

## DOCUMENT RETENTION AND DESTRUCTION POLICY

Capstone Group, a Washington D.C., non-stock, non-profit corporation (the “Company”), shall use its best efforts to retain records for the period of their immediate or current use and in accordance with this Record Retention and Document Destruction Policy (this “Policy”), unless longer retention is necessary for historical reference or to comply with contractual or legal requirements. Records and documents outlined in this Policy include 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 (collectively, “Documents”).

Personnel of the Company shall not knowingly destroy any Document in violation of this Policy or 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 any such matter or case.

Documents that have been retained beyond the period indicated in the chart below may be destroyed periodically, taking into consideration constraints on storage space and staff time. Notwithstanding the foregoing, if litigation is filed or government investigation is commenced against the Company, from the date such action is known to the Company, all destruction of Documents shall be suspended as promptly as is reasonable under the circumstances.

The Company’s retention requirements for Documents under this Policy shall be as follows:

| <b>Type of Document</b>   | <b>Minimum Requirement</b> |
|---|----------------------------|
| Accounts payable ledgers and schedules                              | 7 years                    |
| Audit reports   | Permanently                |
| Bank reconciliations  | 2 years                    |
| Bank statements   | 3 years                    |
| Checks (for significant payments and purchases)                     | Permanently                |
| Contracts, mortgages, notes and leases (expired)                    | 7 years                    |
| Contracts (still in effect)   | Permanently                |
| Correspondence (general)  | 2 years                    |
| Correspondence (legal matters and complaints)                       | Permanently                |
| Deeds, mortgages and bills of sale                                  | Permanently                |
| Depreciation schedules  | Permanently                |
| Duplicate deposit slips   | 2 years                    |
| Employment applications   | 3 years                    |
| Expense analyses/expense distribution schedules                     | 7 years                    |
| Year-end financial statements                                       | Permanently                |
| Insurance policies (expired)  | 3 years                    |
| Insurance records, current accident reports, claims, policies, etc. | Permanently                |
| Internal audit reports  | 3 years                    |

| <b>Type of Document</b>                         | <b>Minimum Requirement</b> |
|---|----------------------------|
| Inventories of products, materials and supplies | 7 years                    |
| Invoices for items purchased or sold            | 7 years                    |
| Minute books, bylaws and charter                | Permanently                |
| Grant Reports/Awarded Grants                    | 7 years                    |
| 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                    |