

BUILDINGS & BOOKS, INC.

DOCUMENT RETENTION, DESTRUCTION AND TRANSPARENCY POLICY

SECTION 1. PURPOSE: In accordance with 18 U.S.C. Section 1519 and the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention and destruction of documents received or created by Buildings & Books in connection with the transaction of organization business.

This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept, and how records should be destroyed. The policy is designed to ensure compliance with federal and state laws and regulations, and to eliminate accidental or innocent destruction of records.

This policy also provides for the handling of certain documents to ensure their accessibility by the public in order to provide maximum transparency of the activities of Buildings & Books.

SECTION 2. DOCUMENT RETENTION: Buildings & Books follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

Corporate Records

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| Annual Reports to Secretary of State/Attorney General | Permanent |
| Articles of Incorporation | Permanent |
| Corporate Bylaws | Permanent |
| Corporate Policies/Board Resolutions | Permanent |
| Board and Committee Meeting Minutes | Permanent |
| IRS Application for Tax-Exempt Status (Form 1023) | Permanent |
| IRS Determination Letter | Permanent |
| State Sales Tax Exemption Letter | Permanent |
| Construction Documents | Permanent |
| Fixed Asset Records | Permanent |
| Contracts (after expiration) | 7 years |
| Correspondence (general) | 3 years |

Accounting and Corporate Tax Records

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| Annual Audits and Financial Statements | Permanent |
| Depreciation Schedules | Permanent |
| General Ledgers | Permanent |
| IRS 990 Tax Returns | Permanent |
| Business Expense Records | 7 years |
| IRS 1099s | 7 years |
| Journal Entries | 7 years |
| Invoices | 7 years |
| Cash Receipts | 3 years |
| Credit Card Receipts | 3 years |

Bank Records

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| Check Registers | Permanent |
| Bank Deposit Slips | 7 years |
| Bank Statements and Reconciliation | 7 years |
| Electronic Fund Transfer Documents | 7 years |

Legal and Insurance Records

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|---------------------------------------|-----------|
| Real Estate Documents | Permanent |
| Appraisals | Permanent |
| Insurance Policies | Permanent |
| Stock and Bond Records | Permanent |
| Trademark Registrations | Permanent |
| Leases (after expiration) | 6 years |
| General Contracts (after termination) | 3 years |

Fundraising Records

| | |
|---|---------|
| Donor Records and Acknowledgement Letters | 7 years |
| Grant Applications and Contracts (after completion) | 5 years |

SECTION 3. ELECTRONIC DOCUMENTS AND RECORDS: Electronic documents, including records of donations made online, will be retained as if they were paper documents. If a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file.

SECTION 4. DOCUMENT DESTRUCTION: The President of the Board of Directors is responsible for the ongoing process of identifying the corporation's records which have met the required retention period and overseeing their destruction. Destruction of financial 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.

SECTION 5. PUBLIC ACCESSIBILITY OF DOCUMENTS: All records and documents of Buildings & Books will be made available to any director, officer or the public upon request. However, in order to facilitate their accessibility, and enhance the transparency of the corporation's activities, the Secretary of the Board of Directors shall post, or cause to be posted, the following documents on the Buildings & Books website:

Articles of Incorporation

Bylaws

IRS Application for Tax-Exempt Status (Form 1023)

IRS Determination Letter

State Sales Tax Exemption Letter

IRS 990 Tax Returns

Annual Reports to Secretary of State/Attorney General

Board and Committee Meeting Minutes

Corporate Policies and Board Resolutions

- Conflict of Interest Policy
- Document Retention, Destruction and Transparency Policy
- Fundraising Policy
- Whistleblower Protection Policy

SECTION 6. COMPLIANCE: Failure to comply with this policy can result in possible civil and criminal sanctions against Buildings & Books, as well as possible disciplinary action against responsible individuals. The Board of Directors will periodically review these procedures to ensure that they are in compliance with new or revised regulations.

SECTION 7. EMPLOYEES: This policy reflects the fact that Buildings & Books has no employees. Should that change, the board shall amend this policy by adopting appropriate provisions relating to employee and payroll records.