

Centurion Ministries, Inc. Record Retention Policy

Centurion Ministries, Inc. (“Centurion”) takes seriously its obligations to preserve information relating to all of its operations. This record retention policy is applicable to all Centurion employees, Board members, officers, volunteers and, where feasible, contractors (“Covered Persons”)

The information listed in the retention schedule below is intended as a guideline and may not contain all the records that Centurion may be required to keep in the future. Questions regarding the retention of documents not listed in this chart should be directed to the Executive Director or the Legal Director.

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in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the Executive Director or Legal Director.

File Category	Item	Retention Period
Corporate Records	Bylaws and Certificate of Incorporation	Permanent
	Corporate resolutions	Permanent
	Board and committee meeting agendas and minutes	Permanent
	Conflict-of-interest disclosure forms	5 years
Finance and Administration	Financial statements (audited)	7 years
	Auditor management letters	7 years
	Payroll records	7 years
	Check register and checks	7 years
	Bank deposits and statements	7 years
	Chart of accounts	Permanent
	General ledgers and journals (includes bank reconciliations)	7 years
	Investment performance reports	7 years
	Equipment files and maintenance records	7 years after disposition
	Contracts and agreements	7 years after all obligations end

	Correspondence — general	5 years
Insurance Records	Policies — occurrence type	Permanent
	Policies — claims-made type	Permanent
	Accident reports	7 years
	Safety (OSHA) reports	7 years
	Claims (after settlement)	7 years
	Group disability records	7 years after end of benefits
Real Estate	Deeds	Permanent
	Leases (expired)	7 years after all obligations end
	Mortgages, security agreements	7 years after all obligations end
Tax	IRS exemption determination and related correspondence	Permanent
	IRS Form 990s	7 years
Human Resources	Employee personnel files	Permanent
	Retirement plan benefits (plan descriptions, plan documents)	Permanent
	Employee handbooks	Permanent
	Workers comp claims (after settlement)	7 years
	IRS Form I-9 (store separate from personnel file)	Greater of 1 year after end of service, or three years
	Withholding tax statements	7 years
Client Files	Client inmates' and exonerees' records, transcripts and investigation files	Permanent

1. 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. 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. Backup and recovery methods will be tested on a regular basis.

2. Emergency Planning.

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

3. Document Destruction.

The Executive Director 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.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

4. Compliance.

Failure on the part of Covered Persons to follow this policy can result in possible civil and criminal sanctions against Centurion and its Covered Persons and possible disciplinary action against responsible individuals. The Executive Director, Legal Director and Head of the Audit Committee will periodically review these procedures with legal counsel and/or Centurion’s certified public accountants to ensure that they are in compliance with new or revised regulations.