

DOCUMENT ADMINISTRATION

| VERSION NUMBER | APPROVAL PROCESS | DATE |
|----------------|---|--|
| 1.0 | Prepared by: Governance | March 2009 |
| | Reviewed by: Gavi Audit and Finance Committee Gavi Governance Committee | 23 March 2009 15 April |
| | Approved by: Gavi Board | 2-3 June 2009 Effective from: 3 June 2009 |
| 2.0 | Revised by: Internal Audit | |
| | Reviewed by: Gavi Audit and Finance Committee | 11 March 2010 |
| | Approved by: Gavi Board | 16-17 June 2010 Effective:17 June 2010 |
| | Next review: | As and when required |
| | Terminology review update | 15 February 2025 |

1. Purpose

- 1.1. The Gavi Alliance is committed to being a transparent and accountable organisation. As such, the Document Retention Policy shall govern the preservation and, where applicable, permissible destruction of certain Gavi Alliance documents. It is intended to meet recognised practices and accounting standards for retention periods and to provide guidance on the circumstances which could require longer or indefinite periods of document preservation.

2. Definitions

- 2.1. Terms found in this policy shall have the same meaning as they do within the Gavi Alliance Statutes and Board and Board Committee Operating Procedures. Further, the following definitions shall apply:
 - **“Records”** - all finalised documents, reports, diagrams, correspondence, emails, and other physically or electronically stored material, and other business records regardless of where they are located or stored, including those stored in a desk drawer, office, file cabinet, record center, hard drive, personal computer or lap-top, or off-site location.
 - **“Archiving Team”** – The Secretariat team responsible for preserving a pertinent final Record.
 - **“Retention Period”** – the length of time a final Record must be preserved after it has been archived.

3. Retention

- 3.1. Each member of the Secretariat who generates Records described in Attachment 1 is responsible for submitting it to the Archiving Team which in turn is responsible for placing it in the appropriate physical or electronic archive. Draft, unfinalised versions of Records do not need to be retained.
- 3.2. A Record must be preserved for at least the Retention Period. Further, every member of the Secretariat is prohibited from destroying, materially altering, or deleting any Record until the expiration of the Retention Period. Only a member of the pertinent Archiving Team may delete a Record after the expiration of the Retention Period.

4. Extension of Retention Period

- 4.1. If a member of the Secretariat believes or is informed that a Record is or may be the subject of litigation, or pertaining to a claim, audit, investigation or enforcement action, then the Record cannot be destroyed, altered in any way, or deleted and must be kept until the General Counsel (or the Secretary in the case of Board and Board Committee Packs and Minutes) in his/her sole discretion determines that the Record is no longer needed at which point the retention period shall be reset.

5. Disclosure to Third Parties

- 5.1. Nothing in this policy is deemed to waive any Gavi Alliance privilege or immunity, including the archive privilege. Before disclosing any Record to an outside party in connection with any litigation, claim, audit, investigation or enforcement action, a

member of the Secretariat shall consult with a member of the Legal Team about the applicability of the archive privilege.

Attachment 1

| Record | Retention Period | Archiving Team |
|---|------------------|---------------------------------------|
| Accounts payable ledgers and schedules | 7 years | Office of the Chief Financial Officer |
| Audit reports | Permanently | Office of the Chief Financial Officer |
| Bank reconciliations | 2 years | Office of the Chief Financial Officer |
| Bank statements | 3 years | Office of the Chief Financial Officer |
| Board and Board Committ Packs and Minutes | Permanently | Secretary/Governance Team |
| Checks | Permanently | Office of the Chief Financial Officer |
| Contracts, notes and leases after expiration | 7 years | Legal |
| Deeds, mortgages and bills of sale | Permanently | Legal |
| Depreciation schedules | Permanently | Office of the Chief Financial Officer |
| Employment applications | 5 years | Human Resources |
| Year End Financial Statements | Permanently | Office of the Chief Financial Officer |
| Insurance policies (expired) | 3 years | Legal |
| Insurance records, accident reports, claims, policies | 7 years | Legal |
| Internal audit reports | Permanently | Audit & Investigations |
| Internal audit workpaper files | 7 years | Audit & Investigations |
| Inventories of products, materials and supplies | 7 years | Office of the Chief Financial Officer |
| Invoices (expired) | 7 years | Office of the Chief Financial Officer |
| Leases (expired) | 3 years | Legal |
| Legal files | 10 years | Legal |
| Marketing and related sales documents | 7 years | Public Engagement & Info Services |
| Payroll records and summaries | 7 years | Human Resources |
| Personnel files | 5 years | Human Resources |
| Press releases | Permanently | Public Engagement & Info Services |
| Retirement and pension records | Permanently | Human Resources |
| Tax return and worksheets | Permanently | Office of the Chief Financial Officer |
| Timesheets | 7 years | Human Resources |
| Trademark registrations, copyrights, intellectual property, trade | Permanently | Legal |
| Withholding tax statements | 7 years | Human Resources |