted to Vice President of the Corporate Office.

### **1.02. Training and Audit of Retention Plan**

The SCA Vice President of the Corporate Office shall be responsible for annually training and auditing the actual implementation of this Policy.

In January of each year, the SCA President or his/her designee will review closed files to determine any that are subject to destruction for that year. He/she shall first review destruction with the “Responsible Person” listed on the files to be destroyed to confirm that destruction is appropriate and then proceed with destruction.

### **1.03. Electronic Files**

Electronic files, whether on floppy discs, compact discs or hard drives, are considered company records that are subject to this Policy. The SCA Vice President of Information Technology shall maintain a procedure to destroy electronic records according to the Retention Schedule established by this Policy. Destruction shall be complete, using software that prevents such destroyed files from being reconstructed or retrieved.

### **1.04. Marking of Files and Documents**

When documents are placed in storage or otherwise removed from active use, such files and documents shall be marked with the destruction date (or “Permanent” notation) and indexed so as to allow ease of location on the appropriate date for destruction. If files within the same storage box have different destruction dates, all dates will be noted on the outside of the box, and individual files will be marked with their respective destruction dates.

Physical file boxes should be labeled as follows:

Contents: [Describe]  
Location:  
Responsible Person:  
Date Placed in Storage:  
Destruction Date(s):

### **1.05. Storage Location**

The SCA Vice President of the Corporate Office shall designate the storage location

## **1.06. Exceptions**

Requests for exceptions from this Policy should be submitted to the SCA President or his/her designee and must be supported by evidence that the basic objections above will be met. Exceptions shall not be routinely granted, as it is vital to the proper and efficient use of the Policy to have regular destruction of documents to avoid the inference of improper destruction.

If for any reason it is felt that a document should be retained due to an unforeseen circumstance, the SCA President or his/her designee must be consulted. When litigation or investigations occur, the SCA President or his/her designee will notify the appropriate personnel and direct that relevant categories of documents be labeled for retention until further notice.

The SCA President or his/her designee may exempt from destruction, any document that has been created or received that he determines constitutes historical or strategic value to the Company.

## **1.07. Interpretation of Policy**

the SCA President or his/her designee will be responsible for interpreting any portions of this Policy or the records retention plans as they may apply to specific situations.

## **1.08. Record Retention Schedule**

Below is the Retention schedule for SCA documents. If a type of document is not listed, the Vice President of the Corporate Office shall be consulted to determine an appropriate retention period and whether this schedule should be amended to include such documents.

### **The Society for Creative Anachronism, Inc. Corporate Records Retention Schedule**

All written or electronic corporate documents should normally be retained according to the following schedule. (P) indicates permanent retention.

#### **A. Correspondence to be Destroyed Within One Year.**

1. Routine letters and notes that require no acknowledgment or follow-up, such as notes of appreciation, congratulations, letters of transmittal and plans for meetings.
2. Form letters that require no follow-up.
3. Copies of inter-departmental or other company correspondence that have a copy retained in the originating branch's file.
4. Letters of general inquiry and replies that complete a cycle of correspondence.
5. Letters or complaints requesting specific action that have no further value after changes have been made or the appropriate action has been taken (such as name or address change).
6. Other letters of inconsequential subject matter or which no further reference will be required.
7. Chronological correspondence files.

8. Electronic e-mail (1 year).
- B. Correspondence Retained Four Years.**  
The following are examples:
1. Letters explaining but not establishing company policy.
  2. Letters establishing credit.
  3. Collection letters after the account is paid.
- C. Correspondence Retained for the Life of the Principal Document that It Supports or Retained Indefinitely.**  
The following are examples; specific retention periods should be defined in the appropriate functional category.
1. Letters pertaining to copyrights, bills of sale, permits, etc.
  2. Letters which constitute all or a part of a contract or which are important in the clarification of certain points in a contract.
  3. Letters denying liability of the company.
- D. General Corporate Records.** The SCA Vice President of the Corporate Office shall keep all legally required documents and documents of business significance and, in addition, shall keep or provide for the retention of such other documents as may have historical value.
1. Records of incorporation, by-laws and amendments thereto for the corporation and affiliates (P)
  2. Corporate Officer Manuals and amendments thereto (P)
  3. Qualification to do business in states and related records (P)
  4. Corporate seals (P)
  5. Stock transfer and stockholder records (P)
  6. Dividend records (P)
  7. Minute books of Corporate and affiliate Boards, with minutes of Board committees and board of directors meetings (P)
  8. Annual reports, quarterly reports and other periodic material (P)
  9. Board of Directors Packet (5 years)
  10. All financing documents, credit agreements, loan agreements, commitments, etc. (review 10 years after satisfaction or termination)
- E. Legal Files and Papers.**
1. Requests for departure from Records Retention Policy (P)
  2. Litigation files including correspondence, depositions, discovery, responses and pleadings:
    - a. Major litigation, as determined by the SCA President or his/her designee, in consultation with the Corporate Council, on a case by case basis (5 years after expiration of appeals or time for filing of appeals)
    - b. Other litigation (3 years after expiration of appeals or time for filing of appeals)
  3. Court orders involving the Company (P)
  4. Legal memoranda and opinions subject matter files. (5 years after close of matter. Thereafter, review for utility and historic value.)
- F. Contracts.**
1. Contracts and related correspondence and documents - commercial (6 years after expiration or termination plus written approval of [Counsel/Legal Committee])

- G. Pension Documents and the Supporting Employee Data.** Pension documents and supporting employee data shall be kept in such manner and for such periods that the company can establish at all times whether or not any pension is payable to any person and if so, the amount of such pension. Review every 10 years.
1. Pension plans and all amendments thereto (P)
  2. Pension plan determination letters (P)
  3. Records of employee service and eligibility for pension (including hours worked and any breaks in service) (P)
  4. Required personal information on employees and former employees. (Name; address; social security number; period of employment; pay type, either hourly or salary) (P)
  5. Records of plan administrator setting forth authority to pay (P)
  6. Records of pension paid to employees or their beneficiaries (6 years after final payment – may be kept by Plan Recordkeeper).
  7. Reports of pensions or pension plans filed with the Department of Labor or the Internal Revenue Service (six years after filing)
- H. Personnel.**
1. Invention assignment forms (P)
  2. Records showing employee exposure to potentially hazardous substances (P, except documents may be discarded 30 years after termination of all affected employees)
  3. Medical histories or health data (P) – must be kept in separate files marked “confidential” and accessible only to HR Department or with approval of Legal Counsel
  4. Earnings records (general) (P)
  5. Employees' personnel records, including individual attendance records, wage and salary history, application forms, performance evaluations, termination papers, exit interview records, withholding information, garnishments, test results (individual), employment contracts, separation agreements, etc. (P)
  6. Attendance records (general) (3 years)
  7. Job descriptions (3 after superseded)
  8. Safety or injury frequency reports (10 years)
  9. Affirmative action programs (5 years after superseded)
  10. EEO-I and EEO-2 Employer information reports (4 years after superseded or filing, whichever is longer)
  11. Applications, resumes, results of pre-employment physicals, interview notes, and related correspondence (non-hired applicants)
    - a. Advertised job openings (2 years from date of non-hire decision)
    - b. Unsolicited applications and resumes (1 year)
  12. Correspondence with employment agencies and advertisements for job openings (1 year from date of hiring decision)
  13. Employee handbooks (P)
- I. Insurance Records.**
1. Policies:
    - a. Workers compensation (P)
    - b. Umbrella (P)

- c. Property (P)
- d. Fidelity & crime (P)
- e. General liability (P)
- f. Other 3rd party (P)
- 2. Certificates
  - a. Issued on behalf of Company (3 years)
- b. Issued to Company (P)
- 3. Group insurance plans:
  - a. Active employees (until plan is amended or terminated)
  - b. Retirees (P or until 6 years after death of last eligible participant)
- 4. Audits or adjustments (two years after final adjustment)
- 5. Claims files (including correspondence, medical records, injury documentation, etc.):
  - a. Workers compensation (10 years after termination of employment)
  - b. Product liability (open if no litigation, 5 years after last correspondence or contact with claimant if litigation)
  - c. 1st party (5 years after last correspondence or contact with insurer)
  - d. Other 3rd party (5 years after last correspondence or contact with 3rd party)
  - e. Long term disability (10 years after the earlier of: return to work, retirement or death)
  - f. Group life (5 years after close)
- 6. Release/settlements (25 years)
- 7. Inspections (3 years)
- 8. Loss runs (10 years)
- 9. Annual loss summaries (10 years)
- 10. Journal entry support data (7 years)

**J. Accounting and Finance.**

- 1. Annual audited financial statements (P)
- 2. General ledgers (10 years\*)
- 3. General journals and other posting & control media subsidiary to the general ledgers (7 years\*)
- 4. Annual audit work-paper package (7 years\*)
- 5. Monthly financial statements (7 years\*)
- 6. Bank statements and cancelled checks (7 years\*)
- 7. Original copies of accounts payable invoices and employee expense reports: Normal trade payables (7 years\*)
- 8. Freight bills (3 years\*)
- 9. Accounts receivable invoices (4 years\*)
- 10. Accounts receivable cash receipts files (4 years \*)
- 11. Annual plans and budgets (2 years)
- 12. Strategic plans (2 years after termination of plan period)
- 13. Census bureau and other government surveys (7 years)
- 14. Physical inventory records (7 years \*)
- 15. Appropriation requests (renew 1 year after post completion.)
- 16. Letters of Credit or Guaranty (2 years after expiration).

\* The Corporate Controller will annually issue a directive outlining the specific years to be destroyed.

K. **Tax Records.** All corporations required to file a tax return of any kind must keep books of account or records, including inventories, as are sufficient to establish the amount of gross income, deductions, credits or other matters required to be shown in any such return. These documents and records shall be kept for as long as the contents thereof may become material in the administration of federal, state, and local income, franchise, and property tax laws. The corporation shall keep sufficient records to prove its cost basis and to compute its earnings and profits permanently.

1. Tax returns (income, franchise, property) (P)
2. Tax bills, receipts and statements (P)
3. Tax work-paper packages originals (P. Operating division copies to be retained for 7 years)
4. Payroll tax records (7 years\*)
5. Sales and use tax records (7 years\*)
6. Excise tax records (7 years\*)

\* Represents the estimated retention period for storage planning purposes. Actual retention will be based on the specific statute of limitations governing each return and the necessity to keep documents for years which remain open pending settlement with the taxing authorities. The Corporate Controller will annually issue a directive outlining the specific years to be destroyed.

L. **Payroll Documents.** Payroll documents and supporting data shall be kept in such a manner that the company can prove that it has fulfilled its responsibilities under the Wage and Hour Rules of the Department of Labor, as well as the Walsh-Heasley Act. Also, payroll records must be such as to enable the company to compute the payment of any pension. (See section G above.)

1. Employee earnings record (P)
2. Labor distribution cost records (7 years)
3. Payroll registers (gross and net) (7 years)
4. Unclaimed wage records (6 years)
5. Employee deduction authorizations (4 years after termination)
6. Assignments, attachments and garnishments (3 years after payment or settlement)
7. Time cards and sheets (2 years)

M. **Plant and Property Records.**

1. Original purchase, sale or lease agreement of plant facility (P)
2. Correspondence, property deeds, easements, licenses, rights of way and miscellaneous documents pertaining to sold plant facilities (10 years plus approval of Legal Counsel)
3. Property and liability insurance policies (P)
4. Fixed asset ledgers (year-end run) (7 years plus written approval of Corporate Controller)
5. Mortgages (10 years after satisfaction)
6. Plant inspection and safety audit reports (3 years)

N. **Research and Publications (e.g., TI, Compleat Anachronist).**

1. Original patents, trademarks and copyrights (Life of patent, trademark or copyright plus 3 years)

2. Minutes of all technical meetings (20 years plus written approval of Legal Counsel)
  3. Invention notebooks and invention records (20 years plus written approval of Legal Counsel)
  4. Laboratory notebooks, supporting data and test data (20 plus written approval of Legal Counsel)
  5. Outside submissions of new product ideas (20 years plus written approval of Legal Counsel)
- O. **Safety and Environmental Documents.** The company must keep all documents in relation to employee and public health and safety for such periods as will enable it to demonstrate compliance with an applicable regulation or standard. These standards and regulations are in a state of continual expansion and change. Following is a current list of widely applicable rules:
1. Any government issued permit or authority relating to environmental laws or regulation (P)
  2. Consent decrees, safety orders or other administrative orders regarding the environment or the safety and health of employees (P)
  3. Mechanical power press: records of periodic regulation inspection (P)
  4. Industrial slings: inspection records and repair records (1 year)
  5. Carcinogen Records:
    - a. Authorized personnel rosters (20 years)
    - b. Medical records (30 years)
    - c. Monitoring or inspection reports (P)
  6. Ground fault: testing records (P or until superseded)
  7. Ethylene oxide testing records (See 29 CFR 1910.1047) (P)
  8. Environmental site files including insurance claims (P)
  9. Records relating to disposal of hazardous waste (P)
  10. Records relating to disposal of non-hazardous plant waste (3 years)
  11. Records relating to beneficial re-use of foundry by-products (20 years)
- S. **Sales and Marketing (e.g., SCA Marketplace).**
1. Advertising copy and marketing programs (5 years)
  2. Copies of packaging materials and instructions (including MSDS sheets) (5 years)
  3. Customer order files (4 years)
  4. Customer correspondence files (4 years)
  5. Salesman's call reports (10 years)
  6. Sales department copies of invoices (1 year)
  7. Export certificate of origin and information necessary to prepare certificate for exports to or imports from Canada (5 years)
  8. NAFTA Certificates (4 years)
  9. Records relating to duty drawbacks on exports (4 years)
- T. **Credit Relating to Customers.**
1. Application for credit, approval forms, qualification reports (1 after account becomes inactive)
  2. Collection litigation files (3 after legal settlement and satisfaction of judgment)
  3. Correspondence regarding collection (2 years)
  4. Customer financial statements (4 years after last order from customer)



5. Guarantees and subordination agreements (3 years after termination and settlement of account)
  6. Security agreements & financing statements (3 years after satisfaction)
- U. **Procurement Material Control.**
1. Purchase orders (6 years)
  2. Vendor files (requisitions, purchase orders, quotations, correspondence) (6 years)
  3. Inventory control reports (3 years)
- W. **First Aid Record**
1. First Aid records (30 years)
- X. **General.**
1. Books, professional periodicals, published reports, etc. (review annually for useful and discard obsolete material)
  2. Charitable contribution records (7 years)
  3. Consultants reports (2 years)
  4. Departmental budgets and related work sheets (2 years)
  5. Major corporate and division policy and procedure manuals (Originating department (P) receiving departments retain only current version)
  6. Major speeches by corporate officers (4 years, thereafter review for historical value)
  7. Material of historic value (pictures, publications. etc) (P)
  8. Project files not otherwise classified (review at close of project)
  9. Trade association materials (review annually for usefulness)
  10. Customer RFDs. Specifications, cost sheets, prints, and out quotation and review forms – if no contract results (4 years)
  11. Supply Agreements (6 years plus approval of Legal Counsel)
  12. Surcharge or Price Change, notification or agreements (10 years)
  13. Monthly Sales Reports/Forecasts (4 years)
  14. Monthly Sales Meeting Notes (2 years)
  15. Customer-generated performance reports (Life of Product + 3 years)
  16. Sales presentations (4 years)