

Great-West Financial
Vendor/Consultant Travel Policy
Last updated June 5, 2013

Purpose and Compliance

Purpose

This travel policy provides guidelines and established procedures for Vendors/consultants incurring business travel and allowable expenses on the company's behalf. All Vendors are required to follow this policy when allowed to bill Great-West for expenses permitted by contractual terms.

Scope

The Vendor/Consultant Travel Policy applies to all Vendors of Great-West Financial and its subsidiaries. Any reference to "Vendor" applies to all vendors, consultants and contractors.

Compliance

Vendors are responsible for complying with the Travel policy. Approvers (Great-West Project Managers and Supervisors) are responsible for authorizing travel and accurately reviewing expense invoices for compliance. Great-West will reimburse Vendors for all reasonable and necessary expenses allowed by contract while on authorized company business. Great-West assumes no obligation to reimburse Vendors for expenses that are not in compliance with the Vendor Travel Policy. All travel expenditures will be subject to audit.

Vendors who do not comply with this policy may be subject to:

- Delay or withholding of reimbursement
- termination of contracts due to breach

Travel Policy Questions/Contacts

Any questions, concerns or suggestions regarding the Vendor Travel Policy may be directed to the Company Travel Manager in the Travel Services Department:

Email: travel@greatwest.com

Travel Authorization

Travel authorization is given by the Supervisor or Project Manager of the specific business unit for your contract. They will also approve all of your expenditures by manual expense statement. Great-West managers or authorizers do not have the authority to override the Corporate Travel Policy.

Spouse/Companion Travel:

The companies will not reimburse travel expenses incurred by a spouse or other individual accompanying Vendor on business.

All Vendor travel should be booked by the Vendor using the Vendor's credit card and shall not be direct billed to the company. Great-West corporate rates/discount via Travel and Transport agents should be used. Vendors may not use Cliqbook. Vendors may submit all expenses that have been agreed to in the contract and pre-approved in writing by an appropriate level Great-West Manager, back to the Company for proper reimbursement.

Travel Arrangements

Corporate travel must be booked through Travel and Transport (T & T), the Corporate Travel agency Great-West has chosen.

Reservation Procedures:

Company suggests booking at least 14-21 days in advance whenever possible. All air travel, lodging, car rental and rail travel reservations including en route changes, must be booked through T & T. Reservations can be made through a T & T Agent:

Travel and Transport
8820 West 116th Circle
Suite C
Broomfield, CO 80021
Phone: 866-822-1306 dial prompt 2 then 1 for a domestic agent
Fax: 303-412-0690
Email: greatwest@tandt.com

Hours of operation:

Monday through Friday
7:00 AM to 5:30 PM (Mountain Standard Time)

Domestic Air Travel

Making Air Travel Reservations:

Air travel reservations must be made through T & T. No exceptions can be made to this rule. Air travel reservations can NOT be made directly with the airlines.

Travel and Transport: Toll-free 1-866-822-1306.

Airline Class of Service:

All domestic air travel must be in Economy class of service. Vendors are expected to use the lowest logical airfare available. Vendors may use Business class only when Economy class is completely sold out and no alternate flights are available – an explanation must be provided on the expense invoice. All Vendors are expected to use the lowest available non-stop airfares unless directed differently by T&T. When it makes sense, connections should be considered. When a Vendor does not book the lowest available non-stop airfare, hotel or car rental rate offered (especially from preferred vendors), the Travel & Transport travel counselor (travel agent) notes the policy exception. This will be included in reports that are reviewed by the Company Travel Administrator, Accounting and appropriate management. It is never allowed to fly on an airline with a higher fare in order to receive preferred frequent flyer miles or in order to upgrade to first class. This will be considered out of compliance.

Upgrades for International and Domestic Air Travel:

Upgrades at Great-West's expense are NOT permitted. Upgrades are allowed at the Vendor's personal expense.

Lowest Logical Airfare Definition:

Vendors are expected to book the lowest logical airfare (domestic or international) as determined by a T & T travel counselor based on the following (to the extent possible):

- Minimum 7-14 day advance purchase
- Flexibility in departure and arrival times
- Discount fares which are non-refundable or have cancellation/change penalties
- Use of alternative airports where applicable (i.e. Midway versus O'Hare in Chicago)
- Flights which are non-stop or connect en route

Vendors are not expected to book connections unless it is a significant savings and time effective.

Preferred Airlines:

Great-West has negotiated special rates with specific airlines. Current preferred airlines are United and Frontier. Vendors flying on business must use these airlines whenever possible if these are most cost effective.

Airline Frequent Flier Programs:

Vendors may retain frequent flier program benefits. However, participation in these programs must not influence flight selection, which would result in an increase of airfare beyond the lowest logical airfare as defined in the Vendor Travel Policy.

Lost Baggage and Baggage charges:

The responsibility for retrieving and compensating travelers for lost baggage lies with the airlines. Great-West will not reimburse Vendors for personal items lost or stolen while traveling on business. Be sure to report any claims to the airline as soon as possible.

Vendors will only be reimbursed for baggage charges as follows:

Up to 4 nights travel per trip – 1 bag

5 nights or more per trip – 2 bags

The receipt for checked baggage costs must be attached to the expense invoice.

Denied Boarding Compensation:

Airlines occasionally offer free tickets or cash allowances to compensate travelers for delays and inconveniences due to overbooking, flight cancellations, changes of equipment, etc.

Vendors traveling may volunteer for denied boarding compensation only if:

- Flying outside normal working hours
- A delay will not result in an interruption in, or loss of business

Vendors who are involuntarily denied boarding should:

- Get rebooked on another flight
- Obtain a free voucher from the airline
- Keep the free travel for personal use

Overnight Delays:

Should an airline delay necessitate an overnight stay, Vendors must first attempt to secure complimentary lodging accommodations from the airline. If unsuccessful, Vendors should contact T & T to book accommodations.

Changes and Cancellations:

The purchase of a non-refundable ticket provides substantial cost savings, and is strongly encouraged.

Unused, non-refundable tickets may be exchanged for future airline travel. Rules vary by airline and penalties apply. Vendors should make an effort to keep itinerary changes to a minimum to reduce excessive penalty charges by the airlines and additional transaction fees from T & T. When changes are anticipated, the Vendor should wait until the last possible date to issue/reissue the ticket. This will result in lower fees paid to the airline and T & T. When a trip is cancelled after a ticket has been issued, Vendors should immediately contact a travel counselor at T & T. In most cases it is possible to retain most of the value of the ticket to use it on a future trip. Be sure to contact a T & T travel counselor prior to the originally scheduled departure date and time otherwise the entire value of the ticket will be lost. Should you decide to make changes to a ticket for personal reasons the change fees and additional costs incurred will be at the personal expense of the Vendor.

Accommodations

Making Hotel Reservations:

Hotel reservations must be made through T & T.

Hotel Selection Guidelines:

Vendors are required to use:

- Properties where the company has negotiated rates. A list of preferred hotels can be obtained by either the project manager or by sending an email to travel@greatwest.com.
- If a company negotiated hotel rate is not available, travelers must use the least expensive accommodations in a similar hotel category within reasonable distance to the actual meeting/event location.

Long-Term Hotel Stays:

Vendors should contact Travel & Transport regarding long-term stay (over 30 days consecutively) discounts for hotel rooms and apartment hotels.

Hotel Spending Guidelines:

Vendors are expected to use negotiated or preferred rates whenever possible in applicable locations. Vendors will be reimbursed for actual and reasonable hotel room costs. If the hotel rate includes free breakfast, any other breakfast expense is disallowed. Tips for hotel staff are reimbursable when confined to reasonable limits, as determined by the services required and received.

Room Guarantee:

Unless otherwise instructed, T & T will guarantee all rooms for late arrival with the Vendor’s credit card.

Hotel Cancellation Procedures:

Vendors are responsible for canceling hotel rooms and must contact T & T or the hotel directly. Vendors should request and record the cancellation number in case of billing disputes. Vendors will be held responsible and will not be reimbursed for “no-show” charges unless there is sufficient proof that the billing is in error. Vendors should note that cancellation deadlines are based on the local time at the hotel. Cancellations deadlines are indicated on the travel itineraries you receive.

Hotel Payment Procedures:

Hotel costs must be paid using the Vendor’s credit card. When creating expense invoices, hotel bills must be broken out by category. Please separate charges such as, but not limited to meals, internet, phone and parking.

Hotel Frequent Guest Programs:

Many hotels have frequent guest programs that reward travelers with free accommodations in exchange for a given number of paid room nights at the hotel. Awards (from these programs) are retained by the Vendors for personal use. However, participation in these programs must not influence hotel selection. Any membership fees associated with joining these programs are not reimbursable.

Rental Cars

Rental Car Guidelines:

Vendors should drive a car to their destination when driving is more cost and time effective than airline travel. Vendors may rent a car when:

- It is less expensive than other transportation modes such as taxis, hotel shuttles, airport shuttles or airport limousines.
- Super Shuttle services is not available to hotel from airport

Making Rental Car Reservations:

Rental car reservations must be made through T & T.

GPS Navigational Systems:

Great-West will not reimburse Vendors for GPS navigational systems in cars. Should Vendors choose that service as an option; it will be at Vendor’s own personal expense.

Rental Car Categories:

Vendors should book the following rental car categories:

- Compact
- Midsize/Intermediate

When picking up a rental car, Vendors should:

- Check with the rental car agent for any promotional rates, last minute specials or free upgrades.
- Inspect the vehicle and report any damage found before the vehicle is accepted.

Preferred Rental Car Suppliers:

The company has negotiated rates with Avis/Budget and Enterprise.

Rental Car Insurance – Domestic:

Vendors must have made provisions for insuring rental cars against damage. Insurance coverage for rental cars is not reimbursable.

Rental Car Cancellation Procedures:

Vendors are responsible for canceling rental car reservations and must contact T & T. Vendors should request and record the cancellation number in case a billing dispute arises. Great-West will not reimburse cancellation charges caused by the Vendor.

Returning Rental Cars:

Every reasonable effort must be made to return the rental car:

- To the original rental location unless approved for a one-way rental
- Intact (i.e. no bumps, scratches or mechanical failures)
- On time, to avoid additional hourly charges
- With a full tank of gas

Under no circumstances should the fuel option be purchased. The fuel option is the ability to return the car with an empty tank of gas and have the rental car company refill the tank with gas. Please decline this coverage and refill the tank before returning the rental car. Make sure gas receipts are submitted with expense invoices.

Rental Car Payment Procedures:

Unless otherwise instructed, rental cars must be paid using the Vendor's credit card.

Rental Car Accidents:

Should an accident occur, Vendors are responsible for all reports and resolving any issues.

Other Transportation

Car/Limousine Service:

Car/Limousine service is not available and non-reimbursable.

Personal Car Usage Guidelines:

Mileage for personal car usage by Vendors is not reimbursable. Great-West will not be responsible for damage or loss personal vehicles or passengers of Vendors.

Telephone Usage

Business Phone Calls:

Vendors will be reimbursed when using their personal telephone, calling cards or home phone for business phone calls:

- Which are reasonable and necessary for conducting business
- When an original bill is attached to the expense invoice

Personal Phone Calls While Traveling:

Vendors will not be reimbursed for personal telephone calls.

Use of Air Phone:

Vendors will not be reimbursed for any telephone calls made from air phones.

Use of Hotel Telephones:

Vendors may be reimbursed reasonable charges related to Great-West business telephone calls made at their hotel accommodations. When staying at a hotel, Vendors should find out the local and long distance rates. Avoid making phone calls that have an added surcharge. Information on added surcharges to phone calls is usually listed in the hotel information located in the room. It can be acquired by calling the hotel front desk. To avoid substantial charges added by hotels to telephone bills, Vendors should:

- Use a cell phone, charge/credit card, calling card, public phone or call collect whenever possible.
 - Press the #key after each call and wait for the tone, then dial the next phone number when making several long distance calls
 - Use 1-800 numbers for business calls whenever possible
 - Phone from local company offices whenever possible
-

Travel Insurance

Travel Insurance Coverage:

- Vendors will not be reimbursed for travel insurance coverage.
-

Meals and Entertainment

Personal Meal Expenses:

Personal meals (breakfast, lunch and dinner) are expenses incurred by Vendors traveling when dining alone on out-of-town business trips. Vendor will be reimbursed for personal meal expenses according to actual cost. When utilizing Great-West preferred hotels that include free breakfast, no other breakfast expenses will be reimbursable. Lunches and dinner expensed should not be lavish or excessive. Snacks and beverages outside of meals will not be reimbursed. Gourmet dining will be considered excessive and not reimbursable. When dining, alcohol is not reimbursable and is considered a personal expense. When departing on a business trip and traveling via air, breakfast in transit or at Vendor's departing airport is not reimbursable unless flight departure time occurs between 6-9am local time. When returning home from business travel by air, no meals will be reimbursed after the return flight lands. **Meal costs for social occasions, such as birthdays, secretary's day, etc. are not classified as business meals and will not be reimbursed.**

Tipping for Meals:

Tips should be no more than 20% of the bill. Any tips considered excessive will not be reimbursed. As a general rule, Vendors should not tip more than they would on a personal trip and tip only to the level of service received. On big party checks most restaurants will automatically charge an 18% gratuity. Also, be sure to check your receipt prior to adding tip for this line item to avoid over-tipping.

Payment for Meals:

Expense invoices must include itemized business meal receipt as well as total amount plus tip receipt.

Expense Reporting

Submitting an Expense Invoice:

All expenses should be submitted on a monthly basis to a Great-West. All expense receipts should be attached to an invoice and send to Great-West Financial at P.O. Box 1700, Denver, CO 80201 or email accountspayable@gwl.com. Expense invoices should be submitted in an orderly fashion. **All expenses must be filed on the next monthly invoice and in no event later than 90 days from the date of transaction. Expenses filed after the 90 day period WILL NOT REIMBURSED. Great-West Project Manager will approve all expenses in accordance with the Great-West policy.**

Documentation Requirements:

Vendors must submit the following documents with their expense invoice:

- Air - itinerary or invoice including dollar amount and ticket number. Boarding passes are not an acceptable receipt.
- **Hotel bill – copy of hotel bill and proof of payment. Hotel bill should itemize each category of charge, i.e. parking, internet service separate from room charge.**
- Car rental – rental car agreement plus credit card receipt or other proof of payment
- Meals– all receipts (cash or credit card transactions) and documentation of purpose and names of attendees.

All food and beverage must fall under Business meal guidelines and must have a receipt.

Acceptable Receipts:

The following receipts are acceptable:

- Copy of original receipts completed by the Vendor
- Customer's copy of credit card slip
- Original Phone bill including detail

Tips and Gratuities:

Tipping for Waitstaff: Please reference the Meals section of this policy

Tipping Guidance on Valet, Maid Service and Taxi

1. Taxi Service - Use the 15 percent tip rule for taxi cab drivers. A tip of 15 percent of your cab fare is considered reasonable. A slightly higher allowance is acceptable if the driver does something extra, like assists with bags. A maximum of 20% is allowable.

2. Hotel Courtesy Shuttles - \$1-\$2 per person maximum

3. Porters/Bell services - \$1 per bag - \$2 for very heavy bags

4. Maid Service - \$1-\$3 per day depending on the grade of the hotel.

5. Valet/Parking attendant - \$1-\$2 per access to rental car (if rental car is an allowed expense).

Please note: some hotels are adding a daily fee to the cost of the room. These fees can include items such as newspapers, internet, maid service and bell services. If a service fee is already added to the hotel bill, extra tips for hotel staff are not reimbursable.

Incorrect or Incomplete Expense Invoices:

- Vendors will be notified of any expenses that are not allowed by Great-West Project Manager or Accounts Payable.
- May result in a delay or non reimbursement of specific items

Reimbursable/Non-Reimbursable Expenses

Vendors will be reimbursed for the following miscellaneous expenses:

- Air freight for business purposes
- Business office expenses (fax, copy services, etc)
- Business phone calls (corporate calling cards available through telecom and should be used as much as possible)
- Hotel internet service (please expense under Misc. Travel)
- Currency conversion fees
- Faxes
- Food and Beverage according to policy
- Gasoline for rental cars
- Ground Transportation
- Laundry/dry cleaning/suit pressing for trips exceeding **5 days**
- Overnight delivery/postage
- Parking (excludes daily/weekly/monthly parking fees at field offices for Vendors of that office)

- Room service charges (food and beverage according to policy)
- Public transportation (bus, train, taxi)
- Tips for wait staff
- Tolls

Non-Reimbursable Expenses:

Vendors will NOT be reimbursed for the following miscellaneous expenses:

- Airline Club membership dues
- Upgraded airline seats
- Fly Clear Travel Program and other airport pass programs
- Annual fees for personal charge or credit cards
- Babysitting
- Barbers and hairdressers
- Car washes
- Clothing
- Corporate card delinquency fees
- Excess baggage charges, unless extenuating circumstances apply
- Expenses for travel companion/family members
- Expenses related to vacation or personal days while on a business trip
- Finance charges on Corporate card
- Golf fees (when not part of customer entertainment)
- Gum, candy, snacks, cigarettes or other tobacco products
- Spa Treatments
- Helicopter services for airport transfers (unless business related)
- In-flight telephone charges (unless business related)
- Loss/theft of company paid airline tickets
- Loss/theft of personal funds or property
- Lost baggage
- Luggage or briefcases
- Books, subscriptions (unless business publications)
- Medical bills incurred during domestic travel
- Non-compulsory insurance coverage
- “No-show” charges for hotel or car services
- Optional travel or baggage insurance
- Parking or Traffic tickets
- Daily/Weekly/Monthly parking fees at field offices for Vendors of that office
- Personal accident insurance
- Personal entertainment (including sporting events and concerts)
- Movies and television (theater, airline or hotel)
- Personal property insurance
- Personal telegrams
- Personal toiletries
- Pet care
- Repairs due to an accident
- Routine maintenance/tune-ups
- Shoe shines
- Souvenirs/personal gifts
- Spouse/companion travel
- Gifts to Vendors (includes birthdays/showers)
- Gift Certificates and meals to individuals for designated employee appreciation days (boss’s and secretary’s days)
- Cakes and food for the types of celebrations noted above
- Decorations
- Holiday parties