



Legacy Care Partners, Inc.

RECORD RETENTION AND DESTRUCTION POLICY

Legacy Care Partners, Inc. and its subsidiaries, affiliates, and successors (the “Company”) is committed to promoting high standards of honest and ethical business conduct and compliance with applicable laws, rules, and regulations. As part of this commitment, the Company has adopted this Record Retention and Destruction Policy (“Policy”).

1. PURPOSE

The purpose of this Policy is to ensure that the Company retains its official records in accordance with the requirements of all applicable laws and to ensure that official records no longer needed by the Company are discarded at the proper time. This Policy provides guidelines concerning the length of time official records should be retained under ordinary business circumstances.

2. COVERED RECORDS

This Policy applies to all official records generated in the course of the Company operations, including but not limited to:

- typed, or printed hard copy (i.e., paper) documents;
- electronic records and documents (e.g., Web files, text files, PDF files, spreadsheets);
- electronic mail;
- video or digital images;
- graphic representations;
- electronically stored information contained on network servers and/or document management systems; and
- recorded audio material.

3. ADMINISTRATION

RECORD RETENTION

- a. All records shall be maintained and stored in accordance with the applicable retention period.
- b. The Directors of the Company are responsible for the administration and implementation of this Policy to all employees.
- c. The Directors of the Company will make modifications from time to time to ensure this Policy complies with local, state, and federal laws or as the Board determines necessary.
- d. The Directors of the Company will monitor the Policy compliance of officers and employees.

APPLICABLE RETENTION PERIOD

- a. **A retention period of seven (7) years** is required for:
 - audit work papers, related documents, and communications;
 - account payable ledgers and schedules;
 - account receivable ledgers and schedules;
 - employee personnel records (7 years from separation);
 - employment contracts and termination agreements (7 years from separation);
 - employee earnings records (7 years from separation);
 - employee expense reports (7 years from separation);
 - legal memoranda and opinions (7 years from close of matter);

- legal correspondence (7 years from close of matter);
 - contracts & leases and related documents (7 years from expiration or termination);
 - product inventory;
 - payroll deductions, garnishments, W-2, and W-4 forms (7 years from termination);
 - state sales tax information and returns;
 - business expense records;
 - payroll tax records;
 - interim financial statements;
 - note receivables ledgers and schedules;
 - bank statements and canceled checks;
 - investment records (7 years from sale of investment); and
 - earning records.
- b. **A retention period of five (5) years** is required for:
- customer invoices;
 - vendor invoices;
 - purchase orders;
 - state unemployment tax records;
 - accident records, OSHA reports and related records;
 - employment applications;
 - employee deduction authorizations (5 years from termination);
 - sales records;
 - workers unemployment records; and
 - salary records.
- c. **A retention period of three (3) years** is required for:
- general correspondence;
 - annual plans and budgets; and
 - credit card records.
- d. **A permanent retention period** is required for:
- Articles of Incorporation;
 - Company bylaws;
 - Company corporate records;
 - Executive/Board policies and resolutions;
 - annual reports;
 - annual audit reports;
 - bank statements and general ledgers;
 - tax returns and payroll records;
 - union agreements;
 - licenses and permits;
 - government investigation or audit records;
 - court orders;
 - releases and settlements;
 - insurance policies (including expired policies);
 - insurance claims files including correspondence and supporting documentation;
 - certificates of insurance issued to the Company or its affiliates or subsidiaries;

- original purchase, sale, lease agreements;
- property deeds, assessments, and rights of way;
- property insurance policies;
- employee handbooks and training manuals;
- financial statements, depreciation schedules, check registers; and
- material of historical value.

RECORD STORAGE PROCEDURES

- a. Where practicable, the Company official records should be organized and stored according to general categories in a manner that best facilitates the efficient administration of the Company's operations and in the normal course of business. Records within each category should generally be organized and stored in chronological order or by time period (e.g., by month or year).
- b. Categories of records not required to be retained on a permanent basis should be maintained by date or conspicuously dated to enable such records to be easily identified for destruction at the end of the applicable record retention period.
- c. Records containing confidential information should be labeled and/or stored in a manner to limit access to those employees or other individuals with authorization to view such records.
- d. Electronic mail will be archived according to the Company's electronic mail archiving policy.
- e. If documents cannot be converted or it is not economically feasible to convert to an electronic format, original and hard copies are to be secured in locked cabinets, vaults, or safe location during the applicable retention period or hold periods.

4. SECTION 802 OF SARBANES-OXLEY ACT imposes criminal penalties for altering documents (e.g., alteration, destruction, or concealment of business records) to obstruct or influence a legal investigation. Penalties include fines and/or imprisonment for up to 20 years for destroying, altering or falsifying audit records. Records covered in the rule include any memoranda, correspondence, communications, and electronic records that are created, sent, or received in connection with the audit or review, including any conclusions, opinions, analyses, or financial data related to them.

5. SUSPENSION OF RECORD DISPOSAL DURING INVESTIGATION AND LITIGATION ("HOLDS")

In the event an employee of the Company reasonably anticipates or becomes aware of a governmental investigation or audit concerning the Company or the commencement of any litigation against or concerning the Company, such employee shall inform the Company's General Counsel and any further disposal of documents shall be suspended until such time as the Board of Directors, with the advice of the Chief Executive Officer and the Company's General Counsel, determines otherwise. The Directors shall take such steps necessary to promptly inform affected staff of any suspension in the disposal or destruction of data and/or documents.

6. CONFIDENTIALITY AND OWNERSHIP

All records are the property of the Company and employees are expected to hold all business records in confidence and to treat them as Company assets. Records must be safeguarded and may be disclosed to parties outside of the Company only upon proper and express authorization. Any subpoena, court order or other request for documents received by employees, or questions regarding the release of Company's records, must be directed to the General Counsel prior to the release of such records. Any records of the Company in possession of an employee must be returned to the employee's supervisor or the General Counsel upon termination of employment.