

Document Retention and Destruction Policy

Purpose:

The purpose of this Document Retention and Destruction Policy is to ensure that Freeway Ministries, Inc (the "Ministry") retains necessary documents for a legally required period and destroys documents that are no longer needed in an appropriate and timely manner. This policy also ensures that documents are maintained in accordance with Biblical stewardship and legal obligations, protecting the integrity and confidentiality of organizational information.

Scope:

This policy applies to all physical and electronic documents, records, and files created or received by the Ministry in the course of its operations, including documents stored in off-site locations or cloud-based systems.

Policy:

1. Document Retention

The following guidelines outline the retention periods for key types of documents. Documents must be retained for the specified periods, after which they should be securely destroyed.

- **Corporate Records**
 - Articles of Incorporation, Bylaws, and Amendments: Permanent
 - Board meeting minutes and resolutions: Permanent
 - Policies and Procedures: Permanent
- **Financial Records**
 - Audited financial statements: Permanent
 - General Ledgers and Chart of Accounts: Permanent
 - Tax Returns (IRS Form 990) and supporting documentation: 7 years
 - Bank statements, deposit records, and canceled checks: 7 years
 - Payroll records and expense reports: 7 years
- **Legal and Insurance Records**
 - Insurance policies and claims: Permanent
 - Contracts and agreements: 7 years after expiration
 - Litigation files: 7 years after final resolution
- **Donor Records**
 - Donor correspondence and acknowledgments: 7 years
 - Grant applications and contracts: 7 years after completion
- **Employee and Volunteer Records**
 - Employment contracts, performance evaluations, and disciplinary actions: 7 years after termination
 - Payroll and tax records: 7 years after termination
 - Background checks: 7 years after termination
- **Program and Ministry Records**
 - Program development and project reports: 7 years
 - Records of ministry services (e.g., counseling, outreach): 7 years

2. Document Destruction

When the retention period for a document has expired, it should be destroyed securely. Destruction methods should ensure that confidential or sensitive information cannot be recovered or accessed.

- **Paper records** should be shredded.
- **Electronic records** should be deleted in a manner that ensures they cannot be recovered (e.g., permanent deletion from servers and backup systems).

3. Suspension of Document Destruction (Legal Holds)

If the Ministry is involved in litigation or a government investigation, document destruction must be suspended for all relevant documents until legal counsel authorizes resumption. All employees must comply with any "legal hold" directives to prevent destruction or alteration of documents.

4. Electronic Records

The Ministry recognizes that many records are stored electronically. These records must be maintained and accessible for the duration of the applicable retention period. Backup procedures

must ensure that electronic records are preserved and retrievable.

5. **Responsibility**

The Ministry's **Executive Director** or [**Designated Officer**] is responsible for administering this policy and ensuring compliance. Staff and volunteers must understand which documents must be retained, for how long, and how to securely dispose of them when they are no longer needed.

6. **Compliance and Review**

This policy will be reviewed annually to ensure compliance with federal and state laws, including IRS requirements. Updates to the policy will be made as necessary.

Whistleblower Policy

Purpose:

In keeping with our commitment to integrity and transparency, Freeway Ministries, Inc. (the “Ministry”) is dedicated to ensuring that our operations are conducted in accordance with Biblical principles, legal requirements, and ethical standards. This Whistleblower Policy is intended to encourage and protect employees and volunteers who raise concerns about illegal, unethical, or improper actions without fear of retaliation.

Scope:

This policy applies to all employees, board members, volunteers, and contractors of the Ministry.

Policy:

1. Reporting Responsibility

All staff and volunteers of the Ministry have a responsibility to report any suspected misconduct, illegal activities, or unethical behavior that may harm the Ministry's reputation or operations. This includes, but is not limited to:

- Violations of federal, state, or local laws and regulations.
- Financial impropriety, fraud, or corruption.
- Breaches of organizational policies, including conflicts of interest and safety regulations.
- Any form of harassment, discrimination, or abuse.

2. Procedure for Reporting

Reports should be made as soon as possible. The whistleblower may report concerns anonymously if they choose, though providing contact information can help the Ministry follow up more effectively. Reports can be made to:

- The **Executive Director** or **Board Chair**.
- Michael Aye at mikeaye@crosswaybc.org.
- If the concern involves the Executive Director or Board Chair, the report should be made directly to the Board of Directors.

3. No Retaliation

No individual who, in good faith, reports a violation or concern shall suffer harassment, retaliation, or any adverse consequences. Retaliation against any person who has reported a concern in good faith is a violation of this policy and will be subject to disciplinary action.

4. Investigation

All reported violations or concerns will be promptly and thoroughly investigated. The confidentiality of the whistleblower will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation.

5. Acting in Good Faith

Anyone filing a report must act in good faith and have reasonable grounds for believing that the information disclosed indicates misconduct or violation of the Ministry's policies. Any allegations found to be knowingly false or made maliciously will be viewed as a serious offense and may result in disciplinary action.

6. Compliance

The Ministry will comply with all relevant laws and regulations concerning whistleblower protections.

7. Acknowledgment

All employees, volunteers, and stakeholders are required to review and acknowledge understanding of this policy.

Conflict of Interest Policy

Purpose:

As a Christ-centered nonprofit ministry, Freeway Ministries, Inc. is committed to honoring Christ through integrity, transparency, and stewardship. This Conflict of Interest Policy is designed to protect the ministry's interests when it is contemplating entering into a transaction or arrangement that might benefit the private interests of an officer, director, or key employee. The policy ensures that all decisions are made in the best interests of the ministry, free from undue influence or personal gain.

Scope:

This policy applies to all board members, officers, employees, volunteers, and other representatives of the ministry who are in a position to make decisions on behalf of the organization.

Policy:

1. Definition of Conflict of Interest

A conflict of interest arises when a person in a position of authority over the ministry (e.g., board member, officer, employee, or volunteer) could benefit financially, personally, or relationally from a decision made on behalf of the ministry. Conflicts may occur when:

- The individual, or a family member, has an existing or potential ownership or investment interest in any entity with which the ministry has, or is considering, a transaction or arrangement.
- The individual receives compensation, gifts, or favors from an entity or individual that does, or seeks to do, business with the ministry.
- The individual's loyalty to the ministry is compromised due to a financial interest or other personal relationship.

2. Duty to Disclose

In connection with any actual or potential conflict of interest, any individual subject to this policy must disclose the existence and nature of the conflict as soon as it arises. This disclosure must be made to the Board of Directors or an authorized committee.

3. Procedures for Addressing a Conflict of Interest

- After disclosure of a potential conflict of interest, the individual with the conflict shall recuse themselves from any discussion or decision-making process related to the matter.
- The Board or committee may investigate alternatives to the proposed transaction or arrangement that would avoid the conflict.
- If a more advantageous transaction or arrangement is not reasonably attainable, the Board may determine by a majority vote (excluding the interested individual) whether the transaction is in the ministry's best interest, for its benefit, and whether it is fair and reasonable. If so, they may approve the transaction.
- The minutes of the meeting shall document the disclosure, the discussion, and the decision-making process.

4. Compensation

- No board member or voting member of a committee whose jurisdiction includes compensation matters shall participate in decisions regarding their own compensation or the compensation of any family member.
- When compensation is being considered, the Board must obtain and rely on appropriate data (e.g., salary surveys or compensation studies) to ensure that compensation is reasonable and fair.

5. Annual Statements

Each board member, officer, and key employee must annually sign a statement which affirms that:

- They have received a copy of this Conflict of Interest Policy.
- They have read and understand the policy.
- They agree to comply with the policy.
- They understand that Freeway Ministries, Inc. is a 501(c)(3) charitable organization and must engage primarily in activities that accomplish its tax-exempt purposes.

6. Violations of the Conflict of Interest Policy

If the Board or a committee has reasonable cause to believe that an individual has failed to disclose a conflict of interest, they shall inform the individual and give them an opportunity to explain the alleged failure. If, after investigation, the Board determines that the individual knowingly failed to disclose a conflict, appropriate disciplinary and corrective action will be taken.

Biblical Foundation:

As a ministry, we are called to conduct ourselves in a manner worthy of Christ's example. Scripture teaches us the importance of integrity and transparency (Proverbs 11:3; 2 Corinthians 8:21). This policy is grounded in our desire to honor God through the faithful stewardship of the resources and opportunities entrusted to us.