



1. **Purpose.** This Policy establishes requirements for the retention and destruction of any form of recorded information of Destination Pet.

2. **Effective Date.** September 2024.

3. **Scope.** This Policy applies to all employees.

4. **Policy.**

4.1 **Records.** This Policy applies to all recorded information, including data stored on paper, other tangible medium, or electronically, that is created, received, or maintained by Destination Pet and its employees, including e-mails, letters, handwritten notes, and paper and electronic files containing data such as spreadsheets (“Records”).

4.2 **Retention of Records.** Destination Pet requires that Records be maintained and accessible for specific periods (“**Retention Periods**”) before the Records are eligible for destruction. The table below sets forth the Retention Period applicable to Records, based on the content of the Record, unless a longer retention period is required by a Legal Hold. Once the Retention Period for a Record expires, a Record may be eligible for destruction consistent with this policy, except those Records covered by a Legal Hold (as defined below) shall be retained for a longer period as instructed in the Legal Hold.

4.3 **Records on Legal Hold.** The Chief Legal Officer or a person designated by the Chief Legal Officer (“**Record Administrator**”) may determine that Records relevant to current or anticipated litigations, audits, investigations, or other matters be held for a longer period (“**Legal Hold**”). Failure to comply with a Legal Hold may result in criminal or civil penalties for Destination Pet. A Legal Hold instruction will identify the Records to be preserved, the individual responsible for preserving the Records, and how and where the Records are to be preserved. Records on Legal Hold must not be destroyed until specific approval is given by the Record Administrator.

4.4 **Determination of Retention Periods.** The Record Administrator is responsible for determining the retention period for Records and thus when the destruction of a Record or group of Records is appropriate. The table below sets forth that determination, with the exception that Records subject to a Legal Hold shall be retained for a longer period as instructed in the Legal Hold. The Retention Periods may be revised at any time by the Record Administrator.

4.5 **Method of Destruction of Records.** Every Record should be treated as if the Record contains highly sensitive information and must be destroyed according to industry standards applicable to the media type and Record content. When feasible, Records should be destroyed by a qualified vendor.

4.6 **Record Destruction Log.** A Record destruction log shall be maintained that includes all the following information:

- (a) Types of Records being destroyed, using categories from table below.
- (b) Date ranges of the Records.
- (c) Person or policy authorizing destruction.
- (d) Destruction method.
- (e) Destruction date.

4.7 **Duplicate Records.** When duplicate copies of a Record exist, the original Record shall be maintained for the full Retention Period and copies may be destroyed prior to the end of the Retention Period. If in doubt whether a Record is an original or copy, then treat the Record as an original and retain for the full Retention Period.

4.8 **Compliance.** Failure to comply with the terms of this Policy may result in corrective or disciplinary action. Any deviation from this Policy, including the lengthening or shortening of Retention Periods, must be approved in writing by the Record Administrator.

4.9 **Retention Periods.** The Retention Periods are as follows:

Record Type	Minimum Retention Period
Accounting and Finance	
Accounts payable ledgers, schedules, and invoices	7 years
Accounts receivable ledgers, schedules, and invoices	7 years
Annual audit reports and financial statements	10 years
Annual audit reports -- work papers related to audit	7 years after completion of audit
Annual plans and budgets	7 years
Asset listings	7 years
Bank and credit agreements	7 years after termination
Bank statements and cancelled checks	7 years
Credit card records	7 years
Credit memos and debit memos	7 years
Employee expense reports	7 years
General ledgers	10 years
Instructions to banks	7 years after ceasing to be effective
Interim financial statements	7 years
Investment records	7 years after sale of investment
Letters of credit	7 years after expiration
Management accounts	7 years
Notes receivable ledgers and schedules	7 years
Medical Records	
Client records (notes, diagnostic images, consultations, intake and consent forms, billing records)	7 years from last contact with animal

Record Type	Minimum Retention Period
Contracts	
General contracts and related correspondence	7 years after expiration/termination
Extraordinary contracts and related correspondence (e.g., acquisition agreements, closing books, etc.)	Permanent
Controlled Substances	
Controlled substances	<i>See “Controlled Substances” policy for Record retention requirements</i>
Corporate Records	
Corporate records (e.g., bylaws, corporate minutes, resolutions, articles of incorporation, operating agreements, stock transfer forms, circulars/meeting notices to shareholders, or certificates of authority)	Permanent
Directors’ service contracts	7 years after termination
Documents relating to issuances, allotments and conversions	Permanent
Insider lists	7 years
Letters of indemnity for lost certificates	Permanent
Licenses and permits	Permanent
Powers of attorney	12 years
Proxy forms/polling cards	7 years
Statutory returns	Permanent
Electronic mail (e-mail)	
Routine correspondence	3 years
Correspondence relating to claims	7 years after termination
Other non-routine correspondence	Retain according to the retention period for the underlying document type.
Health and Safety and Environment (“HSE”)	
Accident book	12 years
Electrical equipment inspection reports	7 years
Environmental permits, fire certificates, elevator certificates and other HSE authorizations	Permanent

Record Type	Minimum Retention Period
Fire maintenance log/fire risk assessment	Permanent
HSE inspection reports and related correspondence	7 years
HSE risk assessments	Permanent
HSE policies	12 years
Statement of health and safety policy	Permanent
Visitor logs	3 years
Insurance Records	
Annual loss summaries	10 years
Audits and adjustments	3 years after final adjustment
Certificates issued	Permanent
Claims files	Permanent
Group insurance plans	3 years
Inspections	3 years
Insurance policies	Permanent
Loss runs	10 years
Releases and settlements	10 years
Information Technology (“IT”) and Intellectual Property (“IP”)	
License certificates	3 years from last use
Software and hardware operating policies	3 years from last use
Descriptions of operating systems	5 years
Software listings and location of software copies	5 years
Hardware listings	5 years
Reports re: disaster recovery tests	5 years from test
Quotations, RFPs and evaluation spreadsheets	5 years
Status reports on IT implementation	5 years
Registered IP documents and applications	Permanent
Intellectual property agreements and licenses	12 years from expiration

Record Type	Minimum Retention Period
Intellectual Property Files (patents, trademarks, copyrights, correspondence with third parties regarding IP disputes, confidentiality agreements)	Permanent (or until determined to be obsolete by Chief Legal Officer)
Materials recording significant Company processes, developments and confidential information	Permanent
Legal Records	
Compliance policies	7 years
Compliance policy audits	7 years
Data room documents (acquisitions and dispositions)	1 year from expiration of applicable purchase agreement warranty or indemnity claim period or until outstanding related claims resolved (for employee names, except for 1 reference copy, names should be retained for 2 years from completion of transaction)
Diligence reports (acquisitions and dispositions)	7 years from expiration of applicable purchase agreement warranty or indemnity claim period or until outstanding related claims resolved.
Legal memoranda and opinions	10 years after close of matter
Litigation files (except court orders)	10 years after close of matter (including appeal)
Court orders	Permanent
Money laundering checks and records	7 years
Miscellaneous Records	
Business letters and correspondence apply the relevant category's retention period	5 years from date of last correspondence
Diaries	10 years
Inventory logs	5 years
Record destruction log	Permanent
Trade association materials	5 years

Record Type	Minimum Retention Period
Payroll Records	
Employee deduction authorization	7 years after termination
Payroll deductions	7 years after termination
W-2 and W-4 forms	7 years after termination
Garnishments, assignments, attachments	7 years after termination
Labor distribution cost records	7 years
Payroll registers	7 years
Timesheets	7 years
Unclaimed wage records	7 years
Personnel Records	
Company insurance benefit policies and details and explanation of benefits	7 years
COBRA records	7 years after termination
Disability, Maternity, Paternity and Sick Benefits Records	7 years
Employer information reports	7 years after superseded or filing
Employee earnings records	7 years after separation
Employee handbooks	Permanent
Employee personnel records (e.g., attendance, application records, withholding information, test results, training and qualification records, licensing and certifications)	7 years after separation
Employee separation and release agreements	10 years after separation
Job descriptions	7 years after superseded
Employment contracts	7 years after separation
Employee records for non-hired applicants, including correspondence	7 years
Equal opportunities records	7 years
Forms I-9	7 years
Long Term Disability Records	7 years
Profit sharing plan and incentive plans	10 years after plan termination

Record Type	Minimum Retention Period
Records related to employee service and eligibility for pension or employer and employee contributions to pension or profit-sharing plan	7 years after payment of last benefit/transfer out of plan
Redundancy plans	10 years after plan termination
Retirement and pension records	7 years if linked to a partially or wholly substantiated investigation; personal data to be immediately destroyed if entirely unsubstantiated claim
Whistleblowing reports and documents	10 years
Worker's compensation claims	10 years from the termination of employment
Property Records	
Property deeds, assessments, licenses, rights of way	Permanent
Property purchase/sale/lease agreement	Permanent
Property improvements/capital expenditure contracts	12 years from date of expiration (or until any claims settled if later)
Facilities management/maintenance contracts	12 years from date of expiration (or until any claims settled if later)
Property insurance policies	Permanent
CCTV/surveillance records	1 week
Risk Management	
Incident/accident reports	7 years
Reports created in contemplation of claims or complaints	7 years
Tax Records	
Tax exemption documents and related correspondence	Permanent
IRS rulings	Permanent
Excise tax records	7 years
Payroll tax records	7 years
Tax bills, receipts, statements	7 years
Tax returns (income, property)	Permanent

Record Type	Minimum Retention Period
Tax workpaper packages	7 years
Sales/use tax record	7 years
Tax certificates	Permanent
Annual information returns (federal, state)	Permanent
IRS or other government audit records	Permanent
State unemployment tax records	Permanent