# GLOBAL CAPACITY ALLIANCE, INC.

## RECORD RETENTION AND DESTRUCTION POLICY

### Purpose

To provide for the appropriate retention and destruction of documents and other records in accordance with the needs of Global Capacity Alliance, Inc. (the "Organization"), and to assure the retention of records in connection with court proceedings or investigations.

### Policy

The Organization shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements.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 governed by this policy include paper, electronic files (including email), and voicemail records regardless of where the document is stored, including network servers, desktop, or laptop computers and handheld computers and other wireless and mobile devices with text messaging capabilities.

In accordance with 18 U.S.C. § 1519 and the Sarbanes-Oxley Act, the Organization 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 or 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, or if a subpoena or other enforceable demand for records is received, document purging must stop in order to avoid criminal obstruction. The President of the Organization will review the matter immediately and determine specifically which records must be treated as responsive to the investigation or demand for records.

In order to eliminate accidental or innocent destruction, the Organization adopts the document retention requirements set forth on the attached Exhibit A, which may be revised and updated by the Board of Directors as the needs of the Organization evolve.

Adopted by the Board of Directors: 15 August 2026

## EXHIBIT A – DOCUMENT RETENTION REQUIREMENTS

| Type of Document | Minimum Requirement |
|---|---|
| Accounts payable ledgers and schedules | 7 years |
| Audit reports | Permanently |
| Bank reconciliations | 7 years |
| Bank statements | 7 years |
| Checks (for important payments and purchases) | Permanently |
| Contracts, mortgages, notes and leases (expired) | 7 years |
| Contracts (still in effect) | Permanently |
| Correspondence (general) | 3 years |
| Correspondence (legal and important matters) | Permanently |
| Correspondence (with customers and vendors) | 7 years |
| Correspondence (with IRS or other gov't agencies) | Permanently |
| Deeds, mortgages, and bills of sale | Permanently |
| Depreciation Schedules | Permanently |
| Duplicate deposit slips | 3 years |
| Employment applications | 3 years |
| Expense analyses/expense distribution schedules | 7 years |
| Year-end financial statements | Permanently |
| Insurance Policies (expired) | 7 years |
| Insurance records, current accident reports, claims, policies, etc. | Permanently |
| Internal audit reports | 3 years |
| Inventories of products, materials, and supplies | 7 years |
| Invoices (to customers, from vendors) | 7 years |
| Minute books, bylaws and charter | Permanently |
| Patents and related papers | Permanently |
| Payroll records and summaries | 7 years |
| Personnel files (terminated employees) | 7 years |
| Retirement and pension records | Permanently |
| Tax returns and worksheets | Permanently |
| Timesheets | 7 years |
| Trademark registrations and copyrights | Permanently |
| Withholding tax statements | 7 years |