



APPENDIX A
 TO
 AMERICAN SADDLEBRED HORSE ASSOCIATION
 AND AMERICAN SADDLEBRED REGISTRY, INC.
 RECORDS MANAGEMENT POLICY AND PROCEDURES
 (ADOPTED JUNE, 2013)

Corporate Records

Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
By-laws	Permanent
Fixed Asset Records	Permanent
Horse Registration Records & related communications	Permanent
Contracts (after expiration)	15 years
Membership Records	1 year after expiration
Ballots and Proxies	1 year after election

Accounting, Banking and Tax Records

Annual Audits and Financial Reports	Permanent
Audit Reports	Permanent
Depreciation Schedules	Permanent
Check Registers	Permanent
IRS Approval Records	Permanent
IRS Tax Returns	Permanent
State Returns	Permanent
Business Expense Records	7 years
IRS 1099s	7 years
Journal Entries	7 years
Invoices	7 years
Bank Deposit Slips	7 years
Bank Statements and Reconciliation	7 years
Electronic Fund Transfer Documents	7 years
Sales Tax Return and Records	7 years
Charitable Gaming Records	7 years

Fundraising Documents	7 years
Petty Cash Vouchers/Cash Receipts/Credit Card Receipts	3 years
Marketing Materials	3 years

Payroll and Employment Tax Records

Payroll Registers	Permanent
State Unemployment Tax Records	Permanent
Pension/Profit Sharing Information	Permanent
Earnings Records	7 years
Garnishment Records	7 years
Payroll Tax Returns	7 years
W-2 Statements	7 years

Employee Records

Employment and Termination Agreements	Permanent
Retirement and Pension Plan Documents	Permanent
Personnel Records	7 years after termination
Donor Records and Acknowledgement Letters	7 years
Accident Reports and Worker's Compensation Records	5 years
Salary Schedules	5 years
Grant Application and Contracts	5 years after completion
Employment Applications	3 years
I-9 Forms	3 years after termination

Legal, Insurance and Safety Records

Appraisals	Permanent
Environmental Studies	Permanent
Insurance Policies	Permanent
Real Estate Documents	Permanent
Construction Documents	Permanent
Stock and Bond Records	Permanent
Trademark or Copyright Registrations/Patents	Permanent
Leases	6 years after expiration
OSHA Documents	5 years
General Contracts	3 years after termination



**AMERICAN SADDLEBRED HORSE ASSOCIATION
AND SADDLEBRED REGISTRY, INC.
RECORDS MANAGEMENT POLICY AND PROCEDURES**

I. INTRODUCTION

The corporate documents of American Saddlebred Horse Association and the American Saddlebred Registry, Inc. (hereinafter referred to as “the Company”) are important assets. Records Management is the plan for the systematic control of business documents, in all their forms and formats, from the creation through their final disposition. The Records Management Policy and Procedures (“Policy”) provides employees the direction to manage their records and information according to sound business and legal practices. All business documents and information are assets of the Company and the Company has the right to direct, through its records retention program, how to retain records and information and when and if they will be destroyed.

II. DEFINITIONS

- A. “Department” refers to the organizational subdivisions within the Company;
- B. “Department Head” refers to the senior Company staff member of each Department;
- C. “Document Retention Team (DRT)” refers to a group of individuals described in section IV(D) of this Policy;
- D. “Litigation Hold Order” refers to a litigation hold, as described in section VI of this Policy;
- E. “Records” refers to all documentary materials, regardless of physical form or characteristics, made, utilized or received in connection with the transaction of business or other business-related activities of the company. By way of illustration, hard copies of documents, handwritten notes, email messages, photographs, Excel® and PowerPoint® materials are all “Records.” All types of computer storage media may contain “Records”; and
- F. “Retention Schedule” refers to lists of certain Records that the Company has determined need to be retained for certain periods of time because of legal, tax, audit, business or historical reasons, which can be found at Appendix A.

III. POLICY STATEMENT AND PRINCIPLES

It is the intention of this Company to maintain complete and accurate Records and retain them only as long as they are useful in assisting employees in completing the requirements of their jobs, unless longer retention is required under this Policy. To that end, the following principles (which are described in greater detail in Sections IV, V and VI) dictate how employees must handle Company Records:

A. All documents and other forms of communication (i.e., e-mails, Excel® spreadsheets, Word® documents etc.) that contain information regarding the business activities of the Company are considered Records. Documents and information such as periodicals, published books, stock copies of reports received, magazines and other reference information are not considered Records.

B. Records should be retained by Company employees if they are the types of records that an employee would retain in order to perform their job responsibilities. The Records should be retained only as long as they are needed for business purposes, unless they need to be retained for a greater length of time under this Policy. Records that need to be retained for a greater length of time are: (a) identified in the Retention Schedule, which list Records that the Company has determined need to be kept for certain periods of time because of legal, tax, audit, business or historical reasons; and/or (b) identified in the exceptions to the Retention Schedule, which are outlined in Section IV(B) of this Policy. Records that are subject to a Litigation Hold Order must always be retained, even if they are no longer needed and/or beyond the applicable retention period. Records that do not have to be retained under this Policy are to be destroyed in a timely fashion.

C. Individual employees who create or possess hard copy Records are the custodians of those Records and are responsible for handling those Records consistent with this Policy.

D. The ASHA Information Systems (“IS”) Department is the custodian of electronic Records stored on the Company server and will be retaining, and deleting, this information consistent with this Policy. Employees: (a) are still responsible for the content of the individual Records they create on those servers; (b) must manage hard copies of Records that are created electronically; and (c) must manage e-mail, consistent with this Policy. The IS Department will delete E-mails from the company server six months after they are created. If an employee believes an E-mail, or its attachments, should be retained under this Policy then they should either print and retain the e-mail or save it to a personal folder on the Outlook® system, if the employee has access to personal folders.

E. Department Heads are responsible for the compliance of their own respective Departments.

F. Under the direction of senior management, a Document Retention Team shall monitor compliance with this Policy.

G. An annual Records review shall take place, during which time, each Department shall dispose of Records that have exceeded their retention periods.

H. No employee shall: (a) remove or destroy Records in an unauthorized manner; or (b) falsely or inappropriately alter information in any Record.

I. Employees must not assert any personal or property right in any Record, as all Records generated or received by the Company are Company property. This Policy applies to all Records generated within the scope of an employee's duties. Consequently, any Records that are maintained or in possession of an employee in their home must be treated as if they were physically located at the Company office.

IV. MAINTENANCE PROCEDURES AND RETENTION SCHEDULE

A. Responsibilities

Each Department Head shall have ultimate responsibility for compliance with these policies and procedures. The Department Head may appoint a designated individual to serve as its Department's Records Coordinator. The Records Coordinator shall manage compliance with the Retention Schedule for their Department and updating the Retention Schedule as necessary. The Company shall maintain an up-to-date copy of this Policy (including attached Retention Schedule), monitor compliance, with the assistance of the DRT, and ship Records to storage when necessary.

B. Retention Schedule

There are certain Records that the Company has determined must be retained for certain periods of time for legal, tax, audit, business or historical reasons. These Records are identified on the Retention Schedule, which is attached to this Policy as Appendix A. The Retention Schedule tells you when to discard Records that you are keeping pursuant to the Retention Schedule.

The time periods identified in the Retention Schedule dictate how long a Record should be maintained. However, the following are exceptions to the retention periods listed in the Records Schedules:

1. Litigation Hold Orders (See Section VI of this Policy).
2. Contractual Requirements. When contractual requirements dictate that Records be retained, they must be retained in accordance with the contract.
3. Compliance with the Laws. Care has been taken to ensure that the stated retention periods comply with federal and state regulations. However, retention requirements of federal, state and local laws, rules and regulations take precedence over the retention periods listed in the schedule. If an employee believes that such a Record is potentially subject to destruction under the Records management schedule, please notify a member of the DRT, who will advise accordingly.
4. Records of Historical Significance. Some Records have historical significance, which may warrant an extended retention period and special handling.
5. Related Records. Some Records with shorter retention periods may relate to Records with longer retention periods. In those cases, employees should refer to the longer retention period when assessing the Record. For example, if a document that must be preserved

for a certain number of years is attached to a piece of correspondence that does not have to be retained, the correspondence should be retained for the longer retention period.

C. Maintaining Records

Each Department will maintain files that are needed for day-to-day operations or required to meet other objectives of this Policy, including legal objectives and litigation holds.

Records should be managed by employees from creation to disposal. Employees should retain the types of Records that they need in order to perform their job responsibilities. Records that are no longer needed and do not have to be retained pursuant to this Policy should be discarded. For example, if an employee believes that a series of memos will assist the employee in meeting their job responsibilities, then the employee should retain those Records. If the memos being retained subsequently become obsolete for business purposes, then the employee should discard them, unless they are otherwise subject to a longer retention period under this Policy (because they are identified on the Retention Schedule and/or subject to an exception). If the memos are being retained because they are subject to a retention period identified on the Retention Schedule, then they should be maintained for the period of time identified on the Retention Schedule and discarded when the retention period has expired. Records that are subject to a Litigation Hold Order must always be retained under this Policy.

1. Control of Hard Copy Records

Hard-copy Records shall be controlled by employees within a Department. An employee who creates the Record is the custodian of that Record and is responsible for maintaining it within this Policy. Other employees may retain duplicates while they are useful for business purposes, but duplicates should generally be destroyed unless they otherwise have to be maintained under this Policy. For example, if a Word document is created by an employee and distributed to others, then the employee who created the Word document is responsible for compliance with this Policy. Those who possess duplicates of that Record can retain it as long as it is useful and does not exceed the applicable retention period, but are not obligated to retain it under this Policy unless a litigation hold is in place.

If an employee receives a Record from an outside source then that employee is the custodian of that Record and is responsible for handling that Record consistent with this Policy.

2. Electronic Data

The Company's IS Department is considered the controller of centrally maintained electronic data associated with certain business applications, enterprise systems and data warehouses. The IS Department is responsible for ensuring this centralized data is maintained in accordance with the Company Retention Schedule. Electronic data that is maintained on the system in the form of Word® documents, Excel® spreadsheets, PowerPoint® presentations, databases and other similar programs, will be retained by the IS Department pursuant to this Policy. Consequently, employees do not have to print off copies of every Record created on the Company servers in order to retain them under this Policy, but do need to manage the hard copy Records that they create or possess consistent with this Policy.

E-mail communications are to be treated in the same manner as electronic data for retention purposes. E-mails shall be retained on the company servers for one year. After one year any e-mails that are not otherwise preserved should be deleted.

While the IS Department will be responsible for ensuring that centralized data is maintained in accordance with the Company Retention Schedule, employees are still responsible for the content contained in the individual Records they create on those servers. Employees must also manage e-mail consistent with this Policy. If an employee believes that an e-mail, or its attachment(s), must be retained under this Policy then they should either print and retain the Records or move the Records to a personal folder. Emails moved to personal folders are not subject to the one year deletion cycle, but are subject to this Policy. For example, an e-mail that is preserved in a personal folder will be maintained as long as it remains in that personal folder, but should be deleted and disposed of if it is beyond the time period identified in the Retention Schedule and does not have to be otherwise maintained for legal or business reasons articulated in this Policy.

Any Records that are received on voicemail are not automatically backed up on the Company's servers. Consequently, any voicemail records that need to be retained pursuant to this Policy should be copied and retained.

3. Off-Site Storage

Records should be stored in an off-site storage facility when they are no longer necessary for day-to-day use, but need to be retained pursuant to this Policy. Records to be stored should be inventoried on a Records Transfer Form, grouped by year, labeled and transferred for appropriate storage.

4. Annual Review

The Company shall conduct an annual review (with the assistance of the DRT) of all Records maintained at their locations. Records that have exceeded their retention periods should be disposed of in accordance with Section V of this Policy. The disposal date for Records listed in the Retention Schedule is always December 31 of the year a Record is eligible for disposal. For example, if according to the schedule a Record should be destroyed five years after the current year, and is dated March 1, 2004, then it will be eligible for destruction on December 31, 2009.

D. Document Retention Team ("DRT")

The Company will assign a Document Retention Team ("DRT") composed of the Executive Director and Controller and Communications and Technology Manager, who will be responsible for ensuring compliance with this Policy and to provide support to the Departments, Regional Employees, and Communities. This team oversees the administration of this Policy for the company. The DRT shall advise employees of any changes to this Policy and of any litigation, audit, or investigations that may require retaining Records beyond their specified retention periods. The DRT will also act as a resource to employees who have Records retention questions. Additionally, the DRT shall be responsible for coordinating with the IS Department on the disaster recovery measures in place and understanding the information that is retained for

disaster recovery purposes. The DRT shall also address whether the schedules comply with legal, tax or related requirements regarding pending litigation and evaluate storage costs. The DRT shall also communicate, as needed, with senior management and shall meet with senior management on an annual basis regarding developments concerning this Policy.

V. HANDLING OF OBSOLETE RECORDS

During the Company's annual review of Records, those Records requiring destruction are to be handled in the following manner:

A. For Records stored at each Department, the Department Head, Executive Director or their respective designees, shall identify all obsolete Records in their possession or control that have exceeded the required retention period as designated in the Records Retention Schedule and shall insure the obsolete Records are properly destroyed. The DRT will provide support, as needed, during this process. Employees should also destroy any Records that no longer serve a business purpose and are not otherwise subject to retention under this Policy.

B. For Records located in off-site storage, the DRT shall be responsible for taking reasonable steps to support the Departments and determine whether any Records need to be maintained or destroyed. The DRT will annually circulate a list of the Records that will be destroyed within a particular Department to the respective Department Head for approval. The DRT will also work with Communities, where appropriate, on identifying Records that have been sent to off-site storage and that should be destroyed pursuant to this policy.

VI. LITIGATION HOLD ORDERS

In certain circumstances the President of ASHA or the Executive Director will instruct employees regarding Records or types of Records that must be retained due to pending or anticipated litigation. When these circumstances arise, the Company will (at the direction of the Legal Department) issue a Litigation Hold Order, which will direct certain employees to retain certain Records. This exception supersedes any previously or subsequently established destruction schedules for these Records. If an employee learns or believes that the Company will be the subject of pending or threatened litigation, subpoena or regulatory proceeding requiring the company to retain information, then that employee should contact the President of ASHA or the Executive Director.

If a Litigation Hold Order is no longer in effect the President of ASHA or the Executive Director will notify the custodians of Records that have been retained pursuant to the Litigation Hold Order. After the custodians are notified, those Records become subject to this Policy. Failure to comply with a Litigation Hold Order will subject the employee to disciplinary action, which could include termination.