GENESIS AT THE CROSSROADS
DOCUMENT RETENTION POLICY

Genesis at the Crossroads takes seriously its obligations to preserve information relating to litigation, audits, and investigations.

The information listed in the retention schedule below is intended as a guideline and may not contain all the records that Genesis at the Crossroads may be required to keep in the future. Questions regarding the retention of documents not listed in this chart should be directed to the Founder. Certain of the documents listed in the chart may not now or in the future be in use by Genesis at the Crossroads (for example, documents related to employees).

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in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the Founder.

File Category	*Item*	Retention Period
Corporate Records	*Bylaws and Articles of Organization*	Permanent
	Corporate resolutions	Permanent
	Board and committee meeting agendas and minutes minutes	Permanent
	Conflict of Interest Acknowledgement/Disclosure Forms	4 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	7 years
	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	3 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
	Employee orientation and training materials	7 years after use ends
	Employment applications	3 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
	Timecards	3 years
Technology	*Software licenses and support agreements*	7 years after all obligations end

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.

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

3. Document Destruction.

The Founder is responsible for the ongoing process of identifying records that have met the required retention period and overseeing the destruction of these records. 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 individuals associated with Genesis at the Crossroads to follow this policy can result in possible civil and criminal sanctions against Genesis at the Crossroads and such individuals and possible disciplinary action against such individuals. The Founder will periodically review these procedures with legal counsel or Genesis at the Crossroads' certified public accountant to ensure that they are in compliance with new or revised regulations.