



POLICY

Title: Travel & Entertainment Expense Reimbursement
Policy Number: FIN-006
Business Owner: Chief Financial Officer

Original Effective Date: 4/1/2021
Revision Effective Date: 7/1/2021
Version: 1.1

Travel & Entertainment Expense Reimbursement

Scope This Policy applies to IRC Holdco, LLC, its subsidiaries, and their controlled affiliated entities (collectively, “ARA”).

Background The purpose of this Policy is to provide guidelines for business travel, entertainment, and other expenses incurred for the business objectives of ARA.

These guidelines are designed to take into consideration what is reasonable and customary. While the policy suggests certain limits, professional judgment should be used on behalf of ARA. Adherence to this procedure will ensure the most accurate and timely payment possible.

This policy is designed to accomplish the following:

- Ensure all team members:
 - have a clear and consistent understanding of policies and procedures for business and professional travel and expenses.
 - are reimbursed for legitimate business travel and entertainment expenses.
- Provide the appropriate level of accounting and business controls to ensure expense are reviewed, approved, and recorded properly.
- This policy does not address gifts internally or externally as they are generally not reimbursable and need to be addressed separately with the Law Department, Compliance, and Accounting.

Responsibilities

Responsible Person(s)	Are responsible for...
All team members	complying with ARA's expense policy.
All team members who submit or approve an expense report	timely and accurate submission.
All team members	should have an approver of their expense reports, including the CEO (approved by the CFO or Board of Directors) and Board of Directors (approved by the CEO)
ARA	the accurate and timely processing of all properly submitted expense reports.
ARA Accounting Team	completing audits of T&E reports on a sample basis to ensure compliance and effective internal controls.
Note: ARA assumes no obligation to reimburse for expenses that are not in compliance with this policy.	
Note: Incomplete or erroneous expense reports will not be corrected by the accounts payable department and will be returned to the team member for proper resubmission.	

**Submitting
Expense
Reports/
Reporting
Guidelines**

The following conditions apply when submitting expense reports:

- Submit within 30 days of expense occurrence or could be subject to denial of reimbursement
 - For each expense report, the business purpose must be identified
 - For each individual expense item, the date, exact amount, and those in attendance must be clearly identified
 - Original receipts should be submitted for all expenses exceeding \$25.00 (except lodging which has no minimum). Use a credit card billing statement only in the event a receipt is not possible to obtain or has been lost
 - The completed ARA expense report should be submitted through Certify
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**Payment for
Expenses**

- ARA will process expenses for reimbursement when approved through the Certify software.
 - Payment typically occurs within 1-2 weeks of approval.
 - ACH/EFT is the preferred method of reimbursement.
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**Mileage for
Personal Car
Usage**

Mileage is to be paid at IRS approved rates, currently at \$0.56 a mile.

Note: The IRS calculations for mileage includes payment for gasoline, so no additional amounts are to be provided, excluding tolls, parking, or the like.

To be reimbursed for mileage, the following must be supplied:

1. Date and purpose of travel
 2. Location traveled to and from
 3. Actual miles traveled
- Mileage should be calculated by deducting an employee's normal commuting distance to their home location.
 - If an employee travels to a different location, the normal commute must still be deducted.
 - Mileage for on-call after hours travel will be reimbursed.
 - Weekend travel to the home location will not be reimbursed.
 - Weekend travel to another location will be reimbursed consistent with the guidance above.
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Tolls, Parking etc.	Tolls, Parking, etc.- Costs incurred for tolls, parking in excess of your normal commute are reimbursable.
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Car Rental	<ul style="list-style-type: none"> • While utilizing a rental car, associated tolls, parking, and gasoline expense should be submitted as individualized expenses. • ARA requires a mid-size or compact car, unless other situations require a larger automobile. • Any supplemental damage or liability coverage should be declined and will not be reimbursed as coverage exists under ARA's insurance. • Documentation for such exceptions must be included in the expense report.
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Air Travel	<ul style="list-style-type: none"> • All travel bookings should be made to secure the best possible fare, unless timing restrictions prevent doing so. • If at all possible, reservations should be made for refundable tickets at least 14 days in advance. • Only coach tickets are to be paid for by ARA. • If a flight credit is used for payment, the original receipt must also be provided. • Any paid upgrades/additional services (early boarding, seat reservation fees, seat upgrades, etc.) will not be reimbursed without the prior written approval of the CEO.
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Lodging	<ul style="list-style-type: none"> • In general, lodging should be at reasonable rates and hotels for the business travel purpose. Reasonable rates is defined as not exceeding \$175.00 per night. If the per night rate for lodging is expected to exceed \$175.00 per night, prior approval from the employee's supervisor and Controller is required. • For all travel to Beverly or Nashville, ARA team members are urged to stay at facilities with negotiated rates. • Additionally, "no-show" charges will not be reimbursed unless there is sufficient proof that the circumstances were beyond control. • Finally, tips to housekeeping and valet are reimbursable to reasonable amount.
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Meals and Entertainment	<ul style="list-style-type: none"> • Meals shall be reimbursed for out-of-town travel and other business purposes. • For all meals and entertainment, it is important that all receipts include the names of all people present.

- Both a detailed receipt showing what was ordered and the receipt showing payment should be provided.
- This is an important control step as multiple receipts could be submitted for the same meal.
- If alcoholic beverages are consumed during a business function, ARA expects that team members will act responsibly and avoid excess.
- If there are any concerns regarding an impaired ability to safely drive after such events, ARA will reimburse the cost of alternative transportation so that no one is put in danger.
- Notwithstanding the above, providing entertainment or non-business-related meals to physicians or other referral sources is strictly prohibited and will not be reimbursed, as more fully described in ARA's Physician Meals, Gifts, and Entertainment Policy.
- Any business-related meals that include a physician or other referral source must conform to ARA's CMPL-023 Referral Source Meals, Gifts, and Entertainment Policy to be reimbursed.

Cellular Phone Charges

ARA-issued Cell Phones:

This is applicable only to those employees directed by ARA to obtain a cellular or smart phone for ARA usage.

- Phones may be provided by ARA if a phone is required for routine use following approval by the direct manager and the CFO.

Continuing Education

Continuing Education should be submitted according to individual department policies and reimbursement limits.

Reimbursement should be submitted through payroll by following applicable procedures.

Dues and License Fees

Dues and license fees that are in support of the employee's role at ARA are reimbursable with appropriate documentation.

Reimbursement for licenses/certifications/recertifications should be submitted through payroll by following applicable procedures.

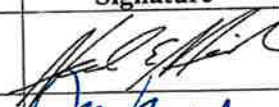
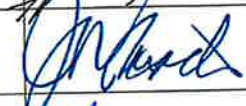
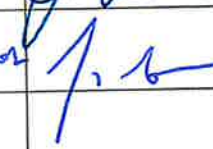
**Policy
Revisions**

- The policy owner shall review and approve this policy at least annually, based on the effective date of the policy or last revision date.
 - Review shall be documented in the revision history.
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Discipline

Compliance with this policy is a required condition of employment and non-compliance may result in disciplinary action, up to and including termination.

Policy Approval Form

Policy Title:	Travel & Entertainment Expense Reimbursement		
Department:	Finance and Accounting		
Policy Number:	FIN-006		
Effective Date:	8/15/2021		
Action Requested:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Revision * <input type="checkbox"/> Rescinded <input type="checkbox"/> Other: _____		
<small>*Revisions that are not material require only the approval and signature of the Law Department or Compliance Department representative making such revision.</small>			
Policy Review Committee	Name	Signature	Approved
Compliance Department	Neal Minahan		<input checked="" type="checkbox"/> Approved Date: <u>8/12/21</u>
Law Department	Jon Sundock		<input checked="" type="checkbox"/> Approved Date: <u>8/12/21</u>
Department Representative	George Armon		<input checked="" type="checkbox"/> Approved Date: <u>8/13/21</u>
Other (as needed)			<input type="checkbox"/> Approved Date: _____
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Other (as needed)			<input type="checkbox"/> Approved Date: _____

Revision History		
Date	Rev. No.	Summary of Change