

coats
ADA

AMMCO

DATE: October 15, 1995

TO: Distribution

FROM: Robin Counts

RE: Record Retention Policy and Procedures

Attached please find a copy of the company's Record Retention Policy. There has been no change to the policy and you may already have a copy. I am reissuing it because we have so many new people and I have been asked several questions. Listed below are some important items to remember with regard to record retention:

RETENTION TIME GUIDELINES

The retention times that are given are only guidelines. If you need to keep something for a longer period of time, that is fine. If you would like to shorten a retention time that you believe is excessive, please see me. We may be able to do it but we must be sure that all legal requirements are met.

CARTON LABEL INSTRUCTIONS

It is important that the carton label instructions be followed to the letter. If you have any questions, please feel free to contact me. If the labels are filled out correctly, it is simple to identify your boxes and have them back on sight for you in a matter of hours. I have attached a copy of a sample label with some additional specifics on exactly how to complete each box.

RETRIEVAL OF RECORDS

All requests for boxes of records to be either picked up or delivered need to be directed to me. It is important for the safety and confidentiality of your records that there is only one person coordinating the retention effort.

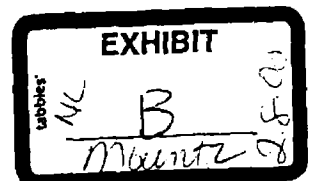
If you have additional questions that have not been addressed here, please let me know.

Thanks,



HENNESSY INDUSTRIES, INC.

P. O. Box 3002, 1601 J. P. Hennessy Dr., LaVergne, TN 37086-1982 615/641-7533 800/688-6359
HENNESSY INDUSTRIES, INC. Manufacturer of AMMCO®, COATS® and BADA® Automotive Service Equipment and Tools.



Approval:	HENNESSY CORPORATION, INC. CORPORATE POLICY MANUAL POLICIES AND GUIDELINES	DATE ISSUED	PAGE NUMBER
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President		DATE REVISED	CHAPTER/SECTION

SUBJECT: RETENTION OF RECORDS

1.0 OBJECTIVE

Establish the responsibility, authority, rules, procedures for the retention of records.

2.0 SCOPE

The Corporation, its divisions and subsidiaries.

3.0 POLICY

The policy of this Corporation is one of strict observance of the laws applicable to its business. As such, this corporation will retain and preserve all records required by law, and will manage such retention and preservation in a n efficient manner consistent with sound business practices.

4.0 DEFINITIONS

4.1 RECORDS: Any document or other medium by which data or information are recorded and/or stored.

4.2 CURRENT FILES: Those files requiring repeated access throughout the year.

5.0 SOURCE MATERIAL

There are various sources for use in evaluating legal and administrative requirements for record retention. A principal source within the United States is: "GUIDE TO RECORD RETENTION REQUIREMENTS" which is published annually by the General Services Administration. The current edition is dated January 1, 1989. This "Guide" supplements a basic source which is "The Federal Register", Volume 23, Appendix a., May 13, 1958. Local chapters of the Association of Records Management or equivalent would also be a source of assistance in records retention to meet local requirements.

6.0 RESPONSIBILITY and AUTHORITY

All Functioning Vice Presidents.

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7.0 RULES

- 7.1 Records should not normally be maintained as current files in the work area beyond two years.
- 7.2 The destruction of records will be based upon the Retention Schedule. Records will not be stored in any other manner, e.g., microfilm, punched card, tape, etc. following expiration of the period of retention.
- 7.3 Destruction shall be carried out by approved methods, such as shredding, burning or mutilation as may be appropriate. Disposition of records in readable or retrievable form is not authorized.

RETENTION SCHEDULE

1.0 GENERAL

Records should not be maintained in the work area in excess of two years. Each supervisor is responsible for conducting a review of the work area at the end of each year to insure that documents that have been in the work area for two years are either destroyed or, if they meet the other retention criteria described herein, are transferred to the storage center in accordance with the specific retention schedule code.

2.0 CARTON LABEL INSTRUCTIONS

Records not maintained in the work area will be cataloged and stored at Accelerated Courier, Inc. The following instructions for carton labeling should be read and followed carefully.

3.0 RETENTION SCHEDULE

The retention periods refer to the number of calendar years after the calendar year in which the record was generated.

NOTE: Classifications are general and records have often been listed in only one area of responsibility to avoid conflict and duplication. Records managers should use discretion in retaining or destroying records.

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CARTON LABEL INSTRUCTIONS

1. The carton labels **MUST** be typed or filled out with a ballpoint pen.
2. The label backer or carrier must be returned to Accelerated Records Management as we use this to enter carton data into our system.
3. All date fields must be in the format MM/DD/YY.
4. All labels areas have a maximum number of characters as follows:

A. CUSTOMER (Normally preprinted)	20
B. CUSTOMER CARTON NUMBER	15
C. DIVISION	20
D. DEPARTMENT	20
E. DESCRIPTION #1 & #2 (each)	40
F. FILED BY	20
G. FROM, TO AND DESTRUCTION DATE (MM/DD/YY)	8
H. DATE INTO STORAGE AND WAREHOUSE LOCATION (ACCELERATED USE ONLY!!)	
5. The only exception to the above is Destruction Date. This can be NONE, NEVER, etc.
6. Any areas left blank will not be input. Should you wish these to be added or errors corrected at a later date, there may be additional charges for the time spent doing so. It pays to fill out the labels as completely and accurately as possible.
7. After filling out the label, peel it off the backer and stick it on the carton firmly. Remember, the backer **MUST** be returned to Accelerated.
8. Names for the same Division or Department must be spelled exactly the same. Otherwise cartons for like Divisions or Departments will not appear together on your Master List. For example, 'Accts. Payable' and 'Accounts Payable' would not be the same Department on the Master List.
9. All voided labels must be returned to Accelerated in order to maintain carton number control.

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CARTON LABEL INSTRUCTIONS

10. If your labels are hand written, please insure that they are as legible as possible. This will assure that we input the correct carton information.

CEO	GENERAL CORRESPONDENCE	01
	POLICY CORRESPONDENCE	03
	APPOINTMENTS, RESIGNATIONS	99
	DIRECTIVES, SPEECHES, POLICY STATEMENTS	05
	REPORTS	04
	DELEGATIONS	05
CFO	GENERAL CORRESPONDENCE OF THE CFO	01
	POLICY CORRESPONDENCE OF THE CFO	03
	BALANCE SHEETS, PROFIT AND LOSS STATEMENTS	07
	CAPITAL ASSET RECORDS.	
	This includes: Appraisals, Asset ledgers, Appropriation records, Journal vouchers, Property records, Plant records, Approval documents, Disposal documents, Transfer records	NONE
	FEDERAL GOVERNMENT REPORTS	
	(SEC, 10Q, 10K - including correspondence related thereto)	NONE
	FINANCIAL DATA	
	(Monthly, Quarterly, Annual Operating Statements not certified)	02
	CERTIFIED FINANCIAL STATEMENT	NONE
	AUDIT REPORTS (Independent)	NONE
	ACCOUNTS PAYABLE DOCUMENTS	
FNP - FINANCIAL PLANNING	This includes: Ledgers, Monthly Statements, Invoices, Analyses, Correspondence	07
	FORECASTS, REPORTS, PLANTS, AND SUPPORTING DATA	
	Acquisitions, etc. (See Corporate Development)	01
PLANNING	REPORTS, ANALYSES, PLANS, EVALUATIONS	
	Adopted	07
	Rejected	02

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CORPORATE DEVELOPMENT		
GENERAL CORRESPONDENCE		01
ACQUISITIONS/MERGERS		
Includes Analyses, Evaluations, Legal Reviews, Financial Reports, Correspondence related thereto)		NONE
MARKET/PRODUCT DEVELOPMENT		
Request Approved (after completion)		08
Rejected		02
BUDGET	BUSINESS PLANS - Individual Company and Consolidations	01
ACCOUNTING		
GENERAL BOOKS OF ACCOUNT		
General Ledger & Journal Entries		NEVER
Supporting Vouchers, Documents, and Correspondence; Summaries, Analyses. Correspondence covering: Sales, Receipts Disbursements, Purchases of Material, Labor, Overhead Costs		07
METHOD AND COMPUTATION OF:		
Inventories, Cost of Sales, Depreciation, and Amortization of Assets, Sales, General and Administration Expenses, Schedules of same		02
Cash Disbursement Records		07
Cash Receipts Records		07
Cashier Records and Reports		07
Check Register		07
Petty Cash Register		02
Voucher Register		02
Requisitions		01
Cancelled Checks		
Dividend and Payroll		07
All Other		07
General Agreements, Contracts, Instructions (after termination)		07
Loan Agreements, Trusts, Mortgages, Other Financial Agreements (after termination)		07
Bank Deposit Slips and Supporting Documentation		
Bank Statements and Reconciliations		07
Financial Records Relating to Foreign (non U.S.) Accounts of U.S. Entities, Foreign Currency, etc.		07

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ADVERTISING			
DRAWINGS and ARTWORK			07
ADVERTISING LAYOUTS (Note: Categories include Correspondence, Approvals, Rejections, and Reports)			03
OTHER DATA RETAINED AS REQUIRED			
RESEARCH & ENGINEERING			
GENERAL CORRESPONDENCE			01
POLICY CORRESPONDENCE			02
PRODUCT DOCUMENTATION - After Part Number is Obsoleted			02
CENTRAL PROJECT FILES - After Product is Obsoleted			02
LAB NOTEBOOKS			10
MANUFACTURING			
GENERAL CORRESPONDENCE			01
ACKNOWLEDGEMENTS TO SUPPLIERS			03
CREDIT MEMOS, PURCHASE			07
DEBIT MEMOS, PURCHASE			07
PURCHASE REQUISITION			07
RECEIVING REPORTS			07
BILLS OF MATERIAL			07
CAPITAL EXPENDITURE RECORDS			07
SHIPPING RECORDS			07
SUPPLIER CLAIMS, SETTLED			07
PURCHASE ORDERS, JOURNALS and RECORDS			07
INSPECTION RECORDS			07
QUALITY CONTROL RECORDS			07
WARRANTY CLAIMS			NEVER
SERVICE REPORTS, PRODUCT			07
RETURNS FOR CREDIT			07
PARTS ORDERS BY PRODUCT MODELS			07
TEST REPORTS			07
BILLS OF LADING			07
FREIGHT BILLS			07
FREIGHT CLAIMS			07
TARIFFS/REGULATIONS			07
VEHICLE OPERATIONS AND MAINTENANCE RECORDS			07

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RETENTION OF RECORDS

MARKETING: MARKETING & SALES

GENERAL CORRESPONDENCE	01
POLICY CORRESPONDENCE	03
CATALOGS, BROCHURES, ETC., (one copy, other copies as needed)	02
CONTRACTS, TERMINATED	07
COST ESTIMATES	07
ESTIMATES	07
MARKET SURVEYS AND DATA	
PRICE QUOTATIONS	02
PRICE SHEETS	02
SALES ANALYSES (Hardcopy)	02
SALES REPORTS (Hardcopy)	02
SERVICE REPORTS	07
PROMOTION RECORDS	02
SALES OFFICE REPORTS, INSPECTIONS, EVALUATIONS	02
CALL REPORTS	02
DISTRIBUTION/AGENT EVALUATION, APPOINTMENT AND	
CANCELLATION, AGREEMENTS, CORRESPONDENCE	07
CREDIT EVALUATIONS	07
CLAIMS, etc., SETTLED	07
CONTRACT FORMS, WARRANTIES, etc., and OTHER SELLING	
DOCUMENTS (one copy)	07
EXPORT RECORDS	07
SERVICE RECORDS	07

CPO - OVERSEAS MANAGEMENT

GENERAL CORRESPONDENCE	01
POLICY CORRESPONDENCE	02
DISTRIBUTOR AGREEMENTS, TERMINATED	02
DISTRIBUTOR CORRESPONDENCE, EVALUATIONS, APPOINTMENTS,	
CANCELLATIONS	02
STATISTICAL REPORTS/STUDIES	02
LICENSE AGREEMENTS	02
SALES AGREEMENTS	02
ORGANIZATIONAL DOCUMENTS	02
CONTRACTS, LEASES (After Termination)	02

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DATA PROCESSING

GENERAL CORRESPONDENCE	01
POLICY CORRESPONDENCE	03
CONTRACTS and LEASES	07
DATA PROCESSING PROPOSALS (After Implementation)	07
DOCUMENTS RETAINED AS REQUIRED UNDER AGREEMENTS WITH GOVERNMENT AND IN CONSULTATION WITH TAX AS NECESSARY	07

ADMINISTRATIVE

GENERAL CORRESPONDENCE	01
POLICY CORRESPONDENCE	02
AGREEMENTS, EXPIRED	07
CONTRACTS, EXPIRED	07
DEEDS, RELATED REAL ESTATE DOCUMENTS	07
LEASES, EXPIRED	07
LICENSES	07
LICENSE AGREEMENTS	07
REPORTS, ANNUAL (10 copies)	07
RETENTION PERIOD REQUESTS	07

SECRETARY

GENERAL CORRESPONDENCE	01
POLICY CORRESPONDENCE	02
ANNUAL REPORTS	
250 COPIES	05
50 COPIES	07
10 COPIES	07
BOARD OF DIRECTORS, MINUTES (supporting documentation)	NEVER
BY-LAWS	
CORPORATE/SUBSIDIARY	NEVER
COMMITTEE MEETINGS, BOARD OF DIRECTORS	NEVER
CORPORATE RECORDS, PARENT, SUBSIDIARY (Current & former)	
Correspondence relating thereto	NEVER
DIVIDEND LISTS	NEVER
LISTING APPLICATIONS	NEVER

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SECRETARY-continued

MERGERS and CONSOLIDATIONS	NEVER
PERMITS TO DO BUSINESS	NEVER
PROXIES	NEVER
STOCK BOOKS	NEVER
STOCK CERTIFICATES, CANCELLED	NEVER
STOCK TRANSFER RECORD	NEVER
STOCKHOLDER VOTING LISTS	NEVER
SURVEYS and MAPS - REAL ESTATE TITLES, PROOF THEREOF, APPRAISALS, DEEDS	NEVER

IRP-INDUSTRIAL RELATIONS & PERSONNEL

GENERAL CORRESPONDENCE	01
POLICY CORRESPONDENCE	02
ACCIDENT and ILLNESS REPORTS, CLAIMS and SETTLEMENTS (after settlement) and OSHA REPORTS	07
APPRAISALS, EMPLOYEE, AFTER SEPARATION	07
ASSIGNMENTS, GARNISHMENTS, ATTACHMENTS OF EMPLOYEE WAGES SATISFIED	07
COMPENSATION RECORDS OF EMPLOYEES, AFTER SEPARATION, DEDUCTION AUTHORIZATIONS	07
EMPLOYEE RECORDS:	
APPLICATION, INTERVIEWS, COMPENSATION, EVALUATIONS, INSURANCE, SAVINGS AND SECURITY FORMS, REQUISITIONS, PAYROLL CHANGES, PENSIONS DATA, CHANGE OF STATUS, WITHHOLDING CERTIFICATES (W-4's) and CORRESPONDENCE RELATING THERETO AFTER SEPARATION	07
EMPLOYEE CURRENT RECORDS:	
PAYROLL REGISTERS, JOURNALS, EARNINGS, STATEMENTS, W-4's, CHANGES GARNISHMENTS, CORRESPONDENCE RELATED THERETO AND ALL RELATED DOCUMENTS	NEVER
EMPLOYEE PENSION RECORDS (CURRENT):	
REGISTER, JOURNALS, EARNINGS RECORDS, CHANGES CORRESPONDENCE RELATED THERETO	07

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IRP-INDUSTRIAL RELATIONS & PERSONNEL-continued			
FEDERAL REPORTS, RECORDS, CERTIFICATIONS, and			
SUPPORTING DATA REQUIRED UNDER ERISA (after filing date)			07
EMPLOYEE PENSION RECORDS (DECEASED AND PAID UP)			07
LABOR NEGOTIATIONS (CORRESPONDENCE RELATED THERETO)			07
MEDICAL RECORDS OF EMPLOYEES - CURRENT			NEVER
MEDICAL RECORDS OF EMPLOYEES - AFTER SEPARATION			07
SAFETY OR INJURY FREQUENCY RECORDS			07
SALARIES and WAGE RECORDS, CURRENT EMPLOYEES			NEVER
SALARIES and WAGE RECORDS, SEPARATED EMPLOYEES			07
INSURANCE			
CONTRACTS, POLICIES, CORRESPONDENCE CURRENT			01
CLAIMS and LITIGATION RECORDS			07
POLICIES EXPIRED			
NO CLAIMS PENDING			07
CLAIMS PENDING - AFTER SETTLEMENT			07
GOVERNMENT AFFAIRS			
GENERAL CORRESPONDENCE			01
POLICY CORRESPONDENCE			02
REPORTS, AGREEMENTS (AFTER TERMINATION)			07
LEGAL			
GENERAL CORRESPONDENCE			01
POLICY CORRESPONDENCE			02
LEGAL SUFFICIENCY REVIEWS:			
SALES CONTRACTS			07
EMPLOYMENT CONTRACTS			07
DISTRIBUTOR AGREEMENTS			07
AGENT AGREEMENTS			07
LICENSE AGREEMENTS			07
OPINION LETTERS			07
LITIGATION RECORDS			07
OTHER DOCUMENTS			07

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PATENTS & TRADEMARKS			
GENERAL CORRESPONDENCE			01
POLICY CORRESPONDENCE			02
COPYRIGHTS and RELATED RECORDS, ANALYSES, CORRESPONDENCE		UNTIL EXPIRATION	
PATENTS and RELATED RECORDS, REVIEWS, CORRESPONDENCE		UNTIL EXPIRATION	
LICENSES, RELATED RECORDS, REVIEWS and CORRESPONDENCE (AFTER TERMINATION)		UNTIL EXPIRATION	
TRADEMARKS and RELATED RECORDS, REVIEWS, and CORRESPONDENCE		UNTIL EXPIRATION	