

## DOCUMENT RETENTION POLICY

The corporate records of MaxFund Inc and its subsidiaries (hereafter the "Company") are important assets. Corporate records include essentially all records you produce as an employee, whether paper or electronic. A record may be as obvious as a memorandum, and e-mail, a contract or a case study, or something not as obvious, such as a computerized desk calendar, an appointment book or an expense record.

- (a) Tax Records Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues. Tax records must be retained for at least six years from the date of filing the applicable return.
- (b) Employment Records/Personnel Records. State and federal statutes require MaxFund Inc to keep certain recruitment, employment and personnel information. MaxFund Inc. should also keep personnel files that reflect performance reviews and any complaints brought against the Company or individual employees under applicable state and federal statutes. The Company should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file. Employment and personnel records should be retained for six years.
- (c) Press Releases/Public Filings. The Company should retain permanent copies of all press releases and publicly filed documents under the theory that the Company should have its own copy to test the accuracy of any document a member of the public can theoretically produce against that Company.
- (d) Legal Files Legal counsel should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of ten years.
- (e) Contracts, Leases, Licenses, Legal Documents. The Company should keep final copies for the same period of time it keeps other corporate files, generally three years. An exception to the three-year policy may be sales invoices, contracts, leases, licenses and other legal documentation. These documents should be kept for at least three years beyond the life of the agreement. The Company should keep all documents designated as containing trade secret information for at least the life of the trade secret.
- (f) Contracts. Final, execution copies of all contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least three years beyond the life of the agreement, and longer in the case of publicly file contracts.

Failure to comply with this Document Retention Policy may result in punitive action against the employee, including suspension or termination.

READ, UNDERSTOOD AND AGREED

Pauline J. Curry 9/30/11  
Office Manager/Director

Marci Leno 9/30/11

x Chelsea M.  
Employee's Signature

x 9/30/11  
Date