Unison Risk Advisors
Records Retention Policy and Schedule
Effective 1.1.2025

OVERVIEW

This document outlines the roles & responsibilities of Unison Risk Advisors Inc. (“URA”) and each platform company in the Unison Risk Advisors family of companies (each a “Platform”) for the retention and disposition of data and documents in all formats (the “Policy”). URA and Platforms are collectively referred to as “Company”.

1.0 PURPOSE

The purpose of this Policy is to provide specific guidelines for the retention and management of all Company documents and records.

2.0 SCOPE

This Policy supersedes all prior document retention policies and schedules as of the effective date. Compliance with this Policy is every employee’s responsibility. The Policy will be maintained on the respective Platform’s intranet for viewing by its respective employees.

This Policy applies to all Company documents and records, which includes almost everything that you produce as an employee, including but not limited to expense records, client records, memoranda, email, appointment books and calendars. All corporate documents and records in connection with the Company’s business operations, wherever located (both on and off Company premises) are the property of the Company. Company documents and records may be used in legal proceedings and all such documents and records may be searched-for and reviewed by management at any time, without notice. In addition, all documents and records stored on Company premises or in its electronic systems may be searched-for and reviewed by management at any time, without notice, for the purpose of ascertaining whether they are documents and records of the Company or for any other legitimate purpose.

This Policy covers documents and records retained both in electronic format (including emails, voicemails and documents contained in portable devices such as laptops, smart phones, tablet computers, USB keys, etc.) as well as hardcopy documents and records in printed form regardless of whether they are stored onsite or offsite, including documents and records that might be stored at employee's homes, on home computers or other personal electronic devices, or that might be stored by a third-party service provider.

A document or record in electronic or digital form should be retained for the same period as the equivalent document or record in printed form.

3.0 POLICY

It is the policy of the Company to comply with applicable law. Accordingly, documents and records must be retained for the longer of the applicable retention period in the schedule below or the period required by applicable law.

Additionally, all retention periods are suspended and employees cannot delete, dispose, destroy or change any documents or records if an employee believes, or the Legal Department informs them, that certain records are relevant to current or reasonably anticipated litigation, a subpoena, government investigation, criminal matter or investigation, or audit. Additionally, the employee must suspend any auto-delete functions for electronic documents or records. Both you and the Company may be subjected to civil or other penalties for non-compliance.

If you have any question as to whether or not to disposition a record, please contact the Chief Administrative Officer or General Counsel of URA for clarification.

4.0 COMPLIANCE

Failure to comply with this Policy may result in discipline up to and including termination of employment in addition to other penalties discussed in section 3 above.

DOCUMENT TYPE	RETENTION PERIOD
CORPORATE and LEGAL RECORDS	
Corporate and Organizational documents (e.g. Articles, Bylaws, Minutes, Operating Agreements, Copyright, Trademark)	Permanent
Contracts – non-client (e.g. Vendor, Leases, Carrier, Contractor, Agency, Producer/Appt, NDAs)	7 Years After Termination
Corporate Insurance and Reinsurance Policies	5 years (claims made policies); Permanent (occurrence policies, life policies, and bonds)
Licenses (Corporate or Individual)	7 Years After Termination of Business, Employment or License
Litigation & Regulatory Files	Permanent (Settlement Agreement); 7 years (File Materials and Subpoena/Regulatory Responses)
Deeds/Real Property Purchase Agreements	Permanent
Stock/Dividend Ledger, and Stock Options and Incentive Plans	Permanent
P&C, GROUP BENEFITS, SURETY, LIFE & RPS	
Substantive Client Communications, Documentation, Policies, Binders, and Files	7 Years After Client Relationship Ends (occurrence policies, life policies, and bonds are Permanent)
Client Fee and Consulting Agreements, Engagement Letters, and Other Client Agreements (e.g. BAA, NDA)	7 Years After Client Relationship Ends
Business not awarded - Proposals, RFP responses, Quotes	5 years
Retirement Plan Services	Applicable Retention Schedule (Broker-Dealer or RIA)

TPA SERVICES	
All Substantive Claim Related Documents Including Claim Files and Communications, Claim and Services Payment/Invoicing	7 Years After Client Relationship Ends for Electronic Files; 7 years From Later of Claim Closure or Last Payment for Legacy Paper Files
Business not awarded - Proposals, RFP responses, Quotes	6 years
CLAIMS & LOSS CONTROL	
All Claim Related Documents Including Claim Files and Communications; Customer Visit Reports; Loss Analysis; Engineering Reports; Loss Control Audits	7 Years After Resolution of Claim Or Loss Control Audit/Recommendation
INFORMATION TECHNOLOGY	
Disaster Recovery Plan	Until superseded plus 3 years
Source Code	12 months of codebase (all revisions)
Email (general, not in any other category, and not subject to legal hold)	24 months (individual inbox); 7 years total (archived)
HR / BENEFITS RECORDS	
Employee Personnel and Discipline File (including employment, stock or other agreements)	7 Years after Termination
Corporate Benefits Documents; Payroll Records by Pay Period & Annual Payroll Report/Register	7 Years
ERISA Plan Documents (including 401(k), ESOP/Pension/Retirement)	7 Years after Plan Termination
Assessments and Audits	Until Superseded
Job Applications, Resumes and Related Documents (not hired)	7 Years
I9	Later of 3 years from employee's hire date or 1 year from termination

ACCOUNTING & FINANCE	
1099s	7 Years
Account Reconciliations (Balance Sheet Management)	7 Years
Accounts Payable Invoices (Vendor & Carrier) / Return Premiums	7 Years
Accounts Payable Year End Ledgers, Cash Disbursement Registers	7 years
Accounts Receivables Invoices	7 Years
Accounts Receivables Year End Ledgers, Cash Receipt Registers	7 years
Annuity/Deferred Payments	Permanent
Audit Work Papers	7 Years
Financial Statements/Management Reports (internal)	7 Years
Audit Reports and Related Documents	Permanent
Bank Deposits/Statements	7 years
Bank Reconciliations	7 Years
Budgets	4 Years
Cancelled Checks	General (7 years); Taxes (Permanent)
Capital Asset Records and Depreciation Schedules	10 years from sale, disposal or termination of contract
Commission Statements (Direct Bill)	3 Years
Expense Reports	7 Years
General Ledger (and supporting documents)	7 Years
Corporate Investment Portfolio	5 Years after Disposal of Asset
Consultant Reports/Appraisals	Permanent
Promissory Notes	7 Years After Payment
Surplus Lines Filings, Excise Tax Filings, and Property Tax Filings and Related Documentation	7 Years
Financial Integration Data (M&A)	7 Years
Tax Returns and Supporting Documentation	7 Year