



Travel and Expense Policy
Version 4 - July 2025

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Purpose and Scope

This policy establishes the guidelines and procedures regarding reasonable travel and business related expenses. This policy applies to all employees of Acquia Inc. (“Acquia” or the “Company”) and any of its legal entities or subsidiaries.

All employee incurred travel and meal related expenditures must be reasonable, necessary, and for the direct benefit of Acquia, and must be submitted for reimbursement via the company’s T&E Reimbursement Tool - Navan. Please use this [link](#) for a quick guide to submitting an expense for reimbursement using Navan.

Starting in Q3 2025, most travel related expenses must be booked through the Company’s travel agency, Navan, in order to be reimbursable. Any of the following travel related expenses not booked through Navan will not be reimbursed:

- Airfare
- Hotel - except in situations where other booking methods are mandatory such as convention room blocks, etc.
- Rental Car
- Rail/Train

A Purchase Order (PO) is required for any expenses not related to employee travel and meals and must be paid for by Accounts Payable. If the expense cannot be paid for out of AP due to the vendor only accepting payment in the form of a credit card, an Acquia issued department credit card can be used. Please refer to [Appendix A - Non-Reimbursable Expenses](#) for more detail.

Employees should limit and/or minimize travel whenever possible. Consideration should be given to alternatives such as conference calls or video conferencing whenever possible.

The objectives of this policy are:

- To offer guidance regarding expenses that are appropriate, reasonable, and necessary.
- To establish and communicate equitable fiscally responsible guidelines and processes for spending travel and meal related dollars.

Employees are subject to the [Acquia Code of Business Conduct and Ethics Standards](#) while traveling for business on behalf of Acquia.

Travel

Authorized Travel Management Company

At the time of issuing this policy, Navan is our global travel agency. Most travel arrangements for all employees globally must be made through Acquia's approved travel management company, Navan. See [Appendix B](#) for information about the agency. Employees are asked to book via the online tool or app. If additional assistance is needed for more complex travel, calls can be made to the agency for agent assistance.

As a well established global travel agency, Navan provides several benefits, including:

- Safety - centralized tracking of employee travel in event of emergency
- Centralized data - for internal reporting and pricing/rebate negotiations
- Visibility - improved workflow for managers and budget owners
- Cost - lower per-transaction cost, including a price-match guarantee¹
- User experience - trip management and support

With Navan, travel purchases will be paid directly by Acquia via credit card. This allows Acquia employees to have a more efficient travel booking experience. Personal cards will still be utilized for on-trip expenses, and can be submitted for reimbursement via Navan.

¹ Please note: Acquia has elected to not show "Basic Economy" class fares, as they do not align well with business travel purposes (cancellation terms, seat assignments, etc). When comparing prices shown on Navan to other sites, please ensure that the fare class is equivalent.

Travel and Expense Approval Matrix

Category	Approvals Required
In Policy Travel Bookings	No approval required
Out of Policy Travel Bookings	Manager Notification and Cancellation Option
In Policy Expense Reimbursement	Manager approval required
Out of Policy Expense Reimbursement	Manager approval required, will be reviewed and reported on by CFO org

Air Travel

All air travel must be booked through Navan. In order to maximize savings and flight availability, all flights should be booked at least 14 days in advance. Bookings made less than seven days prior to departure are out of policy and will prompt a notification to your direct manager. Please use your best efforts to book travel as soon as possible.

Class of Service

The lowest cost fare must be booked. The cost of the flight should be no more than 25% of the median price of the comparable flights available (as measured / monitored by Navan). Employees should not pay for seat assignments if there are free seat assignments available. If there are no free seat assignments employees should opt for the lowest cost option when choosing a seat. Employees may not choose a more expensive fare in order to book a fare that allows them to use their miles to upgrade their travel. Employees must book on the lowest cost airline and may not book on an airline to amass points.

Fare Class Exceptions

Premium economy travel is allowed on any flight/flight segment that exceeds six (6) hours of continuous flight time.

Travelers are free to upgrade flights using their personal frequent flier miles or by paying the cost difference themselves as long as no additional cost is incurred by Acquia. Employees must always book the lowest available airfare and may not choose a more expensive economy fare to qualify for a mileage upgrade, earn more points, or use fewer miles to upgrade their flight.

Travel Insurance

Acquia carries Business Travel Accident-Medical Insurance. When traveling for business the following is in effect:

Aggregate Limit of Liability – per accident	\$1,500,000
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Broad Business Trip	\$300,000
Spouse Coverage while on Business or relocation trip	\$25,000
Dependent Coverage while on Business or Relocation Trip	\$25,000
Medical Expense Accident	\$10,000

If you are involved in an incident while traveling, please contact your local HR business partner.

Acquia does not reimburse for the purchase of trip cancellation insurance. If employees have a trip canceled, they can use the airline credit on a later trip.

Frequent Flyer Programs

Employees may enroll in frequent flyer programs at their own discretion. The miles accumulated are an earned benefit to the employee and employees may use the miles for upgrades to business travel or for personal uses. Employees may not book flights on specific airlines to amass miles, or purchase more expensive fares to qualify for upgrades.

Traveling with Co-Workers

No more than two executives or the two most senior employees from any department are allowed to travel on the same flight. Alternate flight arrangements must be sourced when this occurs.

Ground Transportation

Public transportation is encouraged and should be used whenever possible. Public transportation is defined as bus, tram, or subway.

Rental Cars

Employees should rent cars only when the use of a rental car is less expensive than the use of public transportation, when business needs dictate, or in an urgent situation when other alternatives are not practicable.

- Mid-size or smaller cars must be booked if an employee is traveling alone.
- Full-size cars must be booked for up to three (3) employees. This will be routed for approval within Navan
- Other classes of vehicle can be rented for a large group of more than three (3) employees traveling together. This will be routed for approval within Navan

All employees should decline all optional insurance coverage when renting a car. Optional insurance coverage will not be reimbursed for any employee renting a vehicle. All employees are covered by an Acquia provided insurance policy while renting a car for business use. See a

copy of [Appendix C](#) for a copy of the insurance ID card. If you will be renting a car you must carry a copy of this card with you.

If an employee has an accident while in a rental car they must immediately contact traveladmin@acquia.com and legal@acquia.com for instructions on how to notify our insurer of the loss.

Optional Extras

Employees should decline all optional items when renting a car. Optional items such as insurance and fuel programs will not be reimbursed. Employees should fill up a rented vehicle prior to returning it. If they cannot, the fuel charge imposed by the rental car company will be reimbursed.

Personal Automobiles

Employees may use their personal vehicle and be reimbursed for their mileage only when it is the least expensive option. If an employee is receiving mileage reimbursement they cannot claim fuel as that expense is covered by the mileage reimbursement. Employees will be reimbursed at the rate set by the authorities in the jurisdiction where they reside.

Taxis

Taxis are an approved method of transportation when an employee is not renting a vehicle and there is no public transportation available. Taxi expenses can be reimbursed via Navan.

Uber

Acquia has a direct bill account with Uber as a convenience to employees. There is no requirement or expectation that employees will use the service. If employees use Uber the charges must be put on the centrally billed account. Any question should be directed to uberadmin@acquia.com

Taxis and Uber are for business purposes only. Employees may never bill or request reimbursement for a non-business-related ride. Commuting to and from the office, leaving the office due to illness, attending a local Acquia sponsored event or other company related social gathering, are all examples of trips that cannot be billed to Acquia or expensed. If you have questions about whether or not a ride is reimbursable or billable to Acquia contact uberadmin@acquia.com

Rail/Train

Coach or economy tickets must be purchased when traveling by rail. The only exception is Amtrak Acela service in the Northeast US. When traveling on Acela, only business class tickets may be purchased.

Hotel

All hotel stays must be booked through the travel agency, Navan. Exceptions to this could include conventions where rooms must be booked through the convention or hotel to get preferred pricing or client visits where we can use a negotiated rate at the clients preferred hotel. The Acquia standard is for a three-star hotel and a standard single room. The cost of the room should be no more than 25% of the median price of the hotels in the area for the night (as measured / monitored by Navan).

Payment via Navan: Prepay vs. Pay-at-hotel

When booked, Navan will create a virtual credit card that will be used to pay for the hotel upon checkout or upon booking, depending on the type of booking. For both types of booking, the traveler will need to present a physical personal credit card for incidentals. For pay-at-hotel payment methods, a credit card authorization (CCA) form will be provided to the hotel in advance of check-in. For any reason if there is an issue, the CCA can be resent to the hotel from the Navan app. See [link](#) for additional information

Acquia does not reimburse for movies, additional fitness center charges, or mini-bar charges with the exception of water, soft drinks, and snacks.

Meals and Entertainment

Customer or Business Development Meals

The guideline for meals shared with clients or prospective clients is no more than \$150 per person per meal. The meal should be classified as “Entertaining clients” and all attendees must be listed on the attendee list. Any business meal that falls outside this cost guideline will be sent to the department budget owner for additional review and approval. It is understood that in certain circumstances this guideline will be exceeded. For example, for a meal where an Acquia executive is attending or in special circumstances.

Team Meals

The guidelines for out of office team meals and events are:

- \$35 USD per person at lunch
- \$75 USD per person for dinner.

All out of office team meals and events will be sent to the budget owner for approval after manager approval. All team meals should be classified as a “Team events & meals” in Navan and all attendees must be listed on the attendee list. Team meals should be a rare occurrence and should not be used as a reward or incentive.

Where applicable, in-office team meals should be ordered via the office manager, and purchased through approved vendors.

Employee Meals

While employees are traveling on business, the daily meal guideline is \$125 USD or equivalent local currency, inclusive of all meals, snacks, room service, mini bar charges, etc. There are no specific guidelines for the cost for any meal. Any meal that is eaten alone should be classified as an “Employee Meal.”

Any expense reimbursement greater than the above guideline will be routed to the department budget owner for approval.

Any egregious expenses, as determined by Finance, may be routed to the executive level for review and approval.

Other Expenses

Business Meetings

Business meetings involving the rental of conference rooms, blocks of hotel rooms, catering, AV services, etc. may not be charged to employee personal credit cards. Expenses of this type must be paid for via a company credit card held by the department or via AP. If you have questions

about how to pay for services of this type please contact AP@acquia.com before booking or making arrangements.

Mobile Phone Reimbursement

Monthly mobile phone expenses are not reimbursable.

For external voice communications, the company's phone system, Zoom, should be your primary communication tool. Zoom is an app-based tool for your laptop and mobile devices that uses internet audio and eliminates the need and cost of a cellular call in most cases. Use of Zoom is a best practice and should be used for communication with customers, vendors, partners, etc. If you don't already have access to Zoom, please complete an IT Support ticket [here](#).

For internal and external meetings, the company offers Zoom and Google Meet. Additionally, for internal communications, Slack provides written, audio and video options. These tools can be used on your laptop and mobile devices.

If an employee travels to a foreign country for business purposes and needs to add service to their mobile plan in that country while they are there, those charges can be expensed. Also, a general exception to the reimbursement policy may be made for employees in countries where regulation or common local practice vary from company policy and for certain sales roles that rely heavily on non-Zoom cellular calls.

Client Gifts and Entertainment

Client Gifts and entertainment are governed by the [Acquia Code of Business Conduct and Ethics](#). Please refer to the policy prior to purchasing any client gifts. As a general rule gifts should be of de minimis value – no more than \$50.00 USD or local equivalent in value. All reimbursement requests must include the original receipt, description of what was sent, and a list of the people who received the gift.

Conventions/Training/Education

Managers must pre-approve any expenses related to attendance at any conventions/training, and education events or activities.

Overnight Off-sites and Outings

Any department or team off-site or outing requiring airfare, travel, hotel, or facility rental must be pre-approved by a member of the Executive Leadership Team or CxO level executive. Examples include QBRs, multi-day team building events, Engage, Sales Trainings, etc.

Professional Certification and Professional Organization Dues

Expenses related to obtaining and maintaining a professional certification such as exam fees, continuing education, or dues must be approved by a Director or Vice President. Reimbursement for certification expenses must be submitted through the category “Professional Certification.” A copy of the approval email from a Director or Vice President must be provided as an attachment to the expense along with a copy of the receipt.

Additional Reimbursable Expenses

- Cost for obtaining and processing visas necessary for business travel
- Inoculations required for business travel that are not reimbursable via company provided medical insurance
- Airline imposed baggage fees
- Laundry expenses while on a business trip lasting more than 5 consecutive days.
- Expenses related to obtaining security clearance for Acquia-related business.
- Bereavement flowers for close relatives of an Acquia employee. The approval of the CxO of the department is required prior to ordering and must be attached to the expense submission.

General Matters

Club Memberships

Club memberships of any kind (airline, alumni, lunch, dinner, golf, fitness, social, etc.) are not reimbursable.

Combining Business and Personal Travel

An employee may combine personal and business travel provided that the employee pays any additional cost and the personal travel does not interfere with the business purpose of the trip. Manager approval is required in advance and a copy of the approval must be attached to the expense submission. Saturday night stays may be considered for reimbursement as long as the additional hotel cost does not exceed the airfare savings. The employee must attach documentation of the cost difference between the two travel alternatives. Meals, ground transportation, and incidentals above and beyond what the traveler would have incurred during the business portion of the trip are not reimbursable. If the required documentation is not provided or the arrangements would incur additional cost, the expenses will not be reimbursed.

Purchase of Gifts for Employees

The purchase of gifts or rewards, including gift certificates, is not reimbursable. If you wish to reward an employee please do so via Work Tango or another Acquia sponsored program (“Night on the Town”). Acquia will not reimburse for birthday gifts, holiday gifts, or gifts to mark personal milestones.

The purchase of any Acquia apparel or accessories (SWAG) is not reimbursable via Navan. These purchases must be approved by the chief executive of the department and purchased through Accounts Payable and Coupa.

Small Group Situations

Whenever two or more employees attend the same meal, share a cab, or incur another expense that isn't billed separately, the highest-ranking employee should pay the charge and include it in their expense report. Employees should make their best effort to adhere to this guideline.

Spouse or Partner Travel and Meals

Spouse and partner expenses are personal expenses and will not be reimbursed under any circumstance. Any additional cost for lodging for spouses/partners must be paid by the employee.

Terminated Employee Reimbursement

Any employee who resigns or is terminated for any reason must submit all outstanding expenses by the last working day of their termination date in order for the expenses to be reimbursed. The expense report must be titled "Final Expense Report." If this is not possible, please work with your local HR business partner for reimbursement outside of Navan.

How to procure Shipping and Office Supplies

Any employees requiring shipping office supplies, please reach out to your local Facilities contact to use Company-aid options first. Acquia has contracts with Fedex and UPS in the US, DHL & Fedex in the UK, and Shri Sai Baba Courier in India. These can be used within each region even if you are not based in that country.

Acquia has business accounts with Amazon in the UK, Germany, and US. If any office equipment is required, please work with facilities to order these via these systems first before you attempt to procure these directly.

Expense Reimbursement

The company will reimburse employees for all reasonable, necessary, and properly documented expenses incurred in connection with company business. All expenses must conform to the guidelines of this policy. Employees are responsible for submitting expenses using Navan within thirty (30) days of purchase and with proper supporting documentation. Expenses that are

submitted over ninety (90) days after being incurred may not be reimbursed. At year end, all expenses from the previous year must be submitted within thirty (30) days of year end. For example, all expenses from 2025 must be submitted no later than January 31, 2026. Expenses submitted after January 31, 2026 that were incurred in 2025 will not be reimbursed.

Managers are responsible for reviewing and approving employee expense reports in a timely manner. Each individual expense must be reviewed, including review of receipts and reasonableness of cost. Any expense report that does not have the correct documentation or is outside of spending guidelines must be returned to the employee for correction and resubmission. **It is the manager's responsibility to ensure compliance with the policy guidelines.**

A manager can approve an expense report that is above policy guidelines, however please note that Finance performs a final review and will reject reports if there are out of policy items included and/or documentation is not sufficient.

Expense approvers may approve expenses outside or above the guidelines stated in this policy. Expenses outside the guidelines in this policy will be monitored and reported on by the expense admin team and may also be referred to the CFO for additional review. Examples of non-reimbursable items are provided in [Appendix A](#). Expense value guidelines are noted in each applicable section of this policy.

Employees should contact their manager for any questions regarding expense items, terms not specifically spelled out in this policy, or for language that needs additional clarification. Please ensure that your manager is aware of any travel arrangements you are making. If any expenses submitted for reimbursement are on [Appendix A](#), managers may not approve that expense under any circumstance. Employees and managers should contact navanadmin@acquia.com for information on how to procure non-reimbursable items, prior to making the purchase in question.

Expense Payments

To expedite reimbursement of expenses, employees should submit their expenses in a timely basis.

If direct deposit is available in the employee's country, employees will receive their reimbursement via direct deposit within 2-3 business days of approval. If direct deposit is not available in their country (currently India, Costa Rica, Singapore, and Japan), employees will receive their reimbursement via wire transfer. Wire transfers are processed every other Wednesday.

Proof of Expenditure

Employees must provide appropriate documentation for each expenditure. Itemized, original receipts are **required** for all expenses over \$25 USD or local equivalent. If a receipt is available for expenses under \$25 USD, it should be submitted.

- Acceptable receipts indicate the vendor, the date expense was incurred, location, and itemized charges.
- Hotel expenses **must** be accompanied by the itemized receipt (folio) provided by the hotel at check out.
- All receipts must be legible and complete. Photos of receipts should be in focus and no portion of the receipt should be obscured.
- Copies of credit card statements showing the vendor and amount paid will not be accepted in lieu of original receipts. If you lose a receipt contact navanadmin@acquia.com for instructions on what to do to document the expense.
- Individual departments may impose, at their discretion, more restrictive T&E proof of expenditures. At no time may they implement less restrictive standards.

Appendix A - Non-Reimbursable Expenses

The following expenses are business related, however, not reimbursable through Navan, rather are required to be purchased through the following avenues. Please refer to your IT/Facilities local contact or direct manager for more detail on how to make the following purchases.

- Office supplies (Staples and Amazon punch-out via Coupa)
- Shipping - (FedEx and UPS Accounts - US, DHL - UK, Shri Sai Baba Courier - India).
- Laptop and computer equipment (Contact IT Purchases)
- Business Cards (Contact Facilities)
- Rideshare Costs - Uber is offered as direct bill to Acquia
- Travel Insurance of any kind - Acquia has a travel insurance policy that covers Acquia employees who travel

The following expenditures are of a personal nature, prohibited by tax regulation, or not authorized by this policy. Non-Reimbursable Expenses include, but are not limited to:

- Airline upgrades outside of the allowable upgrades noted on page 5, Fare Class Exceptions
- Upgrades of any kind that add incremental cost to hotel, transportation, or car rental
- Spouse/companion travel/meal costs
- Car rental, airline, or hotel club membership fees
- Car rental insurance for all employees renting cars
- Advanced purchase fuel programs (“Fuel Service Option”) for rental cars
- Trip Cancellation Insurance
- Registered traveler programs (TSA Pre-check, Global Re-Entry, or similar)
- Passports or passport processing fees
- No-show or last-minute hotel cancellation fees without business reason
- Mobile phone expenses including monthly payment or equipment unless statutorily required and outlined in employment agreement.
- Home internet unless statutorily required and outlined in employment agreement
- Travel to/from Acquia Coworking Space if home office is within 50 mile radius of coworking space, unless outlined in employment agreement.

Appendix B - Approved Travel Agency

Navan has been selected as Acquia's global travel agency.

All employees must use Navan to book business travel.

If you have any questions contact traveladmin@acquia.com

Appendix C - Rental Car Insurance Card

AUTOMOBILE INSURANCE IDENTIFICATION CARD	IN CASE OF ACCIDENT								
<p>Company #: 35289 Company Name: Berkley National Insurance Company The above insurer certifies that the coverage provided by this policy meets the minimum liability limits prescribed by the law.</p> <p>Name and Address of Insured Acquia, Inc. 53 State Street, 10th Floor Boston MA 02109</p> <p>POLICY NUMBER TCA 7025116-12 EFFECTIVE DATE 1/1/2026 EXPIRATION DATE 11/1/2026</p> <table border="1"> <thead> <tr> <th>YEAR</th> <th>MAKE/MODEL</th> <th>VEHICLE DESCRIPTION</th> <th>VEHICLE IDENTIFICATION NUMBER</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td>Rented Vehicles</td> <td></td> </tr> </tbody> </table> <p>Agent: Lockton Companies, LLC Claim Reporting Number: 312-822-5000 Note: Lockton is not the insurance carrier.</p> <p>THIS CARD MUST BE CARRIED IN THE INSURED MOTOR VEHICLE FOR PRODUCTION UPON DEMAND</p>	YEAR	MAKE/MODEL	VEHICLE DESCRIPTION	VEHICLE IDENTIFICATION NUMBER			Rented Vehicles		<p>Get names and addresses of witnesses. Get names and addresses of injured, and or drivers and occupants of other vehicles. Get license numbers of vehicles involved. Report the accident at once to the State Police Department or other designated authority when required by law.</p> <p>EXCLUDED DRIVERS</p> <hr/> <hr/> <p>KEEP THIS CARD IN YOUR MOTOR VEHICLE WHILE IN OPERATION</p> <p><small>The front of this document contains a screened logo image. If the logo is not visible, the document is not valid.</small></p> <p>Rev. 06.26.09</p>
YEAR	MAKE/MODEL	VEHICLE DESCRIPTION	VEHICLE IDENTIFICATION NUMBER						
		Rented Vehicles							

**Insurer only provides coverage for persons operating an insured motor vehicle pursuant to policy.
 Coverage subject to terms, provisions, exclusions, and conditions in policy and any endorsements thereto.**

Section - Revision	Changes made	Who	Date
Version 1.0		BB	August 1,2020
Version 2.0		BB	September 18,2020
Version 3.0	Travel Insurance – link added	CP	March 2023
	Hotel – nightly rate updated from \$225 to \$300		
	Employee Meals <ul style="list-style-type: none"> ● Daily meal allowance increased from \$100 to \$125 		
	Terminated Employees <ul style="list-style-type: none"> ● Updated final expense report to be submitted by the last working days from 10 working days after employee leaves to reflect current situation. 		
	Section added - How to procure Shipping and Office Supplies		
	Non-Reimbursable expenses <ul style="list-style-type: none"> ● Section on Mobile phones amended. ● Section on Home Internet updated. ● Co working spaces – travel clarified. 		

	Dialpad replaced with Zoom phone		
Version 4.0	<p>New travel and expense vendor - Navan</p> <ul style="list-style-type: none"> - Flight/Hotel/Train/Car purchases will now be direct paid by Acquia - Simplification of “approval” mechanism - Policy adherence for hotels based on median price for the area, not set price point - Expense reimbursement now performed by Navan 	ED	May 2025
Version 4.1	Updated Rental Insurance Card	ED	January 2026