

**DOCUMENT RETENTION/DESTRUCTION POLICY
FOR
THE INTERNATIONAL RHINO FOUNDATION**

1. Introduction

1.1 Purpose

State and Federal law mandates that The International Rhino Foundation (“*IRF*”) retain certain records for prescribed lengths of time. IRF also desires to maintain certain records demonstrating its commitment to compliance. For these reasons, IRF has instituted the following Document Retention/Destruction Policy (the “*Policy*”) that applies to all of IRF’s records. IRF’s records include essentially all records produced, whether hard copy or electronic. A record may be as obvious as a memorandum, an email, or a contract, or something not as obvious, such as a computerized desk calendar, an appointment book, or an expense record. This Policy describes which records of IRF must be retained for operational, legal, or historical purposes and identifies the retention period for each record type. Adherence to the established retention schedule ensures the following: (a) maintenance of fewer corporate records; (b) protection of vital records; and (c) reduction of maintenance and record storage costs.

1.2 Scope/Compliance

IRF expects for all employees, officers, and members of its Board of Directors to comply fully with this Policy. This Policy and any subsequent amendments thereto will be disseminated to all employees, officers, and members of the Board of Directors of IRF to ensure that they are fully apprised of the provisions of the Policy. Moreover, IRF’s employees will receive periodic training concerning the retention and destruction schedule and the procedures outlined in the Policy. It is the responsibility of IRF’s Executive Director (the “*Executive Director*”) to ensure compliance with this Policy. The Executive Director will regularly audit compliance with the Policy and use his best efforts to remedy any violations that are discovered.

2. Records Retention Schedule

2.1 General

Records of IRF must be maintained according to the guidelines established in the Records Retention Schedule attached hereto as Exhibit “A.” Records are to be maintained only for the recommended retention period; records held at the expiration of a retention period shall be destroyed as provided herein. All questions about the retention and destruction of specific records or the maintenance of certain type of records should be referred to the Executive Director who, in her discretion, shall confer with legal counsel if necessary.

2.2 Cessation of Destruction

The destruction of any records as mandated by the terms of this Policy shall be suspended if IRF’s records are relevant to litigation or potential litigation (*i.e.*, a dispute that could result in litigation) or to an investigation or audit by a regulatory body such as the Internal Revenue Service or the Texas Attorney General. IRF shall maintain such relevant records until as such time IRF’s legal counsel determines the records are no longer needed.

3. Maintenance and Destruction of Records

3.1 Custodian of Records

IRF shall designate a records custodian (the “*Records Custodian*”) who shall be accountable for the storage and preservation of all records whether written or electronic or in other forms. The Records Custodian shall maintain an index generally identifying the records of IRF that presently exist and their location. The index shall also identify all types of electronic data and their location. Likewise, the Records Custodian shall keep a permanent record of the records destroyed and the method of their destruction.

3.2 Duplicate Records and Unneeded Records

To reduce the amount of unnecessary record retention, any duplicate copy of a filed record shall be destroyed in the manner set forth herein. Records that do not fall within the categories identified in the Records Retention Schedule and that are no longer needed for the operation of the business or are no longer required to be kept by law also shall be destroyed in the manner set forth herein.

3.3 Storage of Records

Records required to be maintained per the Records Retention Schedule shall be stored in an efficient and practical manner (*i.e.*, files that relate to similar subjects and have similar retention periods should be stored together) at an on-site area or an adequately secured off-site location. Non-permanent files may be stored in cardboard file boxes. Each file box must be labeled on the front with the contents, dates covered, and destruction date, if applicable. Permanent records, if practical, should be kept in metal fire-resistant file cabinets. As indicated above, the designated Records Custodian shall be responsible for categorizing and maintaining a listing of all records maintained and the location.

3.4 Record Destruction

Annually (after each fiscal year end or such other periodic date designated by the Records Custodian) all records exceeding their designated retention period shall be destroyed. A listing of all files containing such records shall be supplied to the Executive Director prior to such destruction for his review and final approval. A listing of all records destroyed shall be maintained permanently by the Records Custodian for future reference. With respect to sensitive personnel or business written data the term “destroy” shall mean shredding or burning; otherwise, the term “destroy” with respect to other such written data shall simply mean discarding the record in a trash receptacle, although shredding is the preferred manner of destruction for all written records regardless of their nature. The determination of the sensitive nature of records shall be within the discretion of the Executive Director.

3.5 Electronic Records

Electronic data and records shall be kept for the time periods specified for paper documents. The fact that information is stored or communicated through electronic means shall not affect the treatment of such information pursuant to this Policy.

4. Miscellaneous

4.1 Effective Date

This Policy is effective _____, 2009. This Policy supersedes any previous policies issued by IRF relating to the subject matter herein.

4.2 Annual Review

This Policy shall be reviewed by IRF's legal counsel at least annually or more often if required by legal, regulatory, or other corporate issues.

4.3 Amendment of Policy

The Policy may be amended from time to time by the Board of Directors of IRF at any annual, regular or special meeting.

EXHIBIT "A"

RECORDS RETENTION SCHEDULE

| Type of Record | Retention Period |
|---|---|
| | |
| | |
| Accounting Records: | |
| Accounts payable ledgers and paid invoices | 7 years |
| Annual information returns (IRS Forms 990) | Permanently. Store with financial records. Federal law requires that the three most recent years returns be kept in the organization's headquarters office and be made available for public inspection upon request. |
| Audit reports | Permanently |
| Budgets | 7 years |
| Financial statements (annual) | Permanently |
| Financial statements (interim) | 7 years |
| Fixed asset purchases | 7 years after disposition of asset |
| General ledger and journals | Permanently |
| Inventory records | 7 years |
| Loan payment schedules | 7 years after payment of loan |
| Tax returns (other than IRS Forms 990) | 7 years |
| Treasurer's financial report (year-end) | Permanently |
| Treasurer's financial report (periodic) | 3 years |
| | |
| | |
| Bank Records: | |
| Bank reconciliations | 7 years |
| Bank statements | 7 years |
| Canceled checks | 7 years |
| Cash deposit slips | 7 years |
| Check registers | 7 years |
| Electronic payment records | 7 years |
| | |
| | |
| Organizational and Tax-Exemption Records: | |
| Incorporation documents including Articles of Incorporation, Bylaws, and related documents | Permanently. Store in corporate record book. |
| Meeting/board documents including agendas, minutes and related documents | Permanently. Care should be taken to include only necessary information in these documents. Compile and file records on yearly basis; store in corporate record book. |
| Tax-exemption documents including application for tax exemption (IRS Form 1023), IRS determination letter and any related documents | Permanently. Federal law requires copies of these documents to be held at the organization's headquarters. These records must be made available for public inspection upon request. Store in corporate record book. |

| Type of Record | Retention Period |
|--|--|
| | |
| Grant Records: | |
| Fulfilled grant proposals (where IRF is grantor or grantee) | 7 years |
| Grant agreements and any subsequent modifications (where IRF is grantor or grantee) | 7 years |
| Other pertinent correspondence and materials concerning grants (where IRF is grantor or grantee) | 7 years |
| Pre-grant inquiry forms and other documentation for grants (where IRF is grantor or grantee) | 7 years |
| Unfulfilled grant requests and applications and other related correspondence and documents (where IRF is grantor) | 3 years |
| | |
| Employee Records: | |
| Employee files including employment contracts, performance evaluations, etc. | 4 years after termination of employment |
| Employee withholding records | 7 years |
| Expense reports | 7 years |
| Group insurance policy records | 4 years after termination of policy |
| Payroll and employment tax returns and W-2 and W-4 Forms | 7 years |
| Payroll earnings and withholding records | 7 years |
| Payroll time cards and time attendance sheets | 7 years |
| Solicited applications, resumes, job advertisements, etc. related to non-employees | 2 years after advertisement or interview |
| Unsolicited applications, resumes, job advertisements, etc. related to non-employees | 6 months |
| | |
| Employee Benefit Plan Records: | |
| Brokerage/trustee statements concerning investments | 7 years |
| Financial statements | 7 years |
| General ledger and journals | 7 years |
| Internal Revenue Service / Department of Labor correspondence | 7 years |
| Participant communications relating to distributions, terminations, beneficiaries, etc. | 7 years |
| Pension/profit sharing plans and all amendments thereto | Permanently |
| Records concerning contributions to and distributions from pension/profit sharing plans | 7 years after completion of payment of plan benefits |
| | |
| Miscellaneous Records: | |
| Agreements, contracts, leases, mortgages and permits | 7 years after expiration |
| Bills of sale for important purchases | 7 years after purchase |
| Correspondence - general correspondence from third parties | 3 years |
| Correspondence – tax and legal correspondence | 7 years |
| Depreciation schedules | 3 years after life of asset |
| Insurance policies and related documents | 7 years after expiration or settlement |
| Investment statements and other relevant documents and documents concerning acquisition and disposition of investments | 7 years |
| Journals | 3 years |
| Miscellaneous internal reports, memoranda and correspondence | 3 years |
| Real estate records including deeds and appraisals | Permanently |