

**HABIB ALRAHMAN
CHARITY
FOUNDATION
Record Retention Policy
11-2-2010**

1. Objective

The objective of this Record Retention Policy (“Policy”) is to ensure that HABIB ALRAHMAN CHARITY FOUNDATION (the “Organization”) complies with all applicable laws and regulations governing the management, retention, and destruction of the Organization’s records. For purposes of this Policy, the term “record” refers to (a) any recorded information, wherever such information is or may be stored, that has been created by or for the Organization, or received by the Organization in connection with the transaction of the Organization’s business that is (b) in any format (including, without limitation, paper, electronic, and audiovisual materials).

2. Record Retention

The Organization has determined that for statute of limitations or other reasons, certain records must be retained for specific periods of time. The record retention schedule attached as Exhibit A (the “Schedule”) provides the minimum retention periods under this Policy for a variety of categories of documents. Document types that are not listed, but are substantially similar to those listed in the Schedule should also be retained for the appropriate minimum retention periods. All documents designated as containing trade secret information, whether or not a trade secret of the Company, should be kept for at least the life of the trade secret. Generally speaking, all contracts retained should be in their final, executed form.

Electronic documents should be treated as if they were paper documents. Records may be retained in print or electronic form. Portable document format (“pdf”), faxed or scanned documents satisfy record retention requirements, provided that the authenticity of the original is not reasonably expected to be called into question. Email that needs to be retained should be either (a) printed in hard copy and kept in the appropriate file, or (b) downloaded to a computer file and kept electronically or on disk as a separate file.

HABIB ALRAHMAN CHARITY FOUNDATION’s Executive Director shall serve as the Organization’s Records Management Officer. The Records Management Officer is responsible for overseeing the implementation of, and compliance with, this Policy. Each director, officer, employee, consultant, or volunteer (“Covered Person(s)”) is responsible for maintaining the records that he or she originates, or otherwise receives, in accordance with such procedures and with this Policy, and for disposing of them following the expiration of the applicable retention period in accordance with the procedures outlined in Section 3. Covered Persons who are unsure about the need to keep a particular document should consult with the Records Management Officer.

The Records Management Officer shall make periodic reviews of the document retention mechanisms and storage capabilities of the Organization to ensure the proper maintenance, storage and back-up of the Organization's records.

3. Destruction of Records

Except as provided in Section 4, each covered Person shall dispose of all records following the expiration of the applicable retention period listed on the Schedule, unless (a) the Records Management Officer determines that a record must be retained for a longer period to comply with legal or other requirements or (b) the Covered Person who originates or receives the record or the Records Management Officer determines that retention of the record for a longer period otherwise serves a reasonable business purpose. The Records Management Officer shall promptly communicate to Covered Persons the decision to suspend or extend an applicable retention period for any of the Organization's records. A Covered Person need not maintain a copy of the record when the original or an official copy is maintained elsewhere. Non-electronic records shall be destroyed either by internal shredding or the use of a shredding or other relevant facility chosen by the Records Management Officer. Electronically stored information shall be discarded by permanent removal from all of the Organization's file servers, email servers, hard drives, storage networks or removable media, in accordance with the procedures developed by the Records Management Officer. The Records Management Officer shall circulate regular reminders to Covered Persons to promote timely compliance with this Section 3.

4. No Destruction of Records - Litigation and Investigation

No records of any type that may be related to an ongoing or imminent lawsuit or government investigation shall be destroyed and all ordinary disposal or alteration of records pertaining to the subjects of the litigation or investigation shall be immediately suspended.

Covered Persons who become aware of a legal matter (whether pending or threatened) involving the Organization should promptly notify the Records Management Officer so that the Organization can ensure the preservation of all records relating to that matter. If a Covered Person is uncertain whether documents under his or her control should be preserved because they might relate to a lawsuit or investigation, he or she should contact the Records Management Officer. Routine destruction of records may be reinstated once the investigation is terminated, mindful that records relating to an investigation may have an increased minimum retention period as specified on the Schedule.

5. Criminal Sanctions and Other Penalties

Failure to comply with this Policy, including interference with the retention or destruction of the Organization's records, may result in civil and criminal liability, as well as disciplinary action, up to and including termination from employment or resignation from the Board. Failure to maintain certain records may subject the Organization and/or individuals to penalties and fines and may compromise the Organization's position in litigation or an investigation. **It**

is also a federal crime to knowingly alter, destroy, mutilate, conceal, cover up, falsify or make a false entry in any record with the intent to impede, obstruct or influence the investigation or proper administration of a government investigation or proceeding.

Questions about this policy should be directed to the Records Management Officer at 314-764-4223