

THE DIAMOND BLACKFAN ANEMIA, INC.

DOCUMENT RETENTION AND DESTRUCTION POLICY

The Diamond Blackfan Anemia Foundation, Inc. (“DBAF”) shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements.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 includes paper, electronic files (including e-mail) and voicemail records regardless of where the document is stored, including network servers, desktop or laptop computers and handheld computers and other wireless devices with text messaging capabilities. In order to eliminate accidental or innocent destruction, DBAF has the following document retention requirements:

1. Corporate Documents					
Category	Document Type	Location of Document	Filing Method/ Filing Index	Retention Period	
General Corporate Records	Articles of Incorporation, Charter, Seal, Annual Reports, Quarterly Reports and Proxy Material; Minutes of Directors Meetings; Canceled Stock Certificates; Capital Stock Ledger; Charters, Constitutions, Bylaws; Corporate Election Records; Dividend Records; Incorporation Records; Licenses - Federal, State and Local; Shareholder Proxies Except for Those Related Solely to the Election of Directors; Stock Transfer and Shareholders; Board of Director Agendas, Minutes, Resolutions			Permanent	
	Executive Memoranda/Correspondence			4 Years	
	Executive Team Meeting Minutes			3 Years	
	Material of Historic Value (Pictures, Publications)			Permanent	
Acquisitions	Corporate Acquisition Files			Permanent	
	Pre-Merger Filings			10 Years	
Divestitures	Business Divestiture Files			Permanent	
Financing	Financing Documents, Credit Agreements, Loan			4 Years From	

	Agreements			Expiration/ Termination of Agreement	
	Strategic Financial Plans, Including Consultant Reports			Permanent	
Corporate Compliance Program	Policies & Amendments			Permanent	
	Completed Compliance Questionnaires			7 Years	
	Correspondence & Memoranda Regarding Legal Issues Raised & Disposition			7 Years	
	General Correspondence & Memoranda			3 Years	
Communications	Newsletters/Employee Publications			Permanent	
	Speeches			7 Years	
	News Releases			Permanent	
	Seminar & Conference Material			3 Years	
2. Civil and Commercial Documents					
Category	Document Type	Location of Documen t	Filing Method/ Filing Index	Retention Period	
General Legal	Legal Advice & Memoranda			7 Years After Disposition	
	Claims			7 Years After Disposition	
	Closing Documents – Acquisitions, Mergers, Consolidations, Reorganizations and Dissolutions			Permanent	
	Due Diligence Files			Permanent	
	Copyright & Trademark Registrations			Permanent	
	Regulatory Body Filings			Permanent	
	Litigation Files & Related Documents			7 Years After	

				Disposition	
	State Qualifications/Certifications			Permanent	
	Licenses Specific to Employment Agencies			Permanent	
	Waiver Requests & Dispositions Relating to Record Retention Requirements & Code of Business Conduct Requirements			Permanent	
	Security Files/Employee Case Files			Permanent	
General Contracts	Confidential disclosure Agreements, License Agreements; Patent/Trademark Licenses			Permanent	
	Office Equipment Lease Agreements & Related Records			7 Years	
	Government Contracts			Permanent	
	Franchise Agreements			Permanent	
	Cooperation Agreements			10 Years After Expiration	
	Employment Agreements			10 Years After Expiration	
	General Commercial/Services Contracts			10 Years After Expiration	
	Contract Disputes			7 Years After Disposition	
Customer Contracts	Customer Contracts			Permanent	
	Customer Correspondence, Customer Invoices, Sales Reports, Customer Service Records, Customer Complaints			4 Years	
	Customer Guarantee and Subordination Agreements, Security and Financing Agreements			4 Years From Expiration or Termination	
Staffing Records	Records Relating to Job Orders, Placements &			8 Years	

	Assignments of Talent (Including Records Describing the Dates, Duration, Rate of Pay, Company Fees, Title or Position, Name & Address of Talent Placed For Each Job Placement)				
General Correspondence	General Administrative Correspondence			4 Years	
Advertising & Marketing	Advertising Copy & Marketing Programs, Marketing Layouts			2 Years	
3. Human Resources Documents					
Category	Document Type	Location of Document	Filing Method / Filing Index	Retention Period	
Personnel Records	Personnel Files -Application, Pre-Employment Self-Identification Forms, Job Requisition, Resume, Transcript, Offer Letter, Post-Employment Self-Identification Forms, Confidentiality Agreement, Restrictive Covenants, Drug Screening, Background Check, Salary/Job Changes, Training Certificates, Performance Appraisals, Leave of Absence Records, Benefit Enrollment Forms, Disciplinary Warnings, Tuition Reimbursement Records, Change of Address, Bonus Payments, Termination Records, Exit Interviews			Termination + 7 Years	
	Confidential Medical, FMLA, ADAAA Accommodation Files			Termination + 7 Years	
	I-9 Forms			The Longer Of 3 Years Form Hire Or 1 Year Following Termination	
	Fidelity Bonds			Termination + 4 Years	
Recruiting	Restrictive Covenant Agreement Templates			Permanent	

	Employment Application Materials For Applicants Not Hired			7 Years	
	Employment Tests/Validation Studies			Permanent	
	Search Files			3 Years	
	Help Wanted Ads and Postings			4 Years	
Employee Relations	Affirmative Action Plans, Including Outreach and Mandatory Job Posting Information			7 Years	
	Compliance Review Materials			3 Years	
	EEO-1 Reports			7 Years	
	EEO Statistics			7 Years	
	Employee Handbooks, Personnel Policy Manuals & Memoranda			Permanent	
	Administrative Agency Discrimination Complaint Files			End of Case + 7 Years	
	Internal Discrimination Complaint Files			Resolution + 7 Years	
	Non-Discrimination Employment Law Complaint Files			End of Case + 7 Years	
	Miscellaneous EEO File			4 Years	
	Employee Relations Policies & Procedures			Until Suspended + 6 Years	
	Service Awards			3 Years	
	Employee Relations Training Materials			4 Years	
	Unemployment Claims			3 Years	
Employee Benefits	Employee Benefits Plans & Supporting Documents, Including Insurance Certificates & Amendments, SPDs			Permanent	
	Employee Service, Eligibility & Vesting Records, Employee Claims and Payments			7 Years After Employee Termination	
	Short-Term Disability and Sick Benefits Files			Review Every 10 Years	
	Workers' Compensation Records, Including Injury Reports, Claims, Litigation Files, Correspondence, Medical Records,			(20 Years in NY)	

	Certificate of Insurance				
	Long-Term Disability Records			7 Years	
	Pension Plans, 401(k) & Any Non-Qualified Plans, Including Service Eligibility & Vesting, Benefit Claims, Plan Administrator Correspondence			Permanent	
	Premium Statements - Monthly			7 Years	
	Group Insurance Correspondence			7 Years	
	Government filings (5500's, etc.)			7 Years	
	COBRA Records			7 Years After Coverage Termination	
Compensation	Compensation Plans, Including Commissions Bonuses, Incentives & Awards			7 Years	
	FLSA Internal Audits			Permanent	
	Bonus Plans			7 Years	
	Job Descriptions			Permanent	
	Salary Surveys/Benchmarking Studies			7 Years	
Education & Development	Training Program Materials			Until Superseded	
	Training Program Attendance Records			7 Years	
	Training Program Invoices & PO's			1 Year	
	Training Program Budgets			3 Years	
Relocation	Bid Information & Contracts Third Party Vendors			7 Years	
	Moving Expense Files			3 Years	
	Spouse Assistance Files			3 Years	
	Surveys on Relocation Services			3 Years	
4. Health and Safety Documents					
Category	Document Type	Location of Document	Filing Method/ Filing Index	Retention Period	

	Safety Records/Inspection Reports			Permanent	
	Safety & Health Policies and Procedures			Permanent	
	OSHA Log #200			7 Years	
	OSHA Form #101			7 Years	
	Records Showing Employee Exposure to Hazardous Substances			Permanent	
5. Insurance Documents					
Category	Document Type	Location of Document	Filing Method/ Filing Index	Retention Period	
Commercial/ Business Insurance	Register of Policies			While Current +10 Years	
	Policies & Related Correspondence– Umbrella, Property, Fidelity & Crime, General Commercial/Liability, Other Third Party Insurance			Term of Policy + 10 Years	
	Loss Experience			Term of Policy + 7 Years	
	Insurance Claims/Suits			Term of Policy + 10 Years	
	Premium Information			Term of Policy + 7 Years	
	Accident Reports			Permanent	
	Insurable Values Reports			7 Years	
	Fire Prevention Plans			Permanent	

6. Accounting Documents					
Category	Document Type	Location of Document	Filing Method/ Filing Index	Retention Period	
General Accounting & Finance	Year-end Accounts Receivable(ledger & supporting documents)			10 Years	
	Year-end Accounts Payable (ledger and supporting documents)			10 Years	
	Budget Data			10 Years	
	Appropriation Requests			6 Years	
	Charged-Off /Uncollected Accounts			3 Years	
	Checks & Drafts - Cancelled			10 Years	
	Cost Accounting Data			7 Years	
	Earnings Register			6 Years	
	Customer Ledgers			7 Years	
	Customer Credit & Collection Records			7 Years	
	Expense Reports			7 Years	
	Year-end Financial Statements (certified and uncertified) including Balance Sheets, Income Statements, Equity Statements and Related Notes			3 Years	
	Financing Agreements, Promissory Notes and Related Documents			Permanent	
	Purchase Orders, Vendor Files (Requisitions, Quotations, Correspondence			4 Years	
	Credit Memos, Check Requisitions			7 Years	
	General Ledger			7 Years	
	Journal Entries			Permanent	
	Sales Commission Statements			7 Years	
	Trial Balance Sheets			7 Years	
	Underlying Work Papers			7 Years	
Travel Expense Reports			4 Years		
Postal Records, Including Registered Mail & Insured Mail Logs			3 Years		

	and Meter Records				
Payroll	Attendance Roster/Time Cards			7 years	
	Checks/Receipts of Wages or other evidence of payment for services rendered by employees			7 years	
	Payroll Deductions, Withholdings, Authorizations, Attachments & Garnishments			7 years after termination	
	Payroll Earnings Register			7 years	
	Sales Commissions				
	Payroll Journal Entries			7 years	
	Payroll Tax Records & Reports to Federal, State & Municipal Agencies			7 years	
	Savings & Investment disbursement Documents			7 years	
	Unclaimed Salaries & Wages			10 years or as dictated by state law	
7. Tax Documents					
Category	Document Type	Location of Document	Filing Method/ Filing Index	Retention Period	
Taxes					
	Business Expenses - Employees			7 years	
	Calendar of Tax and Report due Dates			Permanent	
	Claims and Refunds			Permanent	
	Charitable Contributions			7 years	
	Depreciation Ledgers			7 years	
	Correspondence with Federal/State/Municipal Taxing Authorities			Permanent	
	Dividend and Interest Information Returns			7 years	
	Earnings and Profit Studies			Permanent	
	Tax Returns (including schedules, working papers) for federal,			Permanent	

	state, local taxes, including real estate, sales, use, personal property taxes, charitable contribution records.				
	Taxes Paid			Permanent	
Audits	External Audit Reports and Management Letters			Permanent	
	Appeals			Permanent	
	Internal Audit Reports			Permanent	
	Internal Audit Work Papers			7 years	
8. Banking Documents					
Category	Document Type	Location of Document	Filing Method/ Filing Index	Retention Period	
	Bank Deposits			7 years	
	Cancelled Notes			10 years	
	Daily Cash Activity			Permanent	
	Cash Activity Supporting Documents			7 years	
	Petty Cash Data			3 years	
	Credit Agreements			Until Suspended + 3 years	
9. M&A Documents					
Category	Document Type	Location of Document	Filing Method/ Filing Index	Retention Period	
	Acquisition Data - Acquired			Permanent	
	Acquisition Data – Not Acquired			7 years	
	Divesture Data - Divested			Permanent	
	Divesture Data – Not Divested			7 years	
10. Property Documents					
Category	Document Type	Location	Filing	Retention	

		of Document	Method/ Filing Index	Period	
Facilities	Real Property Acquisition Data			Permanent	
	Appraisals			Until Superseded	
	Purchase Data, Property Deeds			Permanent	
	Mortgage Documents			Permanent	
	Depreciation Schedules; Easements, Licenses, Rights of Way; Related Correspondence			Permanent	
	Environmental Studies			Permanent	
	Maintenance & Repair records				
	Real Property Maintenance and Repair Documentation			7 years	
	Real Property Sales			Permanent	
	Leases and Supporting Documentation			Expiration + 10 years	