



Ellucian **Contractor** Travel and Business Expense Reimbursement Policy

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Scope

This policy governs all independent contractors, consultants, vendors, outsourced service providers and other approved vendors (all of which are collectively referred to as “contractors” throughout this document) who travel or incur business expenses on behalf of Ellucian.

Ellucian is committed to the highest standards of business ethics. All contractors doing business with Ellucian agree to deliver their services in a manner consistent with this commitment. Accordingly, each such contractor shall ensure that any member of its workforce (including employees, suppliers, agents, etc.) involved in the performance of services for or on behalf of Ellucian is aware of, trained on and complies with this policy. All contractors performing services for Ellucian must under the direction and control of their respective employers, comply with the following provisions and adhere to the highest standards of business ethics.

While every situation encountered by a contractor traveler may not be specifically addressed in this policy, Ellucian expects contractors to use good business judgment at all times. Ellucian reserves the right to amend or rescind, in whole or in part, this policy at any time and without notice as applicable by local in country requirements.

Responsibilities

Contractors who incur travel and business expenses on behalf of Ellucian are expected to:

- Conduct Ellucian’s business with integrity, in compliance with applicable laws, and in a manner that excludes consideration of personal advantage.
- Exercise prudent business judgment regarding expenses covered by this policy.
- Comply with this Ellucian Contractor Travel and Business Expense Reimbursement Policy.
- Submit complete required receipt documentation and explanations, while ensuring promptness and accuracy. Contractors are expected to retain original itemized receipts until expenses are approved and reimbursed.
- Understand that submitting fraudulent receipts or falsifying expenses will result in immediate termination of contracted services
- Understand that in the event the contractor’s agreement with Ellucian terminates, Ellucian is authorized to deduct any amounts owed to Ellucian or to a vendor from any pending or future expense reimbursements due to the contractor or contracting agency.

Managers of approved contractors, who approve travel and business expenses, are expected to:

- Ensure contractors who travel on Ellucian business understand the terms of the Ellucian Contractor Travel and Business Expense Reimbursement Policy, and are appropriately knowledgeable regarding its processes and procedures.
- Ensure that contractors submit required receipts in a timely fashion.
- Only approve submitted expenses that are justified, reasonable, accurate, and comply with this policy.
- Recognize that if the contractor is charging his/her expenses to a project, the responsible manager would be the manager responsible for the project to which the contractor is charging his/her expenses. Otherwise the approving manager would be the contractor’s direct supervisor.

Definitions

- **Non-Authorized Expenses:** Any expense that is not properly approved, documented, or necessary to the business of Ellucian will not be allowed. Some examples are included within the policy document, but such examples are not intended to encompass all instances.
- **Reasonable Expenses:** Those expenditures made using prudent business judgment based on the specific circumstances warranted. This excludes lavish or extravagant expenses such as high

priced hotels, expensive wines or meals, excessive tips, etc.

- **Allowable Expenses:** Properly approved and documented, reasonable expenses incurred by contractors for valid Ellucian business purposes.

Anti-Corruption

In accordance with Ellucian's Code of Conduct, Ellucian will allow expenses only to the extent such expenses are permitted under US and local law, including the Foreign Corrupt Practices Act and the U.K. Bribery Act. Ellucian policy prohibits all forms of bribery regardless of the situation or the recipient, including bribery of a government employee. No one acting on behalf of Ellucian or providing services for or on behalf of Ellucian, including Contractors, may offer, give or promise anything of value to a government employee for the purpose of, or as a reward for, improperly obtaining business, retaining business or for the purpose of, or reward for, improperly securing a financial or other advantage. No one acting on behalf of Ellucian or providing services for or on behalf of Ellucian may offer or give anything of value to anyone, knowing that all or part of the payment will be directly or indirectly offered, given or promised to a government official for a corrupt purpose. There is no exception for bribes of minimal value and even offering or promising a bribe violates Ellucian policy.

The U.K. Bribery Act specifically prohibits the making of "facilitating" payments, that is, small payments to facilitate routine governmental action. Contractors are prohibited from making any facilitating payments. In the event you are told that a facilitating payment is required, please contact the Legal Department. In the unlikely event that the requested payment is lawful, it must be properly recorded in the Company financial records as a facilitation payment.

No Contractor may make a gift – including a meal or entertainment – to a government employee without express prior written permission from a member of Ellucian's Legal Department. Questions about this policy should be directed to Ellucian's Legal Department at AskLegal@ellucian.com.

Expense Documentation Preparation

This policy addresses business expenses incurred by a contractor in connection with his/her conduct of business on behalf of Ellucian.

Expenses associated with contractors traveling on authorized Ellucian business should be submitted through the contracted agency. All authorized travel should be reviewed with the responsible Project Manager prior to booking to ensure attention to specific client parameters outside of these guidelines.

- Itemized receipts must be submitted for all applicable expenses. For minor expenses when receipts cannot be obtained, such as for tips or non-patrolled toll booths, an explanation must be provided.
- Expenses for spouses and/or guests traveling with a contractor are considered personal expenses and will not be reimbursed

Expense Documentation

Expenditures must be supported by adequate records, which clearly establish the expense as being:

1. Ordinary and necessary;
2. Reasonable in amount; and
3. Incurred for a valid business purpose, which must be documented with the submission of receipts.

Expense documentation must be completed and submitted within 14 days of return from a business trip or the incurring of an expense. Expense documentation shall detail the business purpose, explanations of the type of expense and the attendees, and receipts as required. Contractors are responsible for the integrity of their expense documentation.

The accounts payable department will audit expense documentation. The contractor and/or contracting agency will be notified of any deficiencies needing correction.

Receipt Guidelines

Itemized detail is required for all meals regardless of the amount to ensure compliance with client requirements for billable travel. Receipts are required for all incurred expenses in the amount of \$25 and over. Any expenditure requiring pre-approval such as client entertainment must have associated documentation included with the documentation submission. Detachable tear tab receipts for meal expenses are not considered valid receipts and will not be accepted nor will ticket stubs with written amounts.

Each receipt should clearly state the vendor, date, and expense amount incurred. The following is a quick reference guide for required documentation:

| Expense Item | Required Documentation |
|---------------------|---|
| Airfare | The e-ticket receipt, e-itinerary documenting ticket identification number, airfare cost, name, complete itinerary, date(s). |
| Hotel | E-itinerary and folio that itemizes room rate, tax, breakdown between meals & lodging. |
| Rental Car | E-itinerary & car rental agreement receipt that details mileage, daily rate, and any other charges. |
| Business Meals | Itemized receipt(s) for all business meals showing the restaurant, date, names, titles, and companies of those in attendance, and expense amount. |
| Other | For all other purchases include the charge card receipt with itemized bill or cash register tape. |

Expense Documentation Approvals

The approving manager is responsible for ensuring that the expenses charged to Ellucian are justified, reasonable, accurate, and in accordance with Ellucian policy.

Dividing an expense report into two or more parts to avoid an approval limit is prohibited and is a violation of this policy.

Meals and Entertainment

Contractors traveling on Ellucian business must provide documentation for actual and reasonable meal expenses they have incurred while traveling. Meal expenses may vary based on the location where the expense is incurred, but should be appropriate for the geographic area. The amounts indicated are consistent with industry norms.

Meal Expenses – While meal expenses may vary depending on locations visited, the total daily meals while traveling on Ellucian business should not exceed \$66 USD or equivalent per day including gratuity when traveling on business in the United States and Canada. Purchases of snacks and items from a hotel mini-bar are included in the daily meal allowance. It is recognized that costs will vary in higher cost cities.

The daily meal allowance guideline may exceed \$150 USD or equivalent when traveling to high cost cities in Europe and daily meal costs in excess of \$200 USD or equivalent may be applicable when traveling to cities in the Middle East, Africa, and Asia. In line with cultural norms for the specific locale, contractors should always err on the side of safety when determining the appropriateness of eating at a local restaurant or in the hotel where the employee is staying.

Meal costs incurred following the contractor's arrival at their home destination and/or airport are considered a personal expense of the contractor.

In regard to partial travel days, meal expenses should be proportionate to the travel day. Contractors will not be reimbursed for amounts which exceed the daily allowance.

Non-Authorized Expenses

The following are examples of some, but not all, non-authorized Ellucian expenses. Any item, which is tangible and/or could be brought home with the traveler, is not an authorized expense.

- Personal incidentals such as toothbrush, shampoo, clothing
- Fees for upgrades of air, hotel, or car rentals
- Meal costs associated with social celebrations of weddings, births, and Administrative Professionals Day
- Lost airline boarding passes
- In-flight cocktails, movies, pillows, blankets, headsets, etc.
- Grooming, nail, spa, hair salon, or shoe shine expenses
- Laundry and dry-cleaning, unless as noted under Incidentals
- Other non-business related hotel services including health club charges, concierge services, etc.
- Personal entertainment including in-room movies, video games, etc.
- Golfing, greens fees, or golf cart rentals
- ATM fees
- Country club dues
- Hotel "no show" charges unless cancelled at the last minute due to business reasons or inclement weather
- Contributions to charities and political causes
- Commuting expenses to contractor's ordinary place of business, including permanent geographic work or extended assignment location
- Baby-sitting, house-sitting, eldercare, pet-sitting, or dependent care expenses
- Car washes
- Chartered car services unless required to ensure safety based on cultural norms or travel advisories at the destination.
- Inappropriate entertainment of any nature as noted in the Code of Conduct
- Personal travel insurance
- Repairs to personal apparel or effects
- Repairs, insurance, or maintenance of personal vehicles
- Luggage and briefcases theft, loss or damage of personal luggage or property including personal automobiles
- Credit card fees, interest charges, or late payment fees
- Personal bar bills
- Airplane, or car rental phone expenses
- Duty and other custom charges on personal property
- Personal books, magazines, newspapers, CDs, or DVDs
- P.O. Boxes
- Souvenir items
- Unauthorized gifts, entertainment, or trips
- Unexplained or undocumented expenses
- Parking/traffic fines, moving or non-moving violations, towing, or court costs

- Excess baggage fees, except as required to meet a business need
- Fees associated with airline club memberships
- Personal side trips or vacations, when taken in conjunction with business trips; the authorized expense is limited to the transportation expense to or from the business destination and business-related expenses

Tipping

Tipping guidelines vary by country, location and situation, but here is a general guideline:

| | |
|----------------------------------|------------------------------|
| Dining (based on meal, not tax) | 15-18% |
| Taxis (based on service) | 10-15% |
| Baggage handling (airport/hotel) | \$1-2 USD/equivalent per bag |
| Hotel cleaning service | \$2 USD/equivalent per day |

Incidentals

Ellucian covers normal travel expenses, e.g., dry-cleaning on extended trips of five days or longer.

Booking Travel

The contractor should make travel arrangements as directed by the contracting agency.

Air Travel

Ellucian policy is for the contractor to book the lowest coach fare, balancing time constraints, alternative airports, and flights with numerous intermediate stops. Contractors should book the lowest fare based on the market.

Contractors must fly the air carrier that meets the criteria set for lowest fares, provider of choice, and offers a flight within a two hour window of the originally requested departure time. Contractors should select an itinerary within \$100/equivalent of the lowest available fare when traveling in-country and within \$300/equivalent when traveling cross border. Ellucian does not authorize upgrades to a higher class of travel or upgraded seating within coach class.

Reservations

Ellucian expects contractors to book travel reservations as early as possible to increase the probability of obtaining the lowest available airfare. Flights should be booked between 21 and 30 days in advance of travel to ensure receiving the lowest average cost per ticket.

Ticketing Restrictions

No "back-to-back," throwaway, or hidden city ticketing is permitted when traveling on Ellucian business as defined as follows:

- **Back-to-Back or Nested Tickets:** Refers to booking two round-trips with Saturday night stay-overs although the travel is intended to be mid-week; the traveler uses the legs of each round-trip and discards the unused ticket portions.
- **Throwaway tickets:** Refers to purchasing a round-trip ticket when the traveler only intends to use a portion of the booking, and discards the unused portion.
- **Hidden City:** Refers to purchasing a ticket from Point A to Point C and disembarking at the connection point B. The cost from Point A to Point B may be more costly than the cost of Point A to Point C with a connection at Point B.

Airport Parking

Contractors may park in the closest daily garage or long-term parking options at their home airport and/or at Ellucian locations. Charges incurred for valet or other premium or hourly parking are not allowable expenses.

If taking a taxi to and from the airport is less expensive than airport parking, contractors should choose that option instead of parking at the airport. As available by market, Uber, Lyft and Sidecar ride-sharing services are permitted as a taxi alternative.

Tolls

Tolls other than normal commuting costs must be listed in the appropriate category on the expense report. Auto toll passes used when renting a car when traveling on Ellucian business are permitted, if necessary and appropriate for the specific travel location, and the expense should be included in the car rental agreement.

Travel to/from the Airport

The most economical mode of transportation should be used when traveling to and from airports. The use of hotel shuttle vans, public transportation (as available), or personal auto is encouraged. Chartered black car services are not considered an allowable expense with the exception of specific in-country requirements regarding cultural norms and safety.

Denied Boarding Compensation

Airlines occasionally offer free tickets or cash vouchers to compensate travelers for delays and inconveniences due to overbooking and flight cancellations. Travelers who are involuntarily denied boarding should request re-accommodation on the next available flight and compensation in the form of a free travel voucher. It is the contractor's responsibility to notify the ticketing entity that a transportation voucher for future travel has been received.

Contractors should not volunteer for denied boarding compensation when traveling on Ellucian business unless the contractor is flying outside normal working hours and the delay will not result in any interruption or loss of business. Any incremental charges resulting from volunteering for denied boarding is not considered an allowable expense.

Use of Charter & Personal Aircraft

The use and/or piloting of personal aircraft for Ellucian business travel are never allowed.

Rail Service

The acceptable accommodation is reserved economy coach. The contractor is responsible for determining whether train travel is appropriate for their business need and whether this mode of transportation is more time and cost effective than air travel.

Car Rentals

Contractors should only rent cars when other means of transportation are unavailable, more costly, or impractical. The sharing of rental cars when other Ellucian travelers will be traveling to the same location should be the optimum choice.

- Economy or mid-size cars should be rented and requested when booking the rental. If a group of three or more travelers is traveling together, a full-size vehicle may be rented. **Insurance** – contractors should accept collision damage waiver & liability insurance offered at the counter
- Due to liability, contractors are not permitted to use campus vehicles unless required by Ellucian's contract with the client.
- Vehicles rented for business travel cannot be co-mingled for personal use. Business rentals must be returned to the car rental provider at the end of the business need.
- The rental of car phones, navigational aids, Satellite radios or specialty vehicles such as sports cars, convertibles, SUVs, Jeeps, and recreational vehicles are not allowable expenses.
- The use of motorcycles is not authorized for Ellucian business travel.
- Refueling charges imposed by the car rental provider are not a reimbursable expense.

Car Ferry/Ferry/Eurostar

Contractors may use ferries, car ferries, or the Eurostar (channel tunnel) if the total cost is less than air or rail fare to the same location.

Driver's License Requirements

The contractor must possess a current valid motor vehicle driver's license for the state/province/country in which he/she resides, and it must be in his/her possession at all times while operating any vehicle being used on Ellucian business.

Driving Distractions & Use of Cell Phones & Electronic Communications Equipment

Use of cell phones, handheld PCs or PDAs while driving either in a rental car or personal vehicle and/or operating equipment which is being used for Ellucian business travel is prohibited unless the employee (1) utilizes hands-free technology, or (2) pulls out of traffic and stops before initiating, answering, or reading such call, text, email or other communication, or (3) safely stops operation of the equipment before initiating or answering such call, text, email or other communication..

Personal Vehicles on Ellucian Business

Contractors may drive their personal automobiles on Ellucian business for their own convenience or when other transportation is unavailable or uneconomical. Where a personal vehicle is used in lieu of flying, the reimbursement is limited to the lesser of the applicable mileage allowance (IRS approved mileage rate x number of miles) or the applicable discount coach airfare and auto rental if it would have been required. Documentation should be submitted with the expense report submission showing calculations. If approved, the contractor will be reimbursed for the business trip miles at the applicable mileage rate. Gasoline costs are included in the mileage reimbursement and may not be submitted separately for reimbursement.

Ellucian assumes no responsibility for personal automobiles used for business. Contractors are responsible for knowing their personal automobile insurance coverage when using their personal vehicle for Ellucian business. A contractor who uses his/her vehicle on Ellucian business is expected to provide at least the minimum insurance coverage as required by the state/province/country where the car is registered, a valid inspection certificate as required by country/province/state/county/local ordinance, and vehicle registration in compliance with country/state/county/local requirements.

Accident Instructions in a vehicle rented on Ellucian business

In case of a motor vehicle accident call local law enforcement. If there are injured parties request medical assistance.

Report the claim directly to the insurance provider as noted in the insurance paperwork provided by the rental car provider.

Lodging

Lodging Standards

Ellucian's preferred providers include moderately priced business oriented properties such as Hampton Inn, Hilton Garden Inn, and Courtyard by Marriott. A single room with a private bath is the Ellucian standard. Room and/or executive/concierge floor upgrades are not an allowable expense.

Contractors should:

- Know they are responsible for cancelling hotel room(s) they will not need
- Know "no show" charges will not be reimbursed unless due to changing business requirements and/or inclement weather.
- Record the cancellation number in case of billing disputes.

Telephone Calls

Travelers should use their mobile phones instead of the hotel room phone.

Cross-Border Travel

Cross-border travel is considered travel outside the contractor's home country.

Visas/Passports

It is the contractor's responsibility to ensure that they have any necessary and appropriate documentation for travel outside of their home country.

Compliance

Failure to comply with this policy and related guidelines may result in termination of contracted services.

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