

## Pratham USA Document Retention Policy

*Adopted as of October 24, 2011*

Pratham USA shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements.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 accordance with 18 U.S.C. Section 1519 and the Sarbanes Oxley Act, a Pratham USA employee shall not knowingly destroy a document with the intent to obstruct or influence an "investigation or proper administration of any matter within the jurisdiction of any department agency of the United States . . . or in relation to or contemplation of such matter or case." If an official investigation is underway or even suspected, document purging must stop in order to avoid criminal obstruction.

In order to eliminate accidental or innocent destruction, Pratham USA has the following document retention requirements:

1. Accounts payable ledgers and schedules: 10 years
2. Accounts receivable ledgers and schedules: 10 years
3. Audit reports of accountants: Most recent 3 years for 15 years.
4. Bank statements: 10 years
5. Capital stock and bond records: ledgers, transfer payments, stubs showing issues, record of interest coupon, options, etc.: Permanently
6. Cash books: 10 years
7. Checks (canceled, with exception below): 10 years
8. Checks (canceled, for important payments; i.e., taxes, purchase of property, special contracts, etc. [checks should be filed with the papers pertaining to the underlying transaction]): 10 years
9. Contracts and leases (expired): 10 years
10. Contracts and leases still in effect: Permanently
11. Correspondence, general: 4 years
12. Correspondence (legal and important matters): 15 years
13. Depreciation schedules: 10 years
14. Donation records of endowment funds and of significant restricted funds: Permanently
15. Donation records, other: 10 years [Note: Donation records include a written agreement between the donor and the charity with regard to any contribution, an email communication or notes of or recordings of an oral discussion between the charity and the donor where the representative of the charity made representations to the donor with regard to the contribution on which the donor may have relied in making the gift.]
16. Duplicate deposit slips: 10 years
17. Employee personnel records (after termination): 7 years
18. Employment applications: 3 years

19. Expense analyses and expense distribution schedules (includes allowance and reimbursement of employees, officers, etc., for travel and other expenses: 10 years
20. Financial statements (end-of-year): Permanently
21. General ledgers and end-of-year statements: Permanently
22. Insurance policies (expired): Permanently
23. Insurance records, current accident reports, claims, policies, etc.: Permanently
24. Internal reports, miscellaneous: 3 years
25. Inventories of products, materials, supplies: 10 years
26. Invoices to customers: 10 years
27. Invoices from vendors: 10 years
28. Journals: 10 years
29. Minute books of Board of Directors, including Bylaws and Articles of Incorporation: Permanently
30. Payroll records and summaries, including payments to pensioners: 10 years
31. Purchase orders: 3 years
32. Sales records: 10 years
33. Tax returns and worksheets, revenue agents, reports, and other documents relating to determination of tax liability: Permanently
34. Time sheets and cards: 10 years
35. Voucher register and schedules: 10 years
36. Volunteer records: 3 years