

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shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements.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 | |

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| | Agreements | | | Expiration/ Termination of Agreement | |
| | Strategic Financial Plans, Including Consultant Reports | | | Permanent | |
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| 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 | |
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| Communications | Newsletters/Employee Publications | | | Permanent | |
| | Speeches | | | 7 Years | |
| | News Releases | | | Permanent | |
| | Seminar & Conference Material | | | 3 Years | |
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| 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 | |

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| | | | | 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 | |

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| | 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 | |

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| | 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) | |

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| | 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 | |
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| 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 | |

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|---|--|-----------------------------|--|---------------------------|--|
| | 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 | |
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| 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 | |
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| 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 | | |

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| | 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 | |

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| | 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 | |
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| 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 | |
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