



# Anthology Travel & Expense Policy

2022

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## Objective

The company's policy strives for the appropriate balance between the following goals:

- Ensure our policies and tools support employees in performing at their best in the office and while travelling on business.
- Manage our resources effectively to enable successful growth of the company.
- Ensure our policies are appropriate relative to the sector in which we work and maintain the trust of our customers.

Thank you for your commitment to further the Anthology mission through your thoughtful and ethical use of company resources when travelling or incurring expenses in support of company business.

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## Overview

**This policy applies to all employees globally, excluding employees based in India and Blackboard Student Services contact center employees.**

The purpose of this policy is to set expectations and define responsibility for travel and expenses at Anthology.

The company will reimburse employees for certain expenses incurred in the pursuit of the Company's business and mission. Our goal is to provide employees with adequate transportation, lodging, meals, and other services that are a part of doing business. Expenses must be reasonable, necessary, and have a valid business purpose, and be uniformly and properly accounted for and authorized. Anthology always expects employees to exercise good judgment with respect to all travel and expenses.

The company assumes no obligation to reimburse travelers for expenses that do not comply with this policy. Those non-reimbursable expenses will be the obligation of the traveler. Additionally, travelers who misuse or circumvent the principles of the policy will be subject to delay or withholding of reimbursement and/or disciplinary action up to and including termination of employment.

This policy is designed to address most expenses that a traveler may incur. On rare occasions, a traveler may incur an extraordinary expense for which they believe reimbursement is appropriate. In such cases, travelers may request an exception through their direct manager. Exception requests should be infrequent and require prior written approval. This policy supplements employee handbooks/manuals and other Anthology policies including but not limited to the Code of Business Conduct and Ethics, Gift and Entertainment Policy, and International Anti-Corruption Policy.

Note that throughout this document amounts are noted in U.S. dollars (except in Appendix B). Outside the U.S. the equivalent amount in local currency would apply.

## **Policy Effective Date & Review**

The effective date of this policy is July 1, 2022. This version of the policy supersedes and replaces all prior PMA and PMB employee travel and expense policies. This policy will be reviewed and updated as appropriate. The Company reserves the right to revise this policy at any time, without prior notice.

## **Roles and Responsibilities**

There are two primary roles involved in any request for reimbursement: (1) individual employee requesting reimbursement and preparing the expense report, and (2) the authorized approver of the reimbursement and issuance of payment. The roles and responsibilities of each are described below.

### **Employee**

The employee is responsible for:

- Being aware of and adhering to terms of this policy and other company policies at all times.
- Booking travel and submitting expenses via Concur (except as set forth below for employees in the Czech Republic). If an individual other than the employee prepares travel or expenses, the employee is responsible for providing the preparer with the appropriate information to complete the expense report and review the completed report for accuracy.
- Submitting expense reports on a timely basis, preferably within 14 business days of incurring the expense or from the end of their travel period away from the office. Expenses with transaction dates greater than ninety (90) days will generally be denied payment.
- Obtaining all proper documentation for each expense \$20 and greater.
- Directing questions concerning this policy to the Travel & Expense team.

Although employees based in the Czech Republic are not required to use Concur, this policy otherwise applies to them. Employees in the Czech Republic should contact [brno.office@blackboard.com](mailto:brno.office@blackboard.com) for assistance.

### **Expense Approver**

All travel and/or expense costs must be approved by an individual with appropriate authority for their department. Expense approvers are responsible for knowing this policy and ensuring their team is aware of Company policy and procedures. The approval certifies the following:

- Compliance with this policy
- Completeness and accuracy of the documentation and receipts

Expense approvers are responsible for reviewing, correcting, approving, and/or rejecting submitted reports within three days of receipt. Under no circumstances may an individual approve their own report or that of a person to whom they report.

### **Actions Required Upon Termination of Employment**

Prior to leaving Anthology, employees must submit expense reports for outstanding expenses. Subject to applicable law, Anthology reserves the right to deduct outstanding Corporate Card balances from employee's pay or other amounts due to the employee. By accepting a Corporate Card, the employee agrees to such deductions.

If an employee is leaving the company, the employee's manager or a member of the HR Department should confirm that the employee has returned or destroyed the Corporate Card. Prior to the employee's last day of employment, the employee's manager is responsible for instructing the departing employee to reconcile their Corporate Card account, submit all expense claims and documentation, and resolve any outstanding balances.

### **Travel and Expense Department**

The Travel and Expense team is in the Treasury Department. Among other tasks, the team assists with issuing or cancelling company credit cards, credit limit adjustments, processing expense reports and ensuring payment is issued to the employee. The team also conducts travel and expense audits and assists employees with policy and procedure questions. Treasury is responsible for revision and publication of this policy.

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## **Company Credit Card Expectations and Procedures**

### **Issuance and Cardholder Responsibility**

Employees who are expected to travel are required to use the American Express Corporate Card for all business-related travel expenses (MasterCard for UK and Netherlands employees). The Corporate Card program is designed as a convenient and secure expense tool for our business travelers. If an employee travels or incurs company expenses as a normal part of business, the manager may request a Corporate Card be issued to the employee. Personal credit cards should not be used in lieu of the Corporate Card for any appropriate T & E-related business expenses.

Pursuant to the Card Issuer's Cardholder Agreement and this policy, the employee agrees to indemnify and hold the Company harmless for any charges, damages, or other claims or suits of any nature arising out of or resulting from the employee's failure to pay for any charges placed on a Corporate Card in violation of this policy.

Corporate Card usage may be audited and/or rescinded at any time. Personal use of the Corporate Card is strictly prohibited except as set forth below. Inappropriate use of the company Corporate

Card or delinquencies could result in the inactivation of the employee's Corporate Card or other disciplinary action up to and including termination of employment.

Employees are responsible for always keeping their Corporate Card accounts current and in good standing. The Corporate Card should not be attached to recurring charges or placed "on file" with a vendor. Employees are required to submit expense reports via the Concur Expense system on a timely basis to clear outstanding balances and to prevent any account from aging past the due date.

## Corporate Card Limits

Each Corporate Card is assigned a credit limit based on the employee's role and the type and amount of business travel or business purchasing expected for that role. Initial limits may also be set by American Express based on a soft check of the applicant's credit history.

## Cash Advances

Cash advances (whether via ATM, bank, hotel, etc.) are not available on a Corporate Card.

## Personal Expenses on Corporate Cards

Corporate Cards should be used for business purposes only. An employee may not use a Corporate Card for personal expenses, except in the limited situations listed below when the personal amount is embedded within a valid business expense. The employee is responsible for paying any personal amount.

### The limited situations are:

- Airport parking (i.e., extending business trip for personal reasons)
- Business meals (i.e., personal guest attendee)
- Rental cars (i.e., extending business trip for personal reasons, which may only be done with prior approval of the Travel & Expense team)

Any other personal expense charged to a Corporate Card is a violation of this policy, which will result in appropriate action including but not limited to suspension of the Corporate Card or disciplinary action up to and including termination of employment.

Payment of any personal expense, interest, or late fee associated with an unpaid personal expense incurred on a Corporate Card is the employee's responsibility. Employees must remit the amount due for any personal expenses directly to the card issuer no later than **30 days** from the billing cycle date in which the transaction was incurred.

## Delinquent Credit Cards

A Corporate Card will be considered delinquent if any balance remains unpaid on the card for 30 days or more from the billing cycle date. Any interest or late fees that are assessed on the unpaid

balance by the card issuer are the employee's responsibility. Card Issuer will suspend all Corporate Cards with balances due in excess of 60 days from the billing cycle date. Once the entire balance has been paid in full to the card issuer, the employee and the employee's manager must contact the Travel & Expense department to discuss reinstatement of the Corporate Card.

## Membership Rewards Program

AMEX cardholders can participate in the Membership Rewards program, which is a reimbursed expense. To learn more about the program, go to [www.AmericanExpress.com](http://www.AmericanExpress.com). For further information on the American Express Corporate Card program, please refer to the Appendix A.

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## Expense Report Processing

Employees should comply with the following when documenting any reimbursement of travel and related business expenses:

- Scanned images of original receipts are required for all travel, entertainment, and business expenses of \$20 or more, except those employees in Mexico and Colombia who must attach all receipts regardless of amount.
- Acceptable forms of receipt submittal include faxed images, e-receipts, smart receipts, and Concur mobile imaging of receipts.
- Employees should keep copies of their receipts for 90 days.
- An employee must attach a Missing Receipt Declaration (MRD) to a Concur expense line item that does not have a receipt. The MRD can be digitally signed in the Concur expense report. Three occurrences of repeated failure to provide appropriate receipts may result in denial of payment.

## Receipts

A receipt may take many forms (e.g., e-receipt, airline ticket, rental agreement, cash register receipt, web receipt or confirmation). A receipt must identify:

- Purchaser name, if applicable
- Last 4 digits of the credit card number
- Traveler name, if applicable
- Date and time of purchase
- Vendor name
- The total amount

- Itemized list and unit price of the purchased items

## Hotel Receipts

The traveler must submit an itemized hotel bill or invoice that includes:

- Traveler name
- The dates of stay
- The detailed charges
- The total amount of the lodging
- Proof of payment (zero balance)

## Transportation Tickets

Passenger copies of transportation tickets are required, including participating vendors' e-receipts, which are downloaded into Concur accounts. The travel itinerary and booking locator information will match the Corporate Card charge.

## Expense Reimbursement

Employees receiving reimbursement for travel and business-related expenses will be reimbursed via the same method as they are paid (e.g., direct deposit).

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## Allowable Expenses

In addition to standard transportation, dining and lodging expenses, these expenses will be reimbursed provided they are reasonable and have an authorized business purpose.

## Reimbursed Expenses

- Laundry, dry-cleaning for trips in excess of 5 consecutive days, up to maximum allowance of \$20/week Note: If the employee is away from home due to a preference to travel to another city on the weekend and not returning to their home location, then the employee's laundry, valet and dry-cleaning expenses are not reimbursable.
- Road Warrior (namely, an employee who regularly travels 2.5 weeks or more per month) — a one-time luggage expense of up to \$200 in a calendar year for wear and tear on luggage
- If being used for work purposes (not entertainment), internet connectivity in hotels, airplanes, and other public places. Employees should be mindful of security issues surrounding wireless connectivity. Please contact the IT Help Desk for more information. PMB U.S.-based employees can reach the IT Help Desk at 1-888-719-6122. PMB Employees outside the U.S can contact the



IT Help Desk using the phone numbers located [here](#). PMA Employees can contact: U.S. 888-365-0050, outside U.S. 1-561-923-2637

- Personal car mileage at rates published in Appendix B
- Professional memberships when appropriate for the performance of the employee's position
- Seating and priority boarding up to \$50 each, for outbound and inbound flights, inclusive of layovers
- Currency conversion costs
- Visa and passport renewal rush fees if business related and required
- Immunization and/or Covid testing (prior or during travel) costs if required for international travel (to extent not covered by insurance)
- Upgraded class of service within the purchased cabin for flights with a continuous in-flight time exceeding eight (8) hours, e.g., Economy to Premium Economy. Continuous in-flight time is defined as the time the aircraft is in the air without landing. Layovers and time spent getting to/from the airport should not be considered a factor

## **Non-Reimbursed Expenses**

The following expenses will not be reimbursed:

- Personal expenses of a nature that would be incurred by an employee regardless of their work responsibilities
- Expenses incurred when any business trip is extended for personal reasons; no items or amount of the personal portion of the trip may be expensed
- Expenditure prohibited by law or company policy

**Non-reimbursable expenses are listed below.** This list is not all-inclusive and there may be additional or similar non-reimbursable expenses which are not listed.

- Airline membership fees/dues
- Air, rail, car rental phone usage
- Annual dues on a personal credit card
- Personal grooming
- Car washes
- Club memberships or fees
- Coat check
- Corporate Card late and delinquency fees
- Personal credit card fees
- Political or charitable contributions
- Damages or “refreshing” charges to a hotel room
- Dues and membership fees for any social clubs, including online
- Expenses submitted more than 90 days after they were incurred
- Expense resulting from obtaining airline miles for personal use
- Global Positioning Systems (GPS), either rental or purchase
- New or renewal passport fees
- Overhead bin space
- Airline club/lounge access
- Hotel room upgrades
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- Fees incurred for failing to cancel reservations on time
- Class of service upgrades (coach to business or first)
- Hotel room movies
- Hotel no show/cancellation charges (except for no-shows resulting from same-day travel delays caused by an airline)
- In-room dining charges when expensing per diems
- Local call charges (calls made from hotel in-room phone)
- Lost cash
- Lost tickets
- Loyalty or rewards programs membership fees (except for Amex membership fees)
- Personal luggage, briefcases other than approved Road Warrior luggage
- Expenses for family, child, pet, and home
- Home and property care while on a trip
- Hands-free devices, e.g., Bluetooth headsets, not obtained through IT support services
- Personal gifts
- Software licenses
- Office furniture
- Mobile devices
- Personal entertainment
- Computers (laptops, tablets, monitors, etc.) unless instructed by IT
- Fees charged for additional mileage accrual
- Pillows and blankets
- Personal internet use
- Rental car washes
- Routine car maintenance
- Shoeshine, shoe repair
- Snacks or other meals beyond breakfast, lunch, or dinner
- Snow removal, lawn care
- Souvenirs, personal gifts
- Spa services
- Supplementary personal life insurance or other insurance premiums
- Tobacco products
- Traffic and parking fines
- Purchase of hardware, software and telecom (smart phone) equipment outside of policy
- Vacation or personal days expenses while on a business trip for employee or travel companion
- Valet airport parking
- Priority/preferred seats & boarding fees exceeding the \$50 limit for each one-way trip.

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## General Travel Information

Official travel for the company is considered as travel between one's home or the workplace to another destination and returning either to the workplace or one's home. Commuting between one's home and the workplace is considered a standard commute and will not be reimbursed. For local travel, deducting the round-trip daily commute must be included when submitting mileage from one's home to client location/another destination.

For company business-related travel, travelers are personally responsible for arranging and confirming their travel using Concur. **Travelers are required to purchase the lowest-priced tickets available in Coach/Economy Class only.** Please refer to the section Upgrades and Approvals for Air Travel for additional guidelines.

Prior to booking any travel, the traveler must receive approval from their manager. In the circumstances below written (including via email) manager approval is required:

- Domestic flights with airfare exceeding \$700 RT
- All international travel including flights exceeding \$1,500 RT
- All travel outside of an employee's home country must be approved **in advance** and in writing by the employee's supervisor
- Airfares exceeding \$3,000 RT require the approval of the division CLT
- Airfares exceeding \$5,000 RT require the approval of the CFO

## Travel Alternatives

The decision to travel must be based solely on business needs and should be scheduled only when a more economical alternative is not feasible to achieve the intended purpose (e.g., video conferencing). Every potential traveler should evaluate whether the business objective can best be accomplished through the use of an e-meeting, teleconference, or videoconference.

## Concur Travel and Expense

All business travel arrangements and expense submission should be done in Concur. User accounts will be activated by the travel team. Training and usage documents can be found on the Concur home page of the user's account.

## Traveler Profiles

Employees are responsible for building their traveler profiles in Concur immediately upon having access and for keeping the information (contact, method of payment, card expiration date, TSA required data, etc.) current.

## Designated Travel Agency

The travel agency that provides travel fulfillment of all bookings in Concur can be found on the user's Concur home page, on the travel booking locator, and in the Concur Trip Library. The travel agency fees associated with these bookings will download as a separate expense in Concur and be invoiced to the client when billable.

## Travel Agencies

### PMA

Travel Agency – BCD [Contact Information](#)

- North America based travelers: [na.nesregion@travelctm.com](mailto:na.nesregion@travelctm.com)
- UK based Teams: International Agency: [EU.TravelTeam@travelctm.com](mailto:EU.TravelTeam@travelctm.com)

### PMB

Travel Agency – BCD [Contact Information](#)

- Czech Republic Travel Arrangements: [brno.office@blackboard.com](mailto:brno.office@blackboard.com)

For teams requiring local arrangements in India/India travel arrangements:  
[traveldeskt@anthology.com](mailto:traveldeskt@anthology.com)

## Passports and Travel Documents

Employees traveling outside of their home country should check that their passport is current with at least six months validity and three blank visa pages. Expenses associated with obtaining a visa or rush fees for a passport are reimbursable. The cost of passport issuance or renewal is not reimbursed. Refer to <https://travel.state.gov/content/travel/en/passports.html> for U.S. passport and visa guidelines and timeframes. India employees should reach out to [traveldeskt@anthology.com](mailto:traveldeskt@anthology.com) for visa assistance.

## Trusted Traveler Program Memberships

Anthology will reimburse employees up to \$100 annually for roles with 25%+ travel. Trusted traveler program memberships include TSA Pre-Check, Clear, Nexus, or Global Entry, etc.

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## Air Transportation

### Reservations

All business travel arrangements should be made in Concur or, when there are special circumstances, directly with the travel agency. Simple roundtrip itineraries must be made online. More complicated, multi-destination trips or trips outside of the home country may be made directly with the travel agency. Airline tickets may not be booked directly with the carrier, on any consumer sites, nor via any non-preferred travel agencies without prior written approval from the Anthology Travel team.

### Advance Planning

To optimize cost savings for the company, employees should make travel arrangements 14 or more days in advance of domestic travel and 30 or more days in advance of international travel whenever possible. Significant discounts are also available on airfares to which strict penalties apply if the trip is canceled (e.g., non-refundable fares). Because of the potential cost savings, the use of non-refundable tickets is encouraged when an employee is certain that the trip will take place as planned.

As set forth above, flights more than \$700 domestic/\$1,500 international require the approval of the employee's manager prior to booking the reservation. Significant discounts are also available on airfares to which strict penalties apply if the trip is canceled (e.g., non-refundable fares). Because of the potential cost savings, the use of non-refundable tickets is encouraged when an employee is certain that the trip will take place as planned.

**Note:** Concur automatically routes reservations for flights more than the above stated limits to managers for approval prior to an employee being able to complete their booking. Reservations made directly with the travel agency should be expensed with manager approval attached.

### Domestic Flights

Coach Class: Non-refundable coach class is policy booking class for all domestic flights.

Domestic flights should not exceed \$700. Exceptions to purchasing the lowest-priced fare may be allowed if it would:

- Require circuitous routing, e.g., one or more stops resulting in less than \$100 savings
- Require travel during unreasonable hours
- Excessively prolonged travel, e.g., 2-hour extension each way
- Greatly increase the duration of the flight

- Result in other increased costs, such as hotel and meals, that would offset savings on transportation

## Cancellation Policy

If an employee needs to cancel a trip, they should do so in Concur. Airline tickets are often non-refundable, and canceled reservations will result in an airfare credit being issued that can be used by the ticketed passenger subject to individual airline requirements. The travel confirmation will indicate the fare type and rules. If flight disruptions occur during a trip, please work with the travel agency directly to assist with rebooking.

## Preferred Airlines and Ancillary Fees

For travel originating in the U.S., the Company has negotiated contracts with United Airlines, American Airlines, Delta, and Southwest Airlines as its preferred air carriers. The preferred airlines offer discounted airfares based on the fare type and should be the selected carriers when available **and** cost effective. Flight options for the preferred air carriers are highlighted in Concur.

If the ticket cost with the employee's preferred carrier exceeds the ticket cost of an alternate carrier by more than \$100, then the alternate carrier ticket will be purchased.

Ancillary fees including preferred seating, early boarding, and priority check-in may be expensed up to \$50 outbound/return and, when applicable, expensed to a client. The combined purchased airfare and seat choice cannot exceed the fare limits as previously outlined. In Concur, the expense type "Seat Fee" is to identify seat choice fees, including early boarding and priority check-in.

## Denied Boarding Compensation and Overnight Delays

On occasion, airlines offer free tickets or cash allowance to compensate travelers for delays and inconveniences due to overbooking, flight cancellation, and mechanical issues. If an airline delays or cancels a flight resulting in an overnight stay, employees should make every attempt to secure complimentary lodging from the airline, including a meal allowance.

### **Travelers may volunteer for denied boarding compensation only if:**

- Delays in the trip will not increase the cost of the trip
- Delaying the trip does not result in interruption or loss of business or diminish personal productivity

Employees may keep the free travel vouchers for personal use.

## Upgrades and Approvals for Air Travel

Employees are required to fly in coach/economy class. Business or first class is not permitted for domestic travel. Upgrades for air travel to destinations outside of the home country must be approved by the employee's manager prior to making travel arrangements and will only be

considered when the scheduled continuous in-flight time exceeds eight (8) hours. Continuous in-flight time is defined as the time the aircraft is in the air without landing. Layovers and time spent getting to/from the airport should not be considered a factor in meeting the eight (8) hour requirement.

Travelers are not permitted to book air travel at a higher fare to benefit their personal frequent flier program. Fare approvals are required: CLT approval for fares over \$3,000 and CFO approval for over \$5,000 for round trip tickets.

## **Unused Airline Tickets**

Canceled or unused airline tickets have a cash value and are tracked in Concur. The following guidelines are applied when air travel tickets are canceled or unused:

- If air travel tickets must be canceled due to a client scheduling change, then the fare and future airfare change fee are expensed to the client. Comments explaining the change should be added to the expense line item.
- If air travel tickets must be canceled as the result of an employee's personal needs, then the Department Manager will evaluate to determine if the ticket fee will be charged to the employee. If the ticket fee is not charged to the employee, then it will be expensed to "Canceled Airfare" and billed to their home department. If the ticket fee is not allowable, then the employee is responsible for paying that expense directly to the Corporate Card company.

## **Airline Change Fees**

**The following guidelines apply when expensing change fees:**

- If air travel tickets must be changed as a result of the company's internal scheduling changes, then the change fee is expensed to "Airline Change Fee" and is considered non-billable.
- If air travel tickets must be changed as a result of a client's change to the schedule, the change fee is expensed to "Airline Change Fee" and invoiced to the client.
- If air travel tickets must be changed as the result of an employee's personal needs, then the Department Manager and Executive Management will evaluate to determine if the change fee will be charged to the employee. If the change fee is not charged to the employee, then it will be expensed to "Airline Change Fee" and is considered non-billable. If the change fee is determined not to be an allowable expense, then the employee is responsible for the fee.

## **Lost or Excess Baggage**

The ultimate responsibility for retrieving or compensating for lost baggage lies with the airlines. The Company will reimburse necessities up to \$100 (or local currency equivalent) for lost baggage missing more than six hours while traveling on business. Employees must provide a lost bag report to support requests for reimbursement. Any additional expenses exceeding \$100 must be approved by the employee's manager and/or the Anthology Travel team. Airlines will typically

reimburse for items needed immediately and should be the primary method of reimbursement sought.

**Measures that can be taken to minimize baggage losses include:**

- Always carry valuables (prescriptions, jewelry, laptops, etc.) onboard the aircraft
- Always carry important and/or confidential documents onboard the aircraft
- Clearly tag luggage with name, address, and phone number
- Retain baggage claim receipts for checked luggage

**Follow these procedures if bags are lost:**

- Obtain a lost luggage report form from an airline representative in the baggage claim area
- Itemize the contents of bag(s), including receipts wherever possible
- Include a copy of airline ticket/receipt and baggage claim stubs
- Keep a copy of the report, airline ticket/receipt, and claim stubs

**Employees will be reimbursed for excess baggage charges, with prior approval by the manager, only in the following circumstances:**

- When traveling with heavy or bulky materials or equipment necessary for business
- The excess baggage consists of Company records or property
- When traveling for more than five days

## **Airport Parking**

The traveler may park at the airport or use public transportation. The public transportation should not exceed long-term parking charges. When comparing taxi service, the lower cost alternatives should be chosen. Valet parking at airports is not reimbursed.

## **Travel Loyalty Programs and Airport Club Memberships**

Travel awards from airlines, hotels, car rental agencies, and other providers earned while on company business may be retained by the traveler. Travelers will not be reimbursed for use of travel awards, spent miles, or memberships in travel clubs or special programs to obtain travel awards. Neither the Company nor the travel agency will intervene or resolve any frequent flyer program concerns, issues, etc. Membership costs are not reimbursed. Participation in a frequent flyer program must not influence flight selection that would result in incremental cost to the Company beyond the lowest available airfare. Airline club memberships costs and hourly airport club use are not reimbursed.



## **Lost Documents**

Travelers are responsible for ensuring the security of all travel-related documents, including passport, tickets, Corporate Card, etc.

## **Private and Charter Aircraft**

Business travel is restricted to commercial aircraft. Use of charter aircraft while on company business is prohibited. The use of private aircraft for business purposes is not permissible under any circumstances, unless directed by the CEO.

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## **Ground Transportation**

The most cost-effective, safe, and efficient ground transportation is to be used (e.g., taxi, ride share, hotel courtesy van, bus).

## **Automobile Use**

Only employees with exemplary driving records may operate vehicles on Company business. Employees with poor motor vehicle records ("MVR"), suspended or restricted driving privileges, or impaired driving abilities are not permitted to operate any vehicle (including rental cars) on behalf of the Company at any time. Poor MVR shall mean more than two moving violations within the last three years, any "major" violation conviction such as reckless driving or Driving Under the Influence (DUI/DWI) within the past five years, or more than one at fault accident within the past three years. Any employee found in violation of this policy shall be subject to immediate disciplinary action up to and including termination of employment. The Company reserves the right to review an employee's motor vehicle record at any time prior to or during employment and may take appropriate disciplinary action, up to and including termination of employment, based on the result of such review.

## **Rental Car**

Rental cars are booked in Concur using company preferred vendors National (airport locations) or Enterprise (locations other than airport).

The use of a rental vehicle should be justified based on a business need and when it is less expensive than the local ground transportation alternative, taking safety and travel time into consideration. Personal convenience is not an acceptable justification.

The company program with National and Enterprise provides the traveler with special recognition, service, and speed whether renting at an airport or in the local market. National provides speed and consistency for frequent airport travelers through the Emerald Club. Enterprise provides the custom attention and service needed for local market rentals while also serving the needs of

airport travelers. Travelers are encouraged to join the Emerald Club. Please see Appendix B for additional details. The Contract IDs for Business rentals with Enterprise and National are XZ41442 (PMA) and XZ16022 (PMB).

To maximize cost savings, employees should refuel rental cars prior to returning.

## Vehicle Size Restrictions

Employees travelling alone or with up to two company employees will be reimbursed for **midsize/intermediate** or **smaller** cars only, unless there are extenuating circumstances (e.g., baggage necessary for a lengthy stay, medical, physical disability).

### **A full-size vehicle is permitted when the traveler is:**

- Transporting bulky equipment
- More than three company employees are traveling together in a single vehicle. Approval prior to booking is required for any vehicle larger than full size
- Transporting clients

Travelers may accept car rental upgrades only if there is no additional cost to the Company.

Under no circumstances may an employee rent a luxury or “extreme” vehicle (e.g., Hummer, Range Rover, Jaguar) in connection with any business travel without prior written approval from the CFO.

If renting with National/Enterprise, all optional insurance premiums, including Collision Damage Waiver/Loss Damage Waiver (CDW/LDW), should be declined as these fees are included in the Company’s contracted rate with National/Enterprise and will not be reimbursed. If an employee is renting with a vendor other than National or Enterprise, the employee **must** purchase the optional CDW/LDW insurance.

## Rental Car Guidelines

- Mobile phones are not to be used while driving in accordance with company policy
- Rental car upgrades are allowed if there is no additional cost to the company
- Rental car accessories such as GPS systems are non-reimbursable
- Rental cars should be returned to the original rental location when possible
- Parking and toll charges are reimbursable

Traffic and parking violations while operating a rental or personal vehicle on company business/time will not be reimbursed and are the responsibility of the driver. Employees should not leave personal or Company property in rental vehicles. Included insurance coverages do not cover personal property in the event of theft or damage in the event of an accident.

## Professional Services and Car Rental

Prior to booking a rental car, confirm with the project manager the vehicle size and number required. A rental car may be shared when travel involves a team of consultants. The project manager will identify these requirements and assign team members to reserve rental cars.

## Rental Car Accidents

In the event of an incident involving a National or Enterprise rental vehicle while traveling on company business, employees must take the following steps to ensure appropriate processing of any claims:

- Contact local authorities as required and National-Enterprise's Roadside Assistance program to report the accident. This information can be found on the rental agreement. Roadside Assistance will start the claim process.
- Do not give personal insurance information to the other party. The contracted rates are inclusive of full coverage.

If the other party requires documentation, please provide the rental agreement number and the certificate of insurance for the rental, which is generally located in the visor above the glove box.

As soon as possible, e-mail copies of the damage report, police report, and Concur booking itinerary to the Anthology Travel Team. Be sure to retain a copy of the accident report.

The traveler should expect to receive follow up requests for information from both the rental car agency as well as Accounting and HR.

## Rail/Bus/Ferry Travel

Standard class of rail, bus, and ferry tickets is preferred. Business class and high speed, express business class rail, e.g., Acela, may be reserved for rail travel when more flexibility is required. Rail can be used if it is no more expensive than air travel and does not result in excessive travel times.

EMEA-based employees are not required to make rail reservations via Concur as rail content is not always available. Employees traveling in the UK have access to regional rail carriers on the online booking tool. As such, all rail tickets should be booked on the tool or directly with the travel agency.

## Sedan Service/Scheduled Ride

Employees are not permitted to use scheduled Sedan ("Black Car") or limo services. Employees may use services such as Uber, UberX, Lyft, etc. if the cost is not significantly higher than the normal taxicab or airport shuttle fare and personal safety is not jeopardized.

## Personal Vehicle for Business Related Travel

Personal vehicles should not be used for any business-related travel (local or long distance), exceeding 300 miles/480 km. provided there's a cost savings over rental car. This would include airport mileage. On the rare occasion that an exception is required, manager pre-approval must be provided.

Employees using their personal cars for Company business must use the Concur Mileage Calculator when expensing mileage. The purpose of mileage reimbursement is to recover the approximate cost of gasoline as well as the wear and tear on the employee's personal vehicle. The expense related to gasoline consumed by personal vehicles is the responsibility of the employee.

The company uses the current government standard rate which can be found at [www.gsa.gov](http://www.gsa.gov).

If an employee is using their personal vehicle for Company business, in addition to the previously stipulated driving record and valid driver's license criteria, the employee must have adequate liability insurance on their personal vehicle with the minimum coverage limits outlined below (or local currency equivalent):

- Property damage \$50,000 per occurrence
- Liability/Bodily Injury \$100,000 per person/\$300,000 per occurrence
- A personal car in good working order that meets road safety standards

The Company reserves the right to request proof of insurance. The Company may provide excess insurance protection for the liability it assumes by permitting employees to use their own vehicles on Company business. The Company's corporate automobile insurance policies, however, mandate that the employee's insurance coverage is primary and must be accessed first in the event of an accident or similar occurrence. The Company does not provide any automobile insurance coverage (liability or physical damage) for the employee or the employee's vehicle. The Company does not reimburse for deductible amounts paid by the employee for claims.

Personal car usage reimbursement limits in local currency are outlined in Appendix B.

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## Lodging

The company will reimburse a traveler for the cost of their room and any applicable taxes and fees when traveling on approved company business. Airbnb is not allowed or reimbursed unless management has approved in writing (including via email).

## Contracted Hotels

Every effort should be made to book hotel reservations via the online booking tool in Concur. In cities where the company has contracted with a specific hotel, reservations will be made with that hotel. It will be identified in Concur as "Most Preferred" or "Preferred."

In cities where there is more than one contracted hotel, the employee may choose among contracted hotels, selecting the least expensive rate.

When travel schedules require early hotel check-in and additional hotel charges are incurred, the additional charges are considered reimbursable.

## **Hotel Selection, Guidelines, and Upgrades**

Treasury monitors and updates the maximum nightly lodging rates periodically. In cities where the company does not have a contracted hotel, or all contracted hotels are sold out, the lodging selected must not exceed the maximum allowable rate of \$300 per night. Any costs exceeding this night rate require advance Department Manager approval. Prior to check-in, travelers should verify room rates and seek special promotional rates. It is the traveler's responsibility to review and dispute any discrepancies on the hotel bill.

Travelers must reserve Standard rooms. Room upgrades to suites or executive floor rooms may be accepted only if the upgrade is at no additional cost to the company. Employees may not book hotel rates that require deposits or are non-refundable, with the exception of conference/trade show hotels where this may be required.

For billable travel, hotel, transportation costs, and per diems incurred during weekend stays within a geographic location will be considered for reimbursement. Refer to the guidelines in section Extended Travel Per Diem Allowance.

## **Conference Rates**

Concur Travel does not have access to the reserved block of rooms for a conference. Employees should book their own conference hotel room as part of the conference registration process. If the conference rate is higher than the maximum lodging rate listed in the section Hotel Selection, Guidelines and Upgrades, the employee must submit evidence of the conference rate with their advance deposit folio for reimbursement.

## **Assured Reservations, Room Guarantee, and Early Check-out Procedures**

All rooms should be guaranteed for late arrival with the traveler's Corporate Card. If a hotel has overbooked, the hotel must provide alternate accommodation without an increase in cost. If the traveler encounters this situation and a satisfactory alternative is not provided, the traveler may book a comparable priced alternative and contact their manager. If the traveler is required to check out earlier than stated on the reservation, any fees charged by the hotel are reimbursable. Consult with the hotel to determine if a check-out fee is applicable.

## **Extended Stay/Temporary Assignment**

Travelers staying longer than a week should inquire about weekly/long-term discounts. If on assignment at the Boca Raton corporate offices, long term rates are available at the Residence Inn Boca Raton.

## **Lodging in a Private Residence in Lieu of Hotel**

Travelers staying in a private residence while on business are entitled to a \$50 per night allowance with a maximum of three nights (total \$150, or equivalent) in order to provide a gift to the host, e.g., restaurant dinner, gift basket. The traveler is required to obtain approval from their manager prior to arranging private accommodation in lieu of a hotel. Gift cards are not acceptable as these represent cash.

## **Hotel Cancellation Procedures**

If an employee needs to cancel a hotel reservation, they should do so through the site/method by which the reservation was originally booked. Employees should plan early to avoid cancellation fees. Travelers who are unable to honor a reservation are responsible for canceling the reservation in compliance with the cancellation terms established by the hotel. “No-show” charges are not reimbursed unless the traveler can show that such failure was the result of business-related circumstances beyond their control.

## **Hotel Frequent Guest Programs**

Travelers may retain awards from frequent guest programs for personal use. Membership fees are not reimbursable. The company will not intervene in the reconciliation of hotel frequent guest program eligibility or coverage issues.

## **Hotel Health and Fitness Centers**

Many hotels provide fitness facilities on-site or have complimentary arrangements with local gyms. If such facilities are not available or there is a charge, a reasonable amount up to \$25 per day may be expensed.

### **Non-reimbursable hotel charges include items such as:**

- In-room movies
- Dry cleaning/laundry (except for trips exceeding five days)
- Spa services, saunas, massages
- Valet parking charges in excess of normal parking fees

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# Meals

## Business Meals

**What is a business meal?** The company defines a reimbursable business meal as a meal consumed by an employee and other invited attendees when company-related business is discussed during the meal. A business meal can also be defined as a meal consumed by the employee while the employee is traveling on company business. Business meal guidelines:

- Meeting should be intentional
  - Deliberate with a clear, reasonable, specific business purpose
  - Have a pre-established agenda
- Meal expenses must be ordinary and necessary
  - An ordinary expense is an expense that is common and accepted in the company's course of business
  - A necessary expense is one that is appropriate for the business
- Meetings should only be conducted over mealtime if the invited attendees' schedules provide no other alternative and not for the primary purpose of consuming a meal
- Food should not be used as an incentive for meeting participation

**Who pays?** When more than one employee is present at a business meal, the employee with the highest-ranking job level should pay the bill.

**Personal Meal Expenses:** The Company provides two distinct methods for reimbursement: per diem (billable to a client) and actual cost (non-billable).

- Travelers on non-billable assignments should submit the actual cost of the meal, subject to country limits (refer to Appendix B). Travelers will not be reimbursed for any amount spent over the country limit.
- The company's meal limit for foreign travel is based on the employee's home country. The company has specific rates for all countries. Please refer to Appendix B for further information.

Employees will not be reimbursed for meals when the employee is traveling in their local work area, defined as a 60 mile or 96-kilometer radius from the office or home office location during normal work hours. Daily personal meal limits (for each full day of overnight travel or an excess of 12 hours of continuous travel) in local currency are found on the GSA site (for travel within the U.S.) and Appendix B (for travel outside the U.S.).

**If an employee is at a conference or other event where meals are provided, employees may not submit expenses for reimbursement if the employee chooses to eat meals other than those**

**provided.** Employees attending Company-sponsored events will be provided with guidelines and limits for personal meals and allowable incidental expenses.

## Non-Employee Business Meal

Expenses for business meals will be reimbursed if such activities are directly related to the employee's work or advance the interest of the Company. The Company's goal is to treat clients and/or prospects to an enjoyable meal, not to impress them with our ability to spend large amounts of money.

Employees must abide by the following rules when incurring expenses related to business meals and entertainment:

- When more than one employee is present at a business meal, the most senior level employee in attendance must pay for and expense the meal
- The expense must include the date, business purpose, the names of attendees, and the companies they represent
- Any entertainment expenses must comply with applicable policies (found [here](#))
- The vendors' or clients' rules, as well as any federal or state rules governing entertainment, have not been violated

## Entertaining Clients

Any business meals and/or entertainment of clients must be consistent with the company's Code of Business Conduct and Ethics, International Anti-Corruption Policy, and Gift and Entertainment Policy (found [here](#)). **Any proposed expenditures for U.S. or other government employees require pre-approval from the Compliance Officer or designee ([compliance@anthology.com](mailto:compliance@anthology.com)).** Only employees who are authorized to entertain clients, suppliers, or guests as part of their job responsibilities may incur entertainment expenses. Such authorized employees will be reimbursed for approved expenses. Any such expenditure must directly precede, include, or follow a Company business discussion.

### **The following documentation is required for expense reporting:**

- The specific business purpose/event
- The name(s) and title(s) of all attendees

## Catered Meals

### **Meals for business meetings may be catered for in the following circumstances:**

- Internal meeting (where all invitees are Anthology employees) scheduled for longer than three hours during normal breakfast or lunch times, defined as between 8:00 a.m. and 2:00 p.m.



- External meetings (where invitees are Anthology employees as well as current or prospective clients and/or partners) scheduled during normal breakfast, lunch, or dinner times
- Meetings scheduled with supplier/vendor representatives may not be catered

**The following documentation is required for catered meals:**

- Name and location event took place
- The company affiliation
- Exact amount and date of the expense

## **Alcohol Purchase and Consumption**

Responsible and moderate consumption of alcohol during a personal meal, business meal, or business entertainment is reimbursable in accordance with company meal limits. Company employees must consider the appropriateness of alcohol during Company events and the Company's liability when serving and/or consuming alcohol. Excessive alcohol consumption will not be reimbursed. Alcohol purchased immediately following an Anthology sponsored event will **not** be reimbursed if alcohol was provided at the event.

## **Billable Travel**

### **Per Diem Rates and Calculation**

Per diem is the daily maximum allowable expense for meals and incidentals on billable travel. The reimbursement rate for U.S. domestic travel is based on the General Services Administration-maintained web site of domestic per diems by geographic area. Consult this [site](#) for the per-diem rate of the destination city or region where the work is being done. International travel per diem rates for billable travel are set by the U.S. State Department and configured in Concur. Note that per diem rates may be negotiated by a client and might be lower than the GSA rates for that location.

In accordance with the U.S./GSA's federal travel regulations, Concur prorates the meals & incidental expenses (M&IE) rate by allowing 75% of the applicable federal M&IE rate for each partial day of travel away from home.

- For the day of departure: **75%** of the applicable M&IE rate
- For each full day of travel: **100%** of the applicable M&IE rate
- For the day of return: **75%** of the applicable M&IE rate

Note: Per diem rates are based on where the work is being done, not the airport location.

The following expenses are considered part of the daily per diem rate. These expenses are not reimbursable as separate expenses.

- Expenses for breakfast, lunch, dinner, and related tips and taxes
- Fees and tips given to porters, baggage carriers, bellhops, hotel cleaning services, etc.
- Business meals taken with other employees

Seasonal Rates: The U.S./GSA rates are often adjusted for peak and off-peak seasons for popular travel destinations. Concur Expense allows for these seasonal rate changes.

## Extended Travel Per Diem Allowance

An employee working at a destination site in the same geographical location for two or more consecutive weeks has two alternatives. For each alternative, the following per diem rules apply:

- The destination/client location must not be equivalent to the general area of their “home” location
- With pre-approval from the client and the company’s Project Manager, an employee may remain within the same geographical location as the Client. Hotel and transportation costs will be expensed to the client and reimbursable to the employee. Per diem is considered for reimbursement.

## Variable Daily Meal Allowance

When the company absorbs the cost of a meal during billable travel, the traveler must take the following steps to reimburse the company for the per diem portion of the meal:

- On the client expense report, bill the full per diem for that day
- Create a second, non-billable, expense report for the negative amount of the meal per diem
- Submit both expense reports concurrently for approval

When a client provides a meal during billable travel, the traveler must take the following steps to deduct the per diem portion of the meal:

- Create Travel Itinerary per the Concur instructions
- Expense & Adjustments: Select the appropriate meal provided by the client for the appropriate day

The system will automatically deduct the correct dollar amount from the per diem for the day(s) the client provided meal(s).

Refer to the [GSA table](#) for current M & IE.

## Tips and Gratuity Limits

Tips are a reimbursable expense and should be appropriate to the location, service level, and local protocol, and never exceed 20% of the total bill. If tips are entered as a single line item on an expense report, comments noting the dates, times, and purposes of the tips must be submitted as documentation.

Item	Recommended Gratuity
Airport skycap porter	\$2 per bag
Bell service/porter	\$2 per bag
Valet parking	\$2–\$4 (if baggage, \$1 per bag)
Lobby attendant	None for opening doors or calling a taxi from the stand for help with luggage or obtaining a taxi from the street
Housekeeping	\$1–\$2 per day
Taxi drivers	15% of the total fare
Wait staff	18% of the total bill (excluding taxes)

## Other Travel and Expense Policy Information

### Home Office and Mobile Phone

These policies are still being integrated and we will update this policy when such integration is complete. Please continue to refer to the applicable PMA and PMB plans.

### Association Dues/Certification Fees

The Company will reimburse employees for annual fees required to maintain job-related professional licenses (e.g., CPAs, state bars and professional associations for lawyers, registered professional engineers). The Company will reimburse employees for annual membership dues in professional associations or societies from which the employee possesses a job-related license or professional certification. Employees must obtain prior approval from their managers before incurring the expense.

## Subscriptions/Books

### **Subscriptions are reimbursable only if they meet the following requirements:**

- They represent a legitimate business purpose.
- The subscription period is for one year only unless there is a measurable advantage or discount for a longer subscription
- The periodical is delivered to a Company office address, unless the employee is designated remote or, if electronic, a Company email address
- The reimbursed amount should not exceed \$100 per year unless approved by the department head
- Should the employee leave the Company during a subscription year paid for by the Company, the periodical should be transferred to another employee's name

## Conference and Seminar Registration Fees

The Company will reimburse employees for registrations fees required to attend conferences and seminars relevant to the employee's professional development. Employees must obtain prior approval from their managers before incurring the expense.

## Gifts

### **Non-Employee Gifts**

A business occasion may arise when a small gift, such as flowers, books, or candy is appropriate. A gift given in the name of Anthology will be reimbursed only with the prior approval of the employee's department head and Legal or Compliance. Consistent with the Company's Code of Business Conduct and Ethics and Gift and Entertainment Policy (found [here](#)), all gifts must comply with applicable law (including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Law), insignificant in dollar value and not given in consideration of any action by the recipient. No gifts should be given to U.S. or other government employees without pre-approval from the Compliance Officer ([compliance@anthology.com](mailto:compliance@anthology.com)).

Gift cards are never acceptable non-employee gifts.

### **Gift Cards and Employee Gifts**

According to the rules of the U.S. Internal Revenue Service (the "IRS") because cash and cash equivalents, such as gift cards, have a readily ascertainable value, they are considered taxable income regardless of the face amount of the gift card. For U.S. employees, the value of gift cards is considered compensation subject to federal, state, and employment tax withholding, and reporting on Form W-2. There is no minimum dollar amount for this rule. Any gift card purchased with the company funds and given to an employee will be considered taxable income to the employee and added to their Form W-2 during the calendar year the gift card was received.

Managers may request gift cards to recognize employees. Gift card purchases must be centralized with Treasury. Please submit a request for a gift card and include supporting rationale to [TreasuryOperations@blackboard.com](mailto:TreasuryOperations@blackboard.com) and [Treasury@anthology.com](mailto:Treasury@anthology.com). Employees may not purchase gift cards on Corporate Cards, department purchasing cards or with personal funds.

Gift cards or other gifts may not be provided to vendors/contractors.

Expressions of sympathy should be coordinated with HR and not put on the Corporate Card. Birthday, wedding, get well, farewell, anniversaries, holiday, and baby gifts are not reimbursable expenses.

### **Charitable Contributions & Sponsorships**

Employees are not authorized to make charitable contributions or sponsorships on behalf of the Company without pre-approval by Department Head and Legal ([generalcounsel@anthology.com](mailto:generalcounsel@anthology.com) or [compliance@anthology.com](mailto:compliance@anthology.com)). Expenses submitted without pre-approval for such will be denied.

### **Spouse/Companion Accompaniment during Business Travel**

No travel expenses, transportation, lodging, meals, or registration fees, etc., for spouses, companions, or family members accompanying employees on business travel will be reimbursed unless such travel significantly benefits the company and is specifically approved in writing by the traveler's manager or manager in advance.

If such approval occurs, the spouse/companion is subject to the same travel policy guidelines as the employee.

### **Personal/Vacation Travel**

Personal/vacation travel may be combined with business travel with the advance written approval of the employee's manager. The travel must not include any additional cost to the company for the added time, e.g., parking, lodging, meals. Travelers should exercise special care not to seek reimbursement for expenses that could be construed as personal. Concur may not be used to book personal travel only.

For personal car rental, National/Enterprise Leisure Corporate ID# **XZ56756 (PMA)** or **#XZ16Z89 (PMB)** will provide the same corporate rates without inclusion of corporate insurance coverage. Employees should make reservations directly with National/Enterprise.

Expenses related to the employee's vacation or personal travel are non-reimbursable. The employee must provide comparable price quotes from Concur to document the difference in cost between the trip without any personal travel and the trip including personal travel. The employee must obtain the comparable quote at the time that the travel reservation is booked and submit it with the expense report in Concur.

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## Risk Management During Travel

Please see **Appendix A** for information on risk management during travel.

### Insurance Coverage

Employees who are travelling on authorized company business are covered by the same programs as if they were working on the Company's premises. Please contact Human Resources for additional information.

### American Express Corporate Card Coverage

Amex Corporate Card provides baggage insurance. Please visit <https://www.americanexpress.com/us/credit-cards/features-benefits/policies/baggage-insurance-plan-terms.html> for more information. If you have any questions, you may call 1-800-228-6855 within the U.S. and if International, collect at 1-303-273-6498.

## COVID-19 Travel Policy

### Your Wellbeing

Our primary concern is always for our employees' safety and wellbeing. The COVID-19 pandemic is a rapidly evolving situation, and the company wants to ensure that employees and their families do not experience additional hardship or stress as a result of business travel. If you have any concerns regarding business travel, or personal/health circumstances preventing your ability to conduct business travel, please contact your manager or your HR Business Partner.

### Business Travel

It is the responsibility of the employee to stay fully informed on COVID-19 community spread pre-trip as well as current and post trip. Review and follow CDC and/or local authorities' guidelines. Resources include:

PMA Covid19 Travel Prep: [CTM Journey Brief](#)

PMB Covid19 Travel Prep: <https://tripsource.com>

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## Appendix A

### Obtaining a Corporate Card

The Department Manager should notify the Travel and Expense Department when a Corporate Card should be issued to an employee. Travel and Expense will provide the employee with the application links. Upon receiving credit approval, American Express will issue a card to the employee. Credit card receipt generally takes 7-10 days.

The U.S. AMEX card program is individual bill-individual pay. This means that **the Company does not pay American Express on behalf of the employee**. The company will reimburse approved travel and business expenses submitted on an expense report but will not pay interest or late fees on the account. It is the responsibility of the employee to file timely expense reimbursement requests and pay the bill by its due date. The employee is expected to comply with all terms stated in the disclosure agreement accompanying the issuance of the card.

### Use of the Corporate Card

Under no circumstances may the cardholder use or permit others to use the Corporate card to make personal purchases or purchases unrelated to company business. Doing so may result in either revocation of use privileges or other disciplinary action, including but not limited to termination of employment.

Use of the Corporate card will immediately cease upon termination of employment for any reason.

### Disputes/Unauthorized Charges

Employees are responsible for ensuring the accuracy and validity of transactions billed to the Corporate Card. There may be occasions when transactions in Concur do not correlate with the employee's receipts. The employee may not have made the transaction, the amount of the transaction may be incorrect, or the employee may have a quality or service issue. The employee is responsible for resolving disputed charges.

The first recourse is for the employee to contact the vendor to try to resolve the error. If the vendor agrees that an error has been made, the vendor should credit the employee's account. The employee will need to follow up with the vendor to make sure the credit is issued.

If the vendor does not agree that an error has been made, the employee must notify Corporate Card customer service team directly. Any transaction the employee wishes to dispute must be identified in writing within **30** days of the statement date. Disputes will be investigated by Card Issuer.

## Lost, Stolen or Compromised Company Cards

The Corporate Card is considered company property and should be secured in the same manner personal credit cards are secured. Card Issuers will never ask for sensitive account information via email, including social security numbers, account numbers, PINs, or passwords. Any suspicious email should be sent to [spoof@americanexpress.com](mailto:spoof@americanexpress.com) for Amex and [abuse@bankofamerica.com](mailto:abuse@bankofamerica.com) for Mastercard and deleted from the employee's inbox.

Lost or stolen cards should be reported immediately by calling American Express at 1-800-992-3404 and if outside the U.S., call collect at 1-336-393-1111. For Mastercard, please call Bank of America at the phone numbers listed here. Emergency replacement card will be supplied by the Card Issuer within 5 business days.

Upon receipt of the employee's call, further use of the company credit card will be blocked, or card usage restrictions will be put in place by the card issuer. Prompt action in these circumstances can reduce the company's liability for fraudulent charges.

## Guaranteed U.S. Cardholders

If an employee credit card application is declined by Card Issuer, the company may guarantee the cardholder up to a designated limit. With a guarantee, the company is obligated to pay the card balance on behalf of the cardholder should they default. If a cardholder is issued a guarantee, they are required to submit expenses and pay their balance in full each statement cycle. Their activity will be monitored and if there is a concern, the company will rescind the guarantee and balances due can be taken from the employee's paycheck. In addition, there may be other disciplinary action, up to and including termination of employment.

## Late Payment Penalties

Employees will incur late payment fees and interest if the statement balance is not paid by the due date. Cards with balances over 60 days past due will be suspended and balances over 90 days past due will be canceled. Please refer to your Cardmember Agreement for details.

## The Emerald Club

The corporate accounts with National and Enterprise Rental Car are XZ41442 (PMA) and XZ16022 (PMB). Travelers are encouraged to join the [Executive Emerald Club Program](#). As an Emerald Club member, travelers will save time when making a reservation, obtaining member discounts, and special offers, and choosing which car to rent. It is also free and available worldwide. Prior to an employee's first rental, enroll in the program. Select "Enroll Now." Add your membership number to both the National and Enterprise Loyalty program in Concur.

- Rates are inclusive of protection coverage and will be declined at the time of rental
- Emerald Club can also be used at all Enterprise Rent-A-Car locations
- Prepaid fuel and GPS selection will be declined



National will [status-match](#) any other membership.

National Emerald Club	Hertz	Avis
Emerald Club ("EC")	<b>#1 Club</b> Gold Plus Rewards	Preferred
Executive ("CE")	Five Star	Preferred First
Executive Elite ("EE")	President's Circle	President's Club Chairman's Club

## General Travel Safety

If a traveler encounters accommodation or a means of transportation that they feel may pose a threat to personal safety, the employee may make alternate arrangements.

- In accordance with company policy, mobile phones are never to be used while driving except in hands-free mode. For employees' own safety and the safety of those around them, employees are asked to use their cell phones infrequently when they are operating vehicles while on working time. Calls should be as brief as possible and employees should not dial the phone while driving. Mobile phones should not be used while driving, even with a hands-free device, in an area with pedestrian traffic, a high hazard area such as a construction zone, or during severe weather conditions. Local regulations may prohibit the use of mobile phones under any circumstances or further restrict the use of mobile phones while driving, in which case employees are to abide by local regulation. Employees are prohibited from texting or emailing while driving on company business.
- Never operate a vehicle after having any alcoholic beverages or other substances that impair driving.
- Ensure that company assets are always safeguarded. Implementing password protection on laptops, phones and other hardware is requested. Please refer to the IT policies for additional information.
- Avoid leaving valuables unattended at any location or in a rental car.
- Carry an up-to-date emergency telephone numbers list. This should always be on the traveler's person.
- Carry several days' supply of medications, even on day trips. The rest can be kept in luggage. Notes on medications, dosages, physician's name and phone number, and blood type should be kept on hand. If the traveler is on a medication that requires an injection through a

hypodermic needle, such as insulin, they may be required to present documentation from a physician at security.

## **Risk Management/Insurance**

Throughout this policy there are references to various insurance policies. In the event of a conflict between this policy and the insurance policy itself, the insurance policy governs.

## **Travel Advisories**

Safety and security are of primary importance when employees are traveling on Company business. Travel advisories that restrict travel for safety or health purposes are issued regularly by local/state government agencies. Employees should not travel to countries where U.S. Department of State critical security alerts apply. Employees should refer to the government website <https://travel.state.gov> for current travel advisories.

## **Executive Travel**

In an effort to minimize disruptions to company operations in the unfortunate event of an airline emergency, it is advisable that no more than two employees with the rank of Senior Vice President or above should be scheduled to travel on the same flight. Anthology recognizes that it is not always possible and/or practical to fully adhere to these guidelines, particularly for major Anthology endorsed and sponsored events, but every effort should be made to minimize the frequency with which this occurs.

## **Illness during Business Travel/Emergency Travel Assistance**

If an employee becomes seriously ill or is injured while traveling on Company business, the employee should report the illness and/or injury to their manager, the HR Department, and the assistance company (see below) as soon as possible. Emergency medical assistance is provided to Company employees traveling outside of their country of permanent residence and emergency evacuation assistance is provided to Company employees traveling more than 100 miles from their permanent residence on company business. This assistance is provided by Europe Assistance USA. Inside the U.S., employees can contact 1.800.243.6124 and outside the U.S., employees can call collect 1.202.659.7803. Employees can also send an email to [OPS@europassistance-usa.com](mailto:OPS@europassistance-usa.com) assistance. All information on this program can be found on the Integration Center travel page:

[Travel and Expense](#).

## **Business Travel Insurance Policy**

Employees travelling on Company business are covered under the Company's business travel insurance. The policy details are available on the Travel and Expense Site.

<https://onblackboard.sharepoint.com/sites/CollaborationHUB/SitePages/Travel-and-Expense.aspx> The insurance coverage begins at the actual start of business travel or relocation

travel, whether the point of origin is from the employee's residence or regular place of employment, whichever occurs last. Insurance ends immediately upon the earlier of an employee's return to their residence or regular place of employment. For questions or assistance, please submit an HR Service-Now ticket to Benefits/BTA Insurance.

## Immunizations

Immunization costs are reimbursable if required for business travel and not otherwise covered by insurance. Employees should check on <https://travel.state.gov/content/travel/en/international-travel.html> before international arrangement to determine if immunizations are required for the destination.

## Additional Travel Insurance Purchased by Employees

The Company will not reimburse expenses for additional travel insurance purchased, such as additional baggage insurance, trip cancellation insurance, life insurance, etc.

## Loss/Theft of Valuables While Traveling

If a loss of Company property occurs, the incident must be reported immediately to the Legal department at [generalcounsel@anthology.com](mailto:generalcounsel@anthology.com). If the loss involves electronic equipment, including but not limited to a laptop, phone, tablet, or USB drive, it should also be reported to the IT Help Desk. U.S.-based employees can reach the IT Help Desk at 1-888-719-6122. Employees outside the U.S. can contact IT Help Desk using the phone numbers located [here](#). PMA employees: U.S. 1-888-365-0050, outside U.S. 1-561-923-2637.

If the loss is the result of theft, the employee must make a report to local law enforcement authorities and submit a copy of the report to the Legal Department ([generalcounsel@anthology.com](mailto:generalcounsel@anthology.com)). If company property is stored on a personally owned device (e.g., phone or computer) and that device is lost or stolen, that information must be reported immediately to Legal and IT as well.

For the loss or theft of personal property, employees must file a claim with their personal property insurance company/agent to determine policy coverage. The Company does not provide insurance coverage for loss of any personal property, nor will it reimburse expenses for the loss or theft of personal items or valuables while traveling.

## Appendix B

### 2022 Reimbursement Limits based on Employee's Assigned Country

Location	Currency	Daily Personal Meal Limits *	Group (Employee) Meal Limits*	Personal Car Usage
Australia	AUD	123	90	0.78 per kilometer
Austria	EUR	80	58	0,44 per kilometer
Brazil	BRL	297	217	1.78 per kilometer
Canada	CAD	107	78	0.68 per kilometer
Colombia	COP	174,533	127,409	1,098.95 kilometer
Czech Republic	CZK	1,904	1,390	5.20 per kilometer
Germany	EUR	80	59	0,30 per kilometer
India	INR	Please refer to India Travel Policy	Please refer to India Travel Policy	Please refer to India Travel Policy
Ireland	EUR	66	48	0,92 per mile
Japan	JPY	10,723	7,828	76.51 per kilometer
Mexico	MXN	1,433	1,046	5.15 per kilometer
Netherlands	EUR	77	56	0,42 per kilometer
New Zealand	NZD	96	70	0.76 per kilometer
Poland	PLN	247	180	0.8358 per kilometer
Singapore	SGD	135	98	1.28 per kilometer
South Korea	KRW	114,889	83,869	570.67 per kilometer
Spain	EUR	78	57	0,43 per kilometer
Sweden	SEK	800	584	2.50 per kilometer
United Arab Emirates	AED	384	280	0.64 per kilometer
United Kingdom	GBP	73	53	0.47 per mile
United States	USD	75	55	0.655 per mile

\*Inclusive of tax & gratuity

updated 01 10 2023