

# **Global Travel, Meeting & Expense Policy**

**For All Employees of**

**HILL-ROM HOLDINGS, INC. AND  
SUBSIDIARIES**

**EFFECTIVE June 1, 2021**

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**1.0 PURPOSE, SCOPE AND RESPONSIBILITIES**

**1.1 Purpose**

This policy is intended to facilitate required business travel, meeting and event expenses, while managing costs and maintaining efficient business processes. It is not intended to be onerous or unduly restrictive. This policy is designed to:

- Ensure all employees have a clear and consistent understanding of policies and procedures for business travel, meeting and event expenses;
- Ensure all employees are reimbursed for legitimate business travel, meeting and event expenses;
- Provide guidance on how to document and report expenses related to interactions with Health Care Providers (HCP);
- Maximize the Company’s ability to negotiate discounted rates with preferred suppliers and reduce travel expenses; and
- Provide the appropriate level of accounting and business controls to ensure that expenses are substantiated and reviewed and approved by the appropriate person.

Please direct any concerns regarding this policy to the Hillrom Corporate Controller or Director of Global Travel.

This policy supersedes all previous directives relating to travel, meeting and event policies, and employee expense reimbursement from any other source. Under no circumstances may any employee modify this policy to be less stringent in application.

**1.2 Scope**

As used in this policy, “Company” and “Hillrom” shall mean Hill-Rom Holdings, Inc. and any of its direct or indirect subsidiaries or affiliates.

This policy applies to all employees (and any external third party whose travel is paid by the Company, unless covered under contract) of Hillrom, regardless of their location, including all majority-owned subsidiaries. It governs expenses incurred during Company travel, as well as expenses incurred locally regarding Company business. The Company may at times apply tighter travel restrictions.

To the extent that a Hillrom business unit, legal entity, location in which Hillrom operates or any Hillrom business or function has adopted more stringent requirements than set forth under this policy, employees of that business unit, legal entity and/or at that location or within that function must follow such more stringent requirements. Employees should consult with their local finance leader to determine if more stringent restrictions are applicable.

**1.3 Responsibility**

**Employee Responsibility**

- Employees are responsible for reading and complying with this policy.
- All employees are to conduct themselves appropriately and professionally and to comply with the Company’s Global Code of Conduct in all their travel experiences.
- Prior to travel, if a particular situation is not covered by policy, employees should contact their manager/supervisor or the Manager of Global Travel for direction.

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- If a situation arises unexpectedly while traveling and employees are not able to reach their manager/supervisor or the Manager of Global Travel, employees should determine the most reasonable and economic option and make the best business decision aligned with this.
- Knowledge of and adherence to local laws at the travel destination are the responsibility of the employees.
- Employees are responsible for the timely submission (within 30 days of when a charge is made on your Travel Card, or the last date of travel, whichever is earlier) of complete and accurate expense reports. Expense reimbursement is not intended to provide additional compensation or any inducement for travel.
- Employees who do not comply with policy may be subject to delayed, partial or forfeited reimbursement, travel card suspension, and/or disciplinary action, up to and including termination.
- Delegation of expense report preparation does not relieve the employee of the responsibility of complying with this policy.

**Manager/Supervisor Responsibility**

- Manager/Supervisors are responsible for assuring their direct reports are complying and submitting expense reimbursement documents as stated in this policy.
- Manager/Supervisors are responsible for the timely review and approval of valid expense reports of their employees within 14 days of the submission of a report by their direct reports.
- Manager/Supervisors who approve employees' expenses that do not comply with this policy may be subject to disciplinary action, up to and including termination.
- Delegation of the review of their employees' expense reports does not relieve the manager/supervisor of the responsibility of complying with this policy.
- Manager/Supervisors are responsible for conveying to their employees the importance of avoiding real or perceived conflict(s) of interest as it relates to choosing travel providers.

**Compliance**

- It is Hillrom's policy to ensure that all travel, meeting and event expenses meet our requirements regarding ethical conduct as outlined in the Global Code of Conduct and are executed with proper review and authority.
- The Company assumes no obligation to reimburse employees for expenses that are not in compliance with this policy.
- Violation of any provision contained in this policy may subject involved employees, including approving managers or supervisors, to corrective action up to, and including termination of employment and/or disciplinary action.
- All expense reports submitted are subject to review, monitoring and audit for compliance with this policy. That includes, but may not be limited to, the propriety of the expenditures, adequate and supporting documentation, and supervisor review. Results of expense report reviews and audits may be periodically submitted to the ELT and Corporate Finance for review. Failure to comply with this policy may subject involved employees, including approving managers, to corrective action up to, and including termination of employment, travel card suspension, and/or disciplinary action.

**2.0 GENERAL INFORMATION**

For additional information, please visit the Hillrom Travel website: [DASH PORTAL](#).

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This policy and corresponding Hillrom Connect website have been designed to facilitate compliance with the Company’s programs and to assist you in using them effectively and efficiently.

Employees are expected to use Company funds and resources in a prudent and appropriate manner to facilitate Company business – whether it is internal to the Company or with our external customers and suppliers. All employees and contractors (when representing Hillrom or its subsidiaries) are to conduct themselves appropriately and professionally and to comply with our Company’s Global Code of Conduct in all their travel experiences. The Global Code of Conduct may be found at the following link: [Global Code of Conduct](#)

Managers of traveling employees, and approvers of expense reports, are responsible for coaching employees on cost effective management of business travel. The traveler and his/her line manager have ultimate responsibility to ensure that Company money is spent appropriately.

**2.1 SAP Concur**

SAP Concur is the Company’s integrated global solution for managing all travel expenses. Employees are required to process all Company travel expenses within the required guidelines as defined in this Policy, via the Concur application, if available to the site.

If your site does not use Concur, please contact your local finance leader for information on how to process travel expenses; this policy applies equally to those locations not using Concur. The Company may use functionality within Concur to analyze, audit and/or monitor employee spending for compliance with this policy.

**2.2 Travel Card**

The use of the Company’s designated Travel Card to pay for travel-related expenses is required wherever it is accepted. Where a Travel Card is available to employees, all employees who travel are expected to apply for a Travel Card by completing the application form. For the employees in the United States and Canada, the Travel Card application can be found on Hillrom Connect at the following link: [Finance Forms](#). For employees in other locations, please contact your local credit card administrator which can be found on the Hillrom Travel website: [DASH PORTAL](#) [under Travel Resources-Global].

Annual fees, if any, for these cards will be paid by the Company. Personal credit cards may only be used for Company travel expenses in circumstances where an employee has not been issued a Travel Card or when a vendor does not accept the Travel Card. In the event an employee has not yet received a Travel Card, airline purchases will be charged directly to the Company.

Cash advances are not permitted on the Travel Card.

When travelling internationally and using the Travel Card, employees may be given the option to pay for a travel expense in local currency or in their home country currency. In these instances, the employee should always select local country currency as the Company receives favorable currency exchange rates from our Travel Card providers.

The Travel Card shall not be used for paying recurring operating expenses for the Company. These types of expenditures should be paid through accounts payable or use of a procurement card.



Examples include, but are not limited to, temporary rental of storage facilities, shipping supplies, trade show and convention spending, recurring registration fees and charitable contributions.

Using the Travel Card for non-business-related expenses or personal expenses is **STRONGLY** discouraged. In the rare circumstance when the Travel Card must be utilized for these types of expenses, the charge must be marked as personal on the expense report. Any reimbursement due to an employee will be reduced by the amount of these types of expenses. If the amount of these types of expenses exceeds the amount to be reimbursed, the employee should provide reimbursement of the excess these types of expense to the local site finance personnel or Corporate Accounting.

Your Travel Card is a valuable tool which provides benefits to both the Company and you. Using a Travel Card provides valuable information about travel patterns and costs that can be used in negotiations with suppliers. Using your Travel Card also benefits you by minimizing the amount of cash you must carry and making it easier to account for expenditures.

### 2.3 Expense Limits and Approval Thresholds

All expense limits and approval thresholds in this policy are denoted in USD, unless otherwise noted. These limits and thresholds should be converted into local currency using the Annual Plan exchange rates as published by Treasury for that year. These rates can be found at [ANNUAL PLAN EXCHANGE RATES](#).

### 2.4 Alternatives to Travel

Before planning a trip, determine if there is a way to meet your objective without traveling. Today's technologies usually enable collaboration at a significantly lower cost and with less time away from home and work. Travel is expensive and takes a toll on work and family effectiveness – leverage technology and the internet as much as possible to meet your business needs. These technologies include:

- Videoconferencing
- Audio-conferencing
- Virtual Meetings (e.g. WebEx, Microsoft Teams Meetings – or other similar tools)

Employees should consider, and use, the above technologies in lieu of travel between Company sites. For information on these tools, please contact the Company's IT Service Desk. When travel is required, make travel decisions that meet the needs of the business and achieve the optimal cost consistent with your safety and well-being.

### 2.5 Pre-Approval for International Travel

International travel (travel between continents) requires pre-travel authorization from the employee's ELT representative or Regional President. Such approval should be documented in writing (e.g. email) and submitted as part of the employee's expense report. Pre-travel authorization is not required for travel within the same continent however the traveler should explain to their supervisor why the trip is necessary—that the trip objective cannot be accomplished by other means (i.e. web or video conferencing) and that the potential benefits of the trip justify the expense.



## 2.6 Policy Violations

Safety, Risk Management, Compliance, Laws and Government reporting requirements are taken into consideration in this policy. If a business traveler disregards the policy intentionally or repeatedly, one of the following actions may be taken:

- Financial consequences for you (e.g. delayed reimbursement, Company denial of reimbursement for non-allowed expenses, etc.).
- Your manager may require you to have extra approval steps in your travel planning (e.g. pre-trip authorization) or your Company-sponsored payment privileges may be suspended.
- Violations of the Company's travel policy (e.g. managing or spending Company funds inappropriately) may result in disciplinary action, up to and including termination of employment.

## 2.7 Use of Preferred Travel Agencies

All travel arrangements including air travel, lodging, car rental and rail travel must be booked through the Company's designated travel agencies. The Company does not permit travelers to book business travel arrangements via the airlines directly, on the internet, or through third party independent travel agencies. If you find lower costs for your travel, contact your agency immediately to discuss optional booking procedures. Enroute changes should be made through the same location when possible. This will assist the Company in locating the traveler in emergency situations.

Your designated travel agency is based on where you live and can be found on the Hillrom Travel website: [DASH PORTAL \[under Contacts\]](#). If you do not see a designated travel agency for your country, please contact the Manager Global Travel, at [travel.services@hillrom.com](mailto:travel.services@hillrom.com) for assistance/referral.

The travel agency is responsible for providing you with options consistent with the guidelines established in this policy. The traveler is responsible for the accuracy of his/her travel schedule including dates, times, flights, and routing after the travel agency has confirmed the itinerary over the phone or by email to the traveler or travel arranger.

Employees expecting to travel at least once per year should have a traveler profile on file with their designated travel agency to ensure that pertinent details and preferences are adhered to in the reservation process. The traveler is responsible for informing the travel agency of all personal travel information changes or updating them in the approved online booking tool (if available in their country). This will include Travel Card number and expiration date, phone number, seat preferences, etc.

## 2.8 Use of Preferred Vendors

Travelers are required to utilize preferred vendors (airline, lodging, car rental, rail, etc.) with whom the Company has negotiated special rates and/or concessions, if equal to or less than other options. Should an employee choose not to utilize a preferred vendor, he/she may not be reimbursed for the expense. Preferred vendors are listed on the Hillrom Travel website: [DASH PORTAL \[under Travel Resources\]](#), through the booking agent at your designated travel agency, and in the online booking tool (if available in your country).



## 2.9 Additional Travel Guidelines and Restrictions

- **Hillrom Global Code of Conduct** - Employees are required to adhere to the Company's Global Code of Conduct, which requires employees to adhere to the highest standards of business conduct, including while traveling on Company business.
- **Gambling Trips** - The Company policy is that we will not take employees or customers gambling. Gambling trips are not to be planned as part of either customer visits or internal business meetings.
- **Interactions with Health Care Providers** - Please reference the Global Policy on Interactions with Health Care Providers, located on Hillrom Connect or contact the Hillrom Global Compliance Office.
- **Upgrades** - Any upgrades for air, car, hotel, etc. may be made at the traveler's expense or when the Company incurs no additional cost.
- **Travel Tipping** - Travelers will be reimbursed for non-meal tips at a reasonable cost with sufficient itemized documentation. (e.g. \$1 per bag for porter, shuttle driver, 10%-20% for taxi, etc.).

## 2.10 Spouse/Companion Travel

The Company does not permit spouse/companion travel and will not reimburse travel and event expenses incurred by a spouse or other individual accompanying an employee on business unless:

- There is a bona fide business purpose for taking the spouse or other individual.
- The reimbursable spouse/companion travel is approved in advance by your ELT member with the business purpose clearly stated. Such approval should be documented in writing (e.g. email) and submitted as part of the employee's expense report.

All reimbursed expenses incurred for spouse/companion travel will be fully taxable to the employee in countries where applicable. When a spouse or other individual accompanies an employee at the employee's expense for personal reasons, the additional cost must be separated and excluded from the employee's reimbursable expenses on the expense report.

## 2.11 Emergency Travel Assistance

Your agency will provide you with a 24-hour number to call in the event you need to change your travel arrangements and the agency is not open.

In case of an emergency please contact the TravelSafe hotline at +1 312-894-0147 or via the TravelSafe with Worldcue mobile application. Information on the TravelSafe program may be found on the Hillrom Travel website: [DASH PORTAL](#) homepage.

## 2.12 Travel Insurance Coverage (U.S. Employees Only)

In the event of accidents while traveling on Company business, the following Company provided coverage may apply:

- Accidental Death and Dismemberment – Reference the Summary Plan Descriptions of your Employee Benefits Booklet.
- Business Travel Accident – Reference the Summary Plan Descriptions of your Employee Benefits Booklet.

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- Group Life Insurance – Reference the Summary Plan Descriptions of your Employee Benefits Booklet.
- Workers Compensation – Differs by State.

Please also see [U.S. Health & Wellness Benefits](#) for more information.

**2.13 Travel Insurance Coverage (All Non-U.S. Employees)**

The Company provides Business Travel Accident coverage for all Non-U.S. Employees. Other travel insurance coverages vary from region to region. Please consult with your local Human Resource representative for more information.

**2.14 Travel Card – Travel Insurance**

Under terms of the Company sponsored Travel Card agreement, cardholders may automatically receive certain travel insurance benefits when using the Travel Card to pay for related expenses. These benefits may differ by country. Country specific benefits can be obtained by calling the phone number on the back of your Travel Card.

**3.0 AIR TRAVEL**

All travelers should make travel plans early enough to book flights at least 14 days before your trip begins for travel within a continent and at least 21 days in advance for travel between continents. If available in your country, use the Company’s on-line/Internet-based booking tool to confirm your air travel. If your country does not offer such a tool, work closely with your designated travel agency (see Section 2.7) as they will recommend flights based on your business needs and will identify selected routes and/or carriers where the Company has specially negotiated rates. Travelers will be required to utilize preferred vendors if the fare offered is equal to or less than that offered by a non-preferred vendor. This will ensure that the Company is compliant with contractual agreements.

Use of personal frequent flier miles/points/vouchers to upgrade to a higher class of service or reduce or offset the cost of a ticket is not reimbursable.

The Company will not reimburse the cost of seat assignments unless no seats are available free of charge at time of booking.

An airline receipt obtained from the airline at time of check-in or travel invoice with the purchased ticket amount must be submitted with your expense report regardless of the method of payment.

For assistance in obtaining visas and/or passports, travelers should contact their designated travel agency. Travelers should ensure that their visas and passports have sufficient remaining validity when traveling outside their home country. The cost of obtaining and renewing visas and passports are reimbursable by the Company.

Tickets purchased thru the designated travel agency will prompt an email from WorldAware / Crisis 24 to the traveler regarding their trip. The traveler is responsible for registering their trip in WorldAware / Crisis 24’s system. Travelers can log-in to the system and research their destinations. Email alerts are sent to the traveler about security and health related issues. Please see the Global Travel Risk Management Policy on the Hillrom Travel website: [DASH PORTAL](#) [under Travel Safe Program Overview]

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**3.1 Airline Class of Service**

Employees are to use the lowest logical airfare as defined in Section 3.2. Class of service is predicated upon the length of individual flight segment and position in the Company as follows:

Position	Segment Duration		
	< 6 hours	> 6 hours and < 10 hours	> 10 hours
ELT	Standard Business	Standard Business	Standard Business
Vice Presidents and above	Coach / Economy	Standard Business	Standard Business
All other employees	Coach / Economy	Coach/ Economy	Premium Coach / Economy Plus

**3.2 Lowest Logical Airfare**

Travelers are expected to book the lowest logical airfare as determined by the travel agency for travel within a continent based on the following parameters:

- Routing requires no more than one connection each way.
- Routing does not increase the one-way total elapsed trip time (origin to destination) by more than two hours.
- Time Window: Departure/arrival must be no more than two hours before or after requested time.
- Savings must be at least \$250 of the round-trip coach/economy fare to offset schedule inconvenience.
- Non-refundable fares may be declined if the cost differential is less than \$150.
- Travelers are required to use our preferred vendors if the cost of the ticket is equal to or less than that offered by a non-preferred vendor.
- Upgrades to Business or Premium Economy classes are not reimbursable unless no other seats are available in your permitted class of service at the time of booking.

For travel between continents, travelers are expected to book the lowest logical airfare based on the following parameters:

- Routing does not increase the one-way total elapsed trip time (origin to destination) by more than three (3) hours.
- Savings must be at least \$1,000 to offset schedule inconvenience.

Alternate airports will also be considered when researching the lowest fare available (e.g. traveling to/from Batesville, the airports offered would be Cincinnati or Indianapolis. Other examples would be Dallas Ft. Worth and Dallas Love Field, Chicago Midway and Chicago O’Hare, or London Gatwick and London Heathrow).

**3.3 Frequent Flyer Program Benefits**

Traveling employees may retain frequent flyer program benefits for their personal use. However, participation in these programs must not influence flight selection, which would result in incremental cost to the Company beyond the lowest logical airfare available, as defined, or which results in the use of a non-preferred vendor over a preferred even if the costs are equal. Use of personal frequent flier miles/points/vouchers to upgrade to a higher class of service or reduce or offset the cost of a ticket is not reimbursable.

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**3.4 Changes or Cancellation of Travel**

If you must change or cancel your travel arrangements, do so as soon as possible to avoid penalties. For air travel, many tickets lose their value if not cancelled prior to travel. Unused non-refundable tickets will be held by the agency and when possible, applied to future travel. Your unused ticket can be submitted for reimbursement by attaching the invoice emailed to you by the agency as your receipt/proof of purchase.

For travel booked using one of the Company’s online booking tools, cancellations should be made via the online tool. Changes to air travel, after a ticket has been issued, must be made directly with the travel agency.

When a ticket is exchanged for new travel, the exchange fee and any additional fare charged must be documented and e-mailed to you. This must be included with your expense report. Refundable tickets will be processed for credit as soon as possible after receipt by the travel agency. Typical processing time for the airlines is 6 weeks. Travelers who do not receive credit for refundable tickets in a reasonable time should call the travel agency that booked the ticket.

**3.5 Key Personnel Air Travel Policy / Employees Traveling Together**

It is impossible to foresee and describe all special travel needs and arrangements that will arise for officers and other key personnel. Subsequently, guidelines for every situation are not practical. However, to reduce risk and potential critical loss, it is recommended to avoid planning or creating travel plans that place large employee groups together in a single aircraft.

Any exceptions to the following will require the advanced approval of the Company’s President & Chief Executive Officer (CEO):

- No more than 4 ELT members may travel together.
- No more than 2 of the following may travel together: President and CEO, Chief Financial Officer, SVP Corporate Secretary & Chief Legal Officer.

**4.0 GROUND TRANSPORTATION**

The most economical mode of transportation should be used when traveling consistent with Company safety standards. Employees traveling to the same location should share ground transportation whenever possible.

Use of ride-sharing services such as Uber and Lyft are not recommended but are reimbursable. These services are not permitted in high-risk locations where travelers should only use transport organized by local hosts, their designated travel agency, or trusted sources. At the time travel is booked, Travel Services will send email alerts to the employee when travel is booked in high-risk areas.

**4.1 Rental Car**

A rental car may be used when other means of transportation are unavailable, more costly or impractical. Consider the additional cost associated with parking a rental car.

The recommended category of rental car is an intermediate/mid-size vehicle, or smaller, unless several employees are traveling together and renting a larger car would avoid additional car rentals or

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if you are transporting a large quantity of Company equipment. You are responsible for complying with all motor vehicle laws and regulations while using a rental car on Company business. Insurance provisions are voided if you do not adhere to these laws. In addition, the employee will be responsible for the payment of any fines or tickets and may face disciplinary action for violating such laws or regulations.

Car rental companies will at times offer special promotional rates that are less costly. Please note that these reduced rates typically do not meet the minimum insurance amounts deemed necessary by Hillrom’s Risk Management group. Improved insurance benefits have been negotiated into our contracts for most locations. At the time of rental, the car should be inspected, and any damage found should be noted on the contract before the vehicle is accepted.

The Company has negotiated preferred rates with these car rental companies:

<b>Location</b>	<b>Vendor Status</b>	<b>Vendor</b>
United States, Canada and Mexico	Preferred	1 <sup>st</sup> : Avis; 2 <sup>nd</sup> : Budget
	Alternate	Enterprise / National
Europe	Preferred	1 <sup>st</sup> : Avis; 2 <sup>nd</sup> : Budget
	Alternate	Enterprise / National
Australia/Asia Pacific	Preferred	1 <sup>st</sup> : Avis; 2 <sup>nd</sup> : Budget
	Alternate	Enterprise / National

If the region in which you are renting a car is not noted above, please ensure that you rent from reputable car rental companies and that car rental insurance meets the requirements set forth in this policy.

Rental cars should be returned with a full tank of gas/petrol as rental car companies charge a premium for refueling. Decline any vehicle type upgrade if there is a cost involved.

**Do Not Drive While Impaired.** Driving while cognitively impaired is prohibited. Impaired is defined as having your ability to think or react affected in any way by alcohol, drugs, medication, fatigue, injury or illness.

Employees driving under the influence of alcohol or illicit drugs may be subject to termination and may be ineligible for insurance benefits in the event of an accident.

**4.2 Rental Car Insurance – All Employees (Worldwide) renting in the United States**

The preferred rental car companies supply the Collision/Loss Damage Waiver free of charge at participating locations in the continental United States, Alaska and Hawaii. Therefore, neither Hillrom nor the employee is responsible for physical damage to the car if the employee complies with the terms of the rental agreement. The Hillrom Corporate ID must be on the rental agreement for the insurance to apply and is applicable to employee business rentals only. Family members are not included in this insurance coverage.

Currently, under our corporate rental car agreements, the rental car companies provide insurance limits of up to \$100,000 per person or \$300,000 per accident for bodily injury or death and up to \$25,000 for property damage. Otherwise, they and other rental car companies only provide the minimum required state statutory limits.

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There is no business reason to purchase the other optional insurance coverage offered by the rental car companies. Any such purchases are at the employee’s own expense and will not be reimbursed. The following coverages should be declined:

- Collision / Loss Damage Waiver (CDW / LDW)
- Personal Accident Insurance (PAI)
- Liability Insurance Supplement (LIS)
- Personal Effects Insurance (PEI)

When renting a car from a rental car company other than a preferred rental car company the Collision/Loss Damage Waiver and Liability Insurance Supplement should be declined, since the Company is self-insured. If an employee suffers a physical damage loss to the vehicle and is at fault, the employee should put the cost for the ensuing damage on their expense report and charge it to their department. The primary liability coverage is provided by the rental car company at required state statutory limits. Hillrom’s auto liability policy in the United States provides excess coverage (above a large deductible) if the primary coverage proves to be inadequate. Personal Accident Insurance and Personal Effects Insurance may only be purchased at the employee’s own expense.

**4.3 Rental Car Insurance – Non-U.S. Citizens renting outside of the United States**

When renting a car within your native country, decline the Collision/Loss Damage Waiver and Liability Insurance Supplement. Decline any separate vehicle theft and fire protection offered. Purchase minimum required primary liability insurance limits if not included automatically within the rental contract. It is not necessary to purchase additional supplemental auto liability. Consult your local Marsh insurance broker for auto insurance coverage questions.

When renting a car outside of your native country, it is recommended that you accept the minimum Collision/Loss Damage Waiver insurance offered. Purchase minimum required primary liability insurance if it is not automatically included within the rental contract. It is not necessary to purchase additional supplemental auto liability limits. However, if separate vehicle theft protection coverage is offered, it should be purchased. Personal Accident Insurance and Personal Effects Insurance may only be purchased at the employee’s own expense.

**4.4 Rental Car Insurance – U.S. Citizens renting outside the United States**

You should accept the Collision/Loss Damage Waiver and purchase minimum required liability limits if they are not included automatically within the rental contract. It is not necessary to purchase additional supplemental auto liability limits. If separate vehicle theft protection coverage is offered, it should also be purchased. Personal Accident Insurance and Personal Effects Insurance may only be purchased at the employee’s own expense.

Rental cars in Europe and some other areas of the world may already include insurance in the cost of the rental agreement. Your travel agency should provide details.

**4.5 Rental Car Insurance – Spouse Traveling with the Employee**

When renting a car for business, a spouse should not drive the rental vehicle since they are not an authorized driver.

When a spouse rents a car for a relocation trip only, or when an employee is renting one with the intent that his/her spouse will drive the vehicle, the collision damage waiver and supplemental liability



insurance should be purchased. In the case of relocation only, this cost would be a reimbursable expense as the coverage features provided by the preferred rental car companies do not apply to non-employees.

#### 4.6 Rental Car Insurance – Compromised or Voided

Rental car insurance can be compromised or voided. Some possible reasons why are:

- Unauthorized driver, such as a spouse, other family member or other non-employee.
- Car is not being driven for “business purposes”.
- Driver under the influence of a substance known to impair driving ability.
- Used for an illegal purpose.
- Driving in any abusive or reckless manner or if convicted of careless driving.
- Driving on undeveloped roads.
- Leaving the vehicle and failing to remove the keys and the vehicle is stolen.
- Removal of the vehicle from one country into another not permitted by the rental agreement (e.g. from the United States into Mexico).

Make sure that you are familiar with all actions that might compromise rental car insurance and do not engage in any activity that could result in insurance coverage being denied.

#### 4.7 Authorized Driver

An authorized driver is typically:

- A renting employee who is 21 years of age or older in the United States and Canada, and 18 years of age or older in Europe.
- A fellow employee who drives the vehicle for business purposes (in the United States, only when renting with preferred rental car companies).
- The minimum age to rent a vehicle varies by country and by rental car company. For areas outside the United States, Canada and Europe, please check with the rental car company for details.

#### 4.8 Rental Car Accident

Rental cars may be shared among fellow employees when renting with preferred rental car companies only; however, the person who rented the car is responsible for the vehicle and is the point of contact to finalize all claims made against the vehicle (regardless of who was driving) should there be an accident. In the event a rental car accident occurs, travelers should immediately contact:

- Local authorities, as required
- The rental car company

The Hillrom Risk Management department should be contacted only when problems are encountered during settlement with the rental car company regarding an accident.

#### 4.9 Personal Vehicle Usage

Employees may use their personal vehicle for business trips if it is more economical and/or timely as compared to flying, renting a car, taking a taxi or alternative transportation.

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It is the personal responsibility of the owner of a vehicle being used for business to carry adequate insurance coverage for their protection and for the protection of any passengers. The insurance company of the owner of the vehicle has primary responsibility for any bodily injury or property damage claims, not the Company's insurance. It is the responsibility of the employee to ensure they hold a valid driver's license, secure and maintain automobile liability, property damage, personal property, or any other applicable insurance at their own cost. In addition, any fines or fees issued with tickets, parking violations or any other motor vehicle infractions will be the responsibility of the vehicle owner.

Safety should be the first priority while driving for Company business. Employees should wear safety belts, follow all posted signs and speed limits, not eat while driving, and take sufficient breaks when driving for extended periods of time. Additionally, Hillrom does not permit the use of Microsoft Surfaces, iPads, laptops, etc. while driving. The use of mobile phones is permitted using a hands-free mechanism and where permitted by law. You should consider stopping the vehicle in a safe area before operating any of these types of equipment. Local laws may prohibit or limit the use of these devices while driving. It is the driver's responsibility to be aware of these requirements.

Loss of personal property or property of others is not covered by the Company. Consequently, we recommend that you take every precaution to make sure your vehicle is locked at all times and that valuables are kept locked in the trunk or out of sight. Stolen personal property can normally be covered under a personal renters or homeowner's insurance policy and thus, the employee may wish to purchase additional coverage for this type of situation at their own cost.

Travelers will be reimbursed for business usage of personal cars at a Hillrom established fixed rate which will not exceed the rate allowable under local guidelines and which will be adjusted periodically.

Domestic U.S. travelers will be reimbursed for business usage of personal cars at a Hillrom established fixed rate which will not exceed the rate allowable under the Internal Revenue Service (IRS) guidelines and which will be adjusted periodically. Employees who itemize may be able to deduct the difference between the IRS standard rate and the Company's reimbursement rate from their personal income tax, assuming the Company's reimbursement rate is less than the IRS rate. It's the employee's responsibility to track business mileage for potential deductions for their personal income tax return. Employees are encouraged to contact a tax advisor for the appropriate guidance.

The mileage reimbursement rate is presumed to cover the costs of an economical vehicle operation including but not limited to fuel, car washes, and routine maintenance. Employees will not be reimbursed for any repairs or routine maintenance to their personal car even if these costs result from business travel. If any employee is involved in an accident while driving a personal vehicle, the Company will not pay the collision or comprehensive deductible.

Travel between Company facilities (within cities/towns, such as between Batesville facilities) will not be reimbursed, unless included in employment contract. Travel between regional Company offices is reimbursed (e.g. travel between the Cary, NC and Charleston, SC offices).

To be reimbursed for use of their personal car for business, travelers must record the distance – either in miles or kilometers – daily utilizing the software recommended by their global business unit. If using Concur, the use of the distance calculator is strongly recommended. If for some reason the use of this calculator does not provide an accurate accounting of the actual distance travelled, you must provide a daily mileage log that is to be attached to the expense line as support for the

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reimbursement. Record the exact route, total distance and business purpose for each daily trip. A mileage log may be found at the following link: [Mileage Log](#)

The distance that you report must be exact and not rounded to the nearest 5 or 10 miles or kilometers. When driving between your home and a location other than your normal work location, you must deduct the distance you typically commute on a workday. For example, a person drives 30 miles to/from work daily...the drive to/from the airport is 100 miles...you can claim only the net differential of 70 miles. This would apply for travel on your standard workdays (typically Monday – Friday).

If an employee, for convenience, chooses to use a personal vehicle instead of the recommended form of transportation (such as a flight,) the traveler will be reimbursed for the lesser of the two amounts (e.g. airline ticket - \$325 and mileage reimbursement - \$400, employee can submit mileage up to \$325). This evaluation should be documented and submitted as part of the traveler's expense report.

**5.0 PARKING**

**5.1 Airport Parking**

All travelers should look for the most economical facilities in their area. Employees driving to the airport should use off-site facilities or long-term lots rather than parking at the airport terminal.

**5.2 Valet or Self-Parking**

All travelers should self-park their vehicles whenever possible.

**6.0 RAIL TRAVEL**

**6.1 Class of Service**

Rail Travel should be used when it is less expensive or timelier than air travel or when it is timelier than driving. U.S. rail travel should be booked in coach class. Outside the United States reserved/comfort class seating may be utilized. Sleeper units may be confirmed in lieu of air and hotel, when costs are comparable.

**7.0 LODGING**

**7.1 Hotel Selection Guidelines – Batesville Travel**

Employees travelling to Batesville are required to utilize Jawacdah Farm when available as this is a Company-owned facility.

**7.2 Hotel Selection Guidelines – Other Travel**

The Company standard for hotels is the Basic or Moderate Category or where the Company has negotiated preferred/contracted rates. If a negotiated supplier or rate is not available, work with the travel agency to select facilities that are of a similar level. At check-in you should always ask for the lowest room rates that might be available (e.g. promotional rates, customer/hospital negotiated rate, any automobile club, etc.). (Please note: any automobile club discount requested would require use of your personal membership).

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Lodging found on home sharing services such as Airbnb and VRBO are nearly impossible to vet for background and personal security matters and do not have the security components available in established hotels. Home sharing services are not permitted as a lodging option for business travel as it does not meet insurance and safety requirements.

No payment or equivalent is provided for travelers opting to stay with family or friends.

<b>Traveler Needs</b>	<b>Type of Hotels</b>
Basic accommodations	Ibis, Days Inn, Red Roof Inn, Comfort Inn, LaQuinta, Quality Inn, Tru by Hilton, Hotel F1, Motel One
Moderate accommodations	Courtyard by Marriott, Hampton Inn, Fairfield Inn, Best Western (outside North America), Holiday Inn Express, Residence Inn, TownePlace, SpringHill, Hyatt Place, Holiday Inn, Radisson, Mercure, Novotel, Hilton Garden Inn, Aloft, Element, Moxy, Homewood Suites, Home2 Suites
Full-Service accommodations	Marriott, Renaissance, Crowne Plaza, Westin, Hyatt, Hilton, Golden Tulip, Park Plaza, Sheraton, DoubleTree, Embassy Suites

Full-service hotels are permitted when they are cost competitive as compared to moderate or basic accommodations or when they are the only choice available due to location or room availability. Documentation evidencing this must be attached to the expense report. Luxury hotels are not acceptable unless special rates are obtained in conjunction with employee attendance at a seminar, conference, etc. Documentation evidencing the event requiring the stay at the luxury hotel must be attached to the expense report. This includes, but is not limited to, the following type properties:

Ritz Carlton	Fairmont	Four Seasons
JW Marriott	Kimpton	Shangri la
InterContinental	Grand Mercure	Pan Pacific
W Hotels	Sofitel	Loews

**7.3 Hotel Cancellation Procedures**

Travelers are responsible for canceling hotel rooms and must contact their travel agency or the hotel directly. Travelers will be held responsible and will not be reimbursed for no-show charges unless there is sufficient proof that the billing is in error or in case of emergency or circumstances beyond the employee’s control. Travelers should request and record the cancellation number in case of billing disputes. Travelers should note that cancellation deadlines are based on the local time of the property and vary by location and vendor.

**8.0 MEETINGS AND EVENTS**

**8.1 Scope**

The Global Meeting Services Team at Hillrom enables the Company to ensure consistency and compliance with laws and regulations with respect to meetings and events, as well as leverage spend

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across the Company to optimize resources on a global basis. The Company's Global Meeting Services team can be reached at: [meeting.services@hillrom.com](mailto:meeting.services@hillrom.com), via phone at +1-812-931-3560, or on the Hillrom Travel website at: [Meeting Services](#)

Hillrom organized meetings or events held in a facility or location that is not owned or operated by Hillrom fall within this scope of this policy. This includes meetings that are held in person, virtually or a combination of in person and virtual. Additionally, meetings or events with an HCP that are held at a facility or location that is not owned or operated by the HCP fall within this scope. This includes, but is not limited to, the following:

Management meetings	Training meetings, Team Building Events
Professional meetings	New product introductions
Technical meetings	Incentive trips
Sales meetings (national, divisional, area, etc.)	Hospitality events (receptions, banquets, etc.)
HCP events– including Customer focus groups / Advisory Boards / HCP meals at a restaurant with 10 or more participants, etc.	

NOTE: **“Spend”** as referenced below refers to the projected total cost of the meeting or event, inclusive of flights, rail, car, hotel, venue, meals, entertainment, audio-visual, etc.

NOTE: **“Meeting Owner/Sponsor”** is defined as the person requesting a meeting/event or the person asked to coordinate the details of a meeting/event at the local level. This might be an administrative support person, Country/General Manager, Area/Regional Sales Director, marketing/product manager, etc.

**8.2 Management of Events – United States and Canada**

Meetings and Events in the United States and Canada that meet any of the following criteria must be managed through the Company's Global Meeting Services team:

- 10 or more attendees in person, virtual, or a combination of in person and virtual
- Spend more than \$5,000
- Contract(s) required

**8.3 Management of Events – Outside the United States and Canada**

Based on the expected/approved Spend, the following chart identifies the engagement required with Global Meeting Services and/or Sourcing for events to be conducted outside the United States and Canada:

<b>Spend Threshold</b>	<b>Use of Meeting Services</b>	<b>Event Management</b>	<b>Contract Review by Sourcing</b>
Spend between \$5,000 and \$25,000	Register	Local Meeting Owner	Optional
Spend between \$25,000 and \$100,000	Register	Local Meeting Owner	Required
Spend greater than \$100,000	Utilize	Meeting Services	Required

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To register, click on this link and complete the short questionnaire: [Register Your Meeting](#)

**8.4 Location Guidelines**

- Destination and facility will be determined by Global Meeting Services based on overall value to the Company.
- Meetings should be held at Company facilities, if appropriate and when available.
- In the United States, Jawacdah Farm should be used when the cost of the event, including travel, is less than an external facility.
- Meetings and events should be held at a site that minimizes travel and overnight stays.
- For events at an external facility, consideration will first be given to external facilities where the Company has a financial obligation from a previously cancelled program, or where a preferred vendor relationship exists.

**8.5 Financial Budget Approval**

Meetings incurring total estimated spend as noted below are required to have a Budget Authorization form ([Budget Authorization Form](#)) completed prior to any contracts being signed, whether the contract is signed by Meeting Services, Indirect Sourcing, or the Meeting Owner/Sponsor. These authorizations ensure the funds are approved for the meeting.

<b>Spend</b>	<b>USD</b>	<b>Signature(s) required:</b>
Over	5,000	Employee with Budget authority for the total spend
Over	10,000	Add Finance Lead signature to above
Over	25,000	Add Supervisor / Country Manager to above
Over	100,000	Add ELT approval to above

At the discretion of the Global Meeting Services Team, certain significant group functions such as Companywide sales meetings, incentive trips, and/or other large meetings may also require the approval of the CEO and/or CFO.

A Corporate Meetings Card will be used by Global Meeting Services when possible for charging expenses. Direct bills should be established and coordinated with Meeting Services only when other forms of payment are not accepted.

**8.6 Contract Signatures**

All facility and vendor contracts must be signed by an employee who has Contract Signature Authority. Please refer to Hillrom’s Transaction Signing Authority policy on Hillrom Connect at the following link: [TRANSACTION SIGNING AUTHORITY](#)

**8.7 Bonus Points / Incentives**

When utilizing hotels (or other vendors) that provide bonus points or incentives for meetings and events, the points will be accumulated at the corporate level and donated to charity. Personal receipt/use of these points, tickets, credits, or other awards is not permitted and must be declined.



### 8.8 Spouse / Companion Travel to Meetings and Events

The Company does not permit spouse/companion travel to Company-sponsored meetings and will not reimburse travel and event expenses incurred by a spouse or other individual accompanying an employee on business unless –approved in advance by your ELT member. See also Section 2.10 of this policy. Where attendance is permitted, the guest must be at least 21 years of age.

Any reimbursable spouse/companion travel must be approved in advance by your ELT member with the business purpose clearly stated. All reimbursed expenses incurred for spouse/companion travel will be fully taxable to the employee (in countries where applicable).

### 8.9 Meetings with Health Care Providers

Hillrom defines Health Care Providers (or HCPs) as any individuals or entities which (1) are involved in the provision of health care services or items to patients; and (2) purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe Hillrom's products. The term 'Health Care Providers' includes both persons providing services and persons who do not provide services directly but who are involved in the decision to purchase, lease or recommend Hillrom products.

There are strict guidelines regarding meetings with HCPs. Meetings include, for example, customer visits to a Customer Experience Center, advisory boards, focus groups, reference site visits, Company-sponsored product training programs, and Company-sponsored general education programs.

All meetings with HCPs must adhere strictly to the requirements set forth in the Global Policy on Interactions with Health Care Providers that can be found by clicking the following link: [Global Policy on Interactions with Health Care Providers](#) and any corresponding Country/State/Local Law Supplement(s).

You can find additional information for each country by clicking on the map at this link: [Global IHCP Dashboard](#). If you have any questions, please consult the Legal Department or Global Compliance Office at: [GlobalComplianceOffice@hillrom.com](mailto:GlobalComplianceOffice@hillrom.com)

## 9.0 MEALS

### 9.1 Documentation/Receipt/Approval Requirements

Travel Card receipts and original itemized receipts are required for any meals with a cost over \$25, including meals at a hotel. However, if local laws and regulations require receipts for amounts below \$25, receipts must be provided accordingly. Except for meals provided to Health Care Providers, employees are not required to submit receipts for expenses with a cost under \$25 when charged to your Travel Card. See Section 10.3 of this Policy regarding required documentation on meals with HCPs. All expenses for meals made on behalf of or provided to HCPs, including all meals, require an itemized receipt and must be reported in the HCP field in Concur (if that field is available).

Meals paid by cash require an original itemized receipt (no restaurant tear tabs) for ALL expenses regardless of the amount. Expenses submitted without receipts (lost or missing) as required by this policy, will require a signed affidavit by the employee in Concur.



For all business meals, employees will be reimbursed for business meal expenses according to actual and reasonable cost. Business meal expenses require the following documentation included in the expense report:

- Names of individuals present, their titles and company name, including employee name
- Name and location of where the meal or event took place
- Exact amount and date of the expense
- Specific business topic(s) discussed

## 9.2 Employee Travel Meals

Employee Travel Meals (personal meals) are defined as meal expenses incurred by the traveler when dining individually on an out-of-town business trip. These meals must be recorded on the expense report as Employee Meals (No Attendees). Travelers will be reimbursed for actual meal expenses, inclusive of tax and tip, up to a daily maximum of \$75. For travel in the following metropolitan areas, travelers will be reimbursed for actual meal expenses, inclusive of tax and tip, up to a daily maximum of \$100: New York City, Washington D.C., Chicago, Los Angeles, London, Paris, Amsterdam, Zurich and Tokyo.

Personal beverages/snacks consumed during an out-of-town business trip are permitted to be reimbursed subject to guidelines/limits noted above. These expenses should be coded under the Employee Meal expense type.

## 9.3 Meal Per Diem Allowance

Per diem allowances are permitted only where they are required under a local union or works council agreement and only for those employees covered by such an agreement. Per diem reimbursements are based on departure and return times over the entire 24-hour day and are to be prorated accordingly.

If a meal is provided through the hotel, conference, event or replaced by a legitimate business meal, the per diem allowance for that meal shall not be claimed. Per diem allowances include the cost of the meal, beverages, tax and tip. Receipts are not required for per diem allowances. Per diem allowances are reimbursed after the trip is completed.

## 9.4 Business Meals with Other Employees

You should not entertain or be entertained by other Hillrom employees. Employees will be reimbursed for business-related meals taken with other employees only in the following circumstances:

- When a HCP or other customer is present (Subject to The Global Policy on Interactions with Health Care Providers) or
- When at least one Company employee is from out of town or when traveling out of town together, or
- When for confidentiality reasons, business must be conducted off Company premises, or
- When, due to schedules or efficiency purposes, a working meal is required to meet project goals

The most senior level employee must pay and submit the bill for reimbursement. Meal expenses should be paid using the employee's Travel Card unless it is not accepted.

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The cost of business meals with other employees should not exceed the daily maximums set forth in Section 9.2 of this policy. These maximums apply to each Hillrom employee attending a business-related meal with other Hillrom employees.

**9.5 Business Meals with Health Care Providers**

Employees may, on occasion, provide modest meals and refreshments as a business courtesy to HCPs when such meal is incidental to a legitimate presentation of scientific, educational or business information. Meals should only be provided in a modest venue and setting conducive to the exchange of information and only to HCPs who attends the activity. Recreational and entertainment venues are prohibited.

**Business Meals with U.S. HCPs:** Meals provided by Hillrom to U.S. HCPs must be limited to the per-person meal limit (which includes the cost of food, beverage, tax and gratuity) as follows:

<b>Meal</b>	<b>Meal Limit</b>
Breakfast	\$50/person
Lunch	\$50/person
Dinner	\$100/person in all locations or cities except the following where the limit is increased to \$135/person:  New York City, Washington D.C., Los Angeles, Chicago, Boston, San Francisco and Miami

The meal must be modest and reasonable in accordance with local standards, which may depend on the time of day, venue/setting of the meal, and geographic location.

**Business Meals with HCPs Outside of the U.S.:** Meals provided by Hillrom to HCPs outside the U.S. must be limited to a maximum of \$100/person. The meal must be modest and reasonable in accordance with local standards, which may depend on the time of day, venue/setting of the meal, and geographic location.

If local law, industry code, or affiliate policy provides a lower limit on meals, you must comply with that limit instead of the limits set forth above. Please review the Country Guidebooks available at the Global IHCP Dashboard for additional guidance and clarification on HCP meals in a particular country or region.

Meals above the limits stated above require GCO approval. Such approval should be documented in writing (e.g. email) and submitted as part of the employee’s expense report.

**9.6 Business Meals with Other Business Partners**

When appropriate, business meals can play an important role in fostering working relationships and building teamwork. Hillrom employees may provide a business meal to suppliers, vendors, consultants or other business partners, provided that those meals:

- occur on an infrequent basis,
- are related to a legitimate business purpose,
- are modest in value and cannot be perceived as excessive,

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- do not create the appearance that the parties are entitled to preferential treatment or an award of business,
- occur at a business appropriate venue, and
- the appropriate precautions are taken to provide security if sensitive information will be discussed.

**9.7 Business Meals with U.S. Government Officials or Employees**

Employees are strictly prohibited from providing meals to U.S. Government officials or employees or their immediate families, except as outlined in the Selling to U.S. Government Policy, located on Hillrom Connect at the following link: [Selling to the U.S. Government Policy](#)

**9.8 Business Meals with Government Officials or Employees Outside the United States**

Where permitted by local law, applicable industry code, and the internal rules of the recipient’s employer, Hillrom may provide modest, infrequent, reasonable business meals to non-Health Care Provider government officials or employees in connection with a legitimate business purpose. Unless local law provides otherwise, any meals to non-Health Care Provider government officials or employees above the per person thresholds set forth in Section 9.5 (which includes the cost of food, beverage, tax and gratuity) must be approved in advance by the Global Compliance Office. Additional guidance can be found in the Global Anti-Corruption Policy at the following link: [Global Anti-Corruption Policy](#) or by contacting the Global Compliance Office at [GlobalComplianceOffice@hillrom.com](mailto:GlobalComplianceOffice@hillrom.com).

**9.9 Alcohol Purchases (Employee only or with Other Employees)**

Alcohol purchases are only permitted in moderation and only when consumed in conjunction with a meal. Alcoholic beverages are included in the referenced daily or meal limit.

**9.10 Tipping for Meals**

Tips of 10 – 20 % of the bill, depending upon what is local customary practice, included on meal receipts will be reimbursed. Be aware the tip or service charge may be automatically added into the bill. Tips are included in the daily limits mentioned under Sections 9.2 and 9.5, and per diem allowances under Section 9.3.

**10.0 HEALTH CARE PROVIDERS – EXPENDITURES AND TRANSPARENCY REPORTING REQUIREMENTS**

**10.1 Interactions with Health Care Providers and Associated Expenses**

There are strict guidelines regarding Hillrom’s interactions with HCPs. Potential types of interactions may include, but are not limited to, meals, travel, meetings, Customer Experience Center visits, consulting relationships, research relationships, or funding support in the form of a charitable contribution, medical education grant or sponsorship. This Policy does not solely govern the types of activities and expenses that may be permissible regarding HCPs. Instead, the Global Compliance Office has established guidance for each of these interactions, found in the Global Policy on Interactions with Health Care Providers, the U.S. State Law Supplement to the Global Policy on Interactions with Health Care Providers as well as the associated international IHCP Country Guidebooks located on the Global IHCP Map located on Hillrom Connect at: [Global IHCP Dashboard](#). All interactions with Health Care Providers must adhere strictly to the requirements set forth in the

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Global Policy on Interactions with Health Care Providers and any corresponding Country/State/Local Law Supplement(s). If you have any questions, please consult the Global Compliance Office.

**10.2 Health Care Providers Expense Documentation**

All expenses related to interactions with Health Care Providers must:

- Be submitted within 30 days after the expense was incurred.
- List the names of all participating HCPs, including non-doctors (e.g., nurses, office staff) in Concur.
- Include Sign-In Sheet for meals with three or more HCPs. The list of participating HCPs in Concur must match the list of HCPs on the Sign-In sheet.
- Include an itemized receipt.
- Include documentation that identifies the business purpose of the expenditure.
- Identify the Product Group and Product Group Subtype associated with the expenditure.

Insufficiently documented or detailed expenses, or failure to timely submit expense reports may result in the expense being deemed as ineligible for reimbursement and may result in disciplinary action.

**10.3 U.S. Health Care Provider Transparency Reporting Requirements**

As a medical device manufacturer, Hillrom is required to comply with certain Federal and State transparency reporting laws and regulations that require reporting of certain payments or other transfers of value provided to U.S. HCPs. Since the definition of a HCP and reporting requirements vary under each law, and the requirements to track and report are broad, we must track and collect all information relating to payments and transfers of value given to all HCPs. Additional guidance on managing U.S. Health Care Provider Transparency Reporting Requirements can be found in the U.S. Sunshine Act and State Transparency Reporting Standard Operating Procedure, that can be found at the following link: [US Sunshine Act and State Transparency Reporting Policy](#) and the U.S. State Law Supplement to the Global Policy on Interactions with Health Care Providers, that can be found at the following link: [U.S State Law Supplement to Interactions with Health Care Providers](#).

**10.4 U.S. Health Care Provider Sign-In Sheet**

In order to ensure that we are able to appropriately collect and report payments made to larger groups of HCPs, the HCP Sign In Sheet is required to be submitted with the corresponding expense report when more than three health care providers participate in a meal or refreshment. The HCP Sign-in Sheet is available at the following link: [HCP Sign-In Sheet](#)

Please ensure that all applicable fields are completed on the HCP Sign-in Sheet (HCP name, practitioner type and specialty, hospital/company name, business address, state(s) of licensure and license number(s)).

**10.5 U.S. Health Care Provider Expenses Not Managed Through Concur**

Sections 10.7, 10.8, and 10.9 of this Policy describe the process for documenting HCP expenses in Concur. Employees managing U.S. Health Care Provider expenses that are not submitted through Concur are responsible for working with the applicable finance business partner to determine the appropriate way to identify and document HCP expenses aligned with the requirements noted in Sections 10.7, 10.8 and 10.9.

**10.6 U.S. Doctors/Physicians Expense Documentation in Concur**

When managing expenses related to U.S. doctors/physicians, employees must select all doctors from a pre-loaded list in Concur, or if not available, manually add a doctor as an individual attendee in Concur. “Doctor” means an individual holding an active license (regardless of whether he or she is actually practicing) in the United States as a medical doctor, doctor of osteopathy, dentist, dental surgeon, chiropractor, optometrist, or podiatrist. The doctor record loaded into Concur will include all required information for reporting expenditures required under the U.S. Federal Physician Payment Sunshine Act. If you are using a preloaded list of doctors and cannot find a doctor listed in Concur, employees must complete the Doctor Add Form and submit the form to [HCPMailbox@hillrom.com](mailto:HCPMailbox@hillrom.com). The Doctor-Physicians Add Form can be found at the following link: [Doctor-Physicians Add Form](#)

**10.7 Non-Doctor Health Care Providers Expense Documentation in Concur**

For all other HCPs, employees must list each of the individual HCPs receiving the meal or other expenditure along with the following details for each individual:

- First and Last Name
- Title or Specialty
- Facility or Practice Group Affiliation
- City
- State of Licensure or Employment

**10.8 Connecticut, Vermont & Massachusetts Non-Doctor/Physician Expense Documentation**

These states have enacted laws with restrictions on meals or other items provided to HCPs. For HCPs who are not doctors/physicians (e.g., nurses, respiratory therapists, etc.) licensed in Connecticut, Massachusetts or Vermont, employees must include the HCP's state license number in the entry field on the expense report. You are responsible for understanding the specific guidelines as they relate to the states in your territory, as established in the Global Policy on Interactions with Health Care Providers and the corresponding U.S. State Law Supplement to the Global Policy on Interactions with Health Care Providers located on Hillrom Connect at the following link: [U.S. State Law Supplement to Interactions with Health Care Providers](#)

Massachusetts Expenditure and Disclosure Form: Massachusetts requires Hillrom to submit specific information about transfers of value given to Massachusetts based HCPs. To ensure we comply with such requirements, the Massachusetts Expenditure and Disclosure Form must be submitted to the Hillrom Transparency Compliance Team within five (5) days after an event or instance where you provide a Massachusetts Health Care Provider with food, travel, lodging, consulting fees, educational items, or any other economic benefits. When complete, please email the form to [HCPMailbox@hillrom.com](mailto:HCPMailbox@hillrom.com). This form can be found by clicking the following link: [MA Medical Device Expenditure and Disclosure Form](#)

**10.9 Changes in and New Health Care Provider Transparency Reporting Requirements and Transparency Laws Outside the United States**

There are a growing number of local, state and international jurisdictions implementing modifications to existing transparency reporting requirements or instituting new transparency reporting requirements for expenditures or other transfers of value made to HCPs and HCP related organizations. Consult the Global Compliance Office or the associated International IHCP Country

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Guidebooks to determine if there is an HCP transparency reporting requirement in a particular jurisdiction and how to manage that documentation to ensure compliance with those requirements.

**10.10 Questions or Clarifications**

For questions about how to submit an expense report in Concur involving a HCP, please contact HCPMailbox@hillrom.com. For questions related to what types of expenses involving HCPs are permissible and what the applicable transparency reporting requirements may be, contact the Global Compliance Office.

**11.0 PAYMENT METHODS & PROCEDURES**

**11.1 Travel Card**

Please see Section 2.2 of this policy regarding the Company's designated Travel Card program.

**11.2 Receipts**

Original itemized receipts are required for any expense paid in cash regardless of cost. Expenses \$25 and under which are charged to your Travel Card do not require receipts, except for all expenses made on behalf of, or for Health Care Providers. All expenses made on behalf of or for Health Care Providers require an itemized receipt. A detailed business explanation of the purchase must be provided. Travel Card receipts and original itemized receipts are required for any expense over \$25. Expenses without receipts (bellman and other gratuities, tolls and metered parking) must be itemized and documented on the expense report.

Expenses submitted without receipts (lost or missing) as required by the policy, will require a signed affidavit by the employee in Concur. Some countries may require receipts on all spend to reclaim Value Added Taxes (VAT). This should be infrequent in occurrence and employees with repeated use of affidavits may be subject to disciplinary action.

**11.3 Expense Reporting**

Expense reports are to be submitted within 30 days of when a charge is made on your Travel Card, or the last date of travel, whichever is earlier. Expenses submitted beyond this 30-day period are subject to non-reimbursement or may require ELT or Regional President's approval. Days to submit expenses may be less than 30 days during specified times throughout the year to allow sufficient processing time for filing transparency reports with governmental agencies. Repeated failure to submit and/or approve expense reports in a timely manner may result in the suspension of the employee's Travel Card until the submission and/or approval of expense reports is brought current.

The following should be applied to those locations utilizing the Concur system for managing travel expenses:

- The purpose of your business travel, meeting and event expenses must be sufficiently described in Concur so that an independent reviewer of the expense report can understand the reason the expenses were incurred.
- Appropriate documentation (original detailed receipt, etc.) must be scanned or emailed to the Concur Receipt Store and attached to an expense report prior to submission.
- Receipts should be scanned and attached to an expense report at the individual entry or line item level. Bulk uploads of receipts are not permitted.

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- Expenses for meals and per diems shall be itemized by meal and day.
- Hotel expenses shall be itemized to show room, tax, meals, parking, etc. by day.
- Meal attendees' names and titles are required to be documented as part of completing an expense report, including all attendees and the employee submitting the expense. This applies to both business meals and meals with HCPs.
- The specific business topics discussed must be documented as part of completing an expense report for a business meal. Expenses must be coded properly in Concur so that overall spending may be analyzed for optimizing contracts with vendors, as well as the identification of any class of expenses that must be evaluated differently for tax treatment purposes.

If your site does not use Concur, please contact your local finance leader for information regarding the system used to process travel expenses; this policy applies equally to those locations not using Concur.

**11.4 Cash Expenditures**

Cash out of pocket expenditures, not included on a Travel Card, are limited to the equivalent of \$500 per month, except for personal car mileage. Any amounts more than this may not be eligible for reimbursements.

**11.5 Manager/Supervisor Review**

Managers or supervisors are to review expense reports submitted by their employees within 14 days of submission. This allows for timely reimbursement to the employee for any out-of-pocket expenses and expense recognition in the Company book of records. It also supports timely transparency law reporting with governmental agencies.

Detailed review by the employee's manager or supervisor is required to ensure Company funds are being spent appropriately to prevent reimbursement of expenses that are not appropriately documented, are personal in nature or are not allowed under this policy. Managers/supervisors are responsible for:

- Reviewing each receipt to validate the business expense and purpose.
- Ensuring there are no duplicate expenses.
- Ensuring receipts are attached as required or an affidavit is included or attached to the report.
- Reviewing for itemizations of all expenses, including all meals.
- Reviewing attendees for business meals and health care providers.
- Reviewing that meals with health care providers are coded as such.
- Confirming through their approval, that all expenses being submitted are valid business expenses according to this policy.

Failure to adequately review an employee's expense report may result in a rejection of the report until a sufficient review is performed. Sustained failure to adequately review employee expense reports may result in disciplinary action.

**11.6 Independent Review of Expense Reports**

All expense reports submitted are subject to review, including continuous monitoring and audit for compliance with this policy. That includes, but may not be limited to, the propriety of the expenditures, adequate and supporting documentation, and supervisor review. Results of expense report reviews and audits may be periodically submitted to the ELT and Corporate Finance for review.

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**CORPORATE POLICY**

**GLOBAL TRAVEL, MEETING AND EXPENSE POLICY – No. 1016**

Failure to comply with this policy may subject involved employees, including approving managers, to corrective action up to, and including termination of employment, travel card suspension, and/or disciplinary action.

**12.0 MISCELLANEOUS TRAVEL EXPENSES**

**12.1 Internet Connections**

Hotel internet connection charges while traveling on business are reimbursable expenses. Internet charges should be detailed on the hotel folio and itemized on the expense report. Travelers are required to utilize complimentary internet connections when available. Internet connections during flight may be reimbursed for flight segments greater than six (6) hours in duration.

**12.2 Health Club Fitness Facilities**

Employees are encouraged to maintain their fitness regimen when traveling on Company business away from home. Where available, employees should use the complimentary fitness center available in the hotel. Non-complimentary fitness center fees within a Company preferred hotel overnight stay will be reimbursed at the amount charged by the hotel. For overnight stays in a non-preferred hotel, employees will be reimbursed up to a maximum of \$20 per day for fitness center fees.

**12.3 Passport/Visa**

Reimbursement for the cost incurred in obtaining or renewing a passport and any necessary visas may be made for an employee who, in the regular course of his/her duties, is required to travel outside their local country, with the approval of the employee's supervisor.

**12.4 Luggage Fees**

Employees will be reimbursed for luggage charges as follows:

- One (1) checked bag for trips three (3) nights or less.
- Up to two (2) checked bags on trips four (4) nights and over.
- In excess of two (2) when traveling with equipment necessary for business; Company records or property; heavy or bulky Company materials; or as allowed in the guidelines for ExPats & Relocation.

**13.0 NON-REIMBURSABLE EXPENSES**

Any expense not directly related to business travel, meeting and event expenses are not permitted.

The following expenses are considered personal and non-reimbursable as business expenses on a purchase or rental basis. This list is not all inclusive and should be used as a guideline:

- Annual fees for personal charge or credit cards
- Automobile association dues
- Barbers and hairdressers
- Car washes for personal (or rental) cars; routine maintenance or tune-ups
- Childcare
- Clothing, unless qualified under an approved Uniform Reimbursement Policy
- Travel Card delinquency fees/finance charges

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- Expenses which are not supported by receipts as required by this policy
- Expenses related to vacation or personal days, or personal time or activities, prior, during or after a business trip
- Gifts, including Gift Cards (customer, personal). Employee gift may be permissible in certain cases (see Awards/Misc. Bonus Payment Policy & Form in the Common Links section at the following link: [Awards/Misc. Bonus Payment Policy & Form](#))
- Golf fees; country club dues
- GPS/Navigation systems (within the employees' own country)
- Helicopter services for airport transfers
- Hotel room safekeeping fees (unless holding Company property)
- Insurance: optional travel or baggage; personal accident / personal property / personal effects for car rental or other; any non-compulsory insurance coverage
- Internet (including but not limited to internet-service-providers, Hot Spots, MiFi, or other means) or telephone/fax service within the home
- Laundry services for trips less than five (5) consecutive days
- Loss/theft of personal funds or property
- Lost baggage
- Luggage, briefcases, computer bags
- Magazines, books, newspapers (for personal use)
- Membership fees or dues, or registration fees for airline clubs, frequent traveler programs, Global Entry, TSA Pre-Check, Wi-Fi subscriptions, social clubs, etc.
- Mileage within local facilities
- Mobile Device accessories
- Movies (including in-flight and hotel in-room movies)
- "No-show" charges for hotel, restaurant or car service within travelers' control
- Parking or traffic tickets; traffic fines
- Personal events including sports events
- Personal telephone calls more than one (1) per overnight stay
- Personal toiletries; medicines; shoeshine; tobacco products
- Pet care
- Satellite Radio systems
- Spa services/treatments
- Spouse/companion travel (unless approved under Section 2.10 of this policy)
- Starbucks or other loyalty card reload
- Valet Parking unless there are no alternatives

**14.0 CURRENCY CONVERSION**

For reimbursement rates in currencies other than USD, you should calculate the allowed amounts by converting the USD amount to your local currency utilizing the current year business plan rates. These rates can be found at [ANNUAL PLAN EXCHANGE RATES.](#)