

Supplier Travel and Expense Policy for Billable Subcontractors

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This Supplier Travel and Expense Policy for Billable Subcontractors (“**Policy**”) provides guidance and global standards for reimbursement of expenses incurred by a third-party company (“**Supplier**”) and its employees, agents and contractors (“**Resources**”) in connection with the performance of subcontract services (“**services**”) for Oracle or on Oracle’s behalf for an Oracle end customer (“**Client**”) project. A Supplier and its Resources are also referred to individually as a “**Billable Subcontractor**” and collectively as “**Billable Subcontractors**”.

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OVERVIEW

This Policy outlines the standards for reimbursement of travel and business-related expenses incurred by a Supplier and its Resources in connection with the performance of subcontract services for Oracle or on Oracle's behalf for an Oracle Client project. This Policy may change without advance notice.

Supplier and its Resources must comply with this Policy. Supplier is solely responsible for reimbursing or otherwise paying its Resources for expenses incurred in connection with the services.

BILLABLE SUBCONTRACTOR RESPONSIBILITY

All Billable Subcontractors working on Client projects are expected to:

- Act in the best interest of Oracle and the Client by making prudent and economical travel and expense decisions.
- Confirm with the Oracle Delivery Manager / Project Manager ("**Oracle PM**") if any Client terms supersede any section of this Policy.
- Submit business expenses for reimbursement incurred only during the course of performing services.
- Submit business expenses that are reasonable, legitimate, and proper, and meet the standards in the Oracle [Supplier Code of Ethics and Business Conduct](#) (the "**Supplier Code**").
- Ensure the accuracy and timeliness of expense submissions. Inaccurate, incomplete or late submissions may result in delays in, or disqualification of, expense reimbursement.

Billable Subcontractors shall monitor Oracle's Subcontractors website (located here <https://www.oracle.com/corporate/subcontractors/>) for the latest version of this Policy.

BOOK TRAVEL

All Billable Subcontractors must book their travel in accordance with their company policy, including all non-US Billable Subcontractors engaged to perform services for an **Oracle Health** projects.

Exception: United States ("**US**") Billable Subcontractors engaged to perform services for an **Oracle Health** project **must** use Oracle's corporate self-booking tool ("**Oracle Travel Online**") or Oracle's contracted travel agencies ("**Oracle Travel**"). Billable Subcontractors can obtain instructions for booking travel from the Oracle PM or contact. If necessary to not use Oracle Travel, US Oracle Health Suppliers must obtain exception approval *prior* to the booking of travel,

EXPENSE REPORT SUBMISSION REQUIREMENTS

Unless otherwise stated in the applicable SOW, the following applies:

- Billable Subcontractors must submit weekly expense reports in Oracle's Cloud Contractors Expenses application ("**Expense System**").
 - A "week" for the purpose of the Expense System begins on Saturday and ends on Friday.
- Each expense report must be submitted into the Expense system within **five (5) business days** of incurring a reimbursable expense.
 - Any expense report submitted into the Expense system more than **fifteen (15) days** of incurring a reimbursable expense is ineligible for reimbursement and will not be approved.
- Expense reports must include a detailed description of the expenses incurred as well as the supporting documentation described in the [Proof of Payment and Receipt Requirements](#) section below. The Oracle PM will advise if additional supporting documentation is required in specific circumstances or for related expenses.

PROOF OF PAYMENT AND RECEIPT REQUIREMENTS

Billable Subcontractors must provide proof of payment for expenses incurred with valid and tax-acceptable receipts from a valid establishment that clearly states what goods and services were exchanged for payment. Billable Subcontractors must follow the [Contractors Expense Entry \(PDF\)](#) process document for entering expenses and attaching receipts. Attaching a receipt is mandatory for all Expense Items, except for valid expenses pertaining to the 'Per Diem' and 'Mileage Expense' Types. Expenses not supported by a required receipt are not eligible for reimbursement and will not be approved,

Oracle **will accept** receipts that include itemized detail of the expense from valid merchants. For example:

- Accommodation – itemized hotel folio showing payment.
- Meals – detailed restaurant receipt showing what was ordered and payment.
- Car Rental – itemized receipt detailing dates, car type, gas payment, rental location, and payment.

Oracle **will not accept** receipts that are hand-written or only show the total expense amount (e.g., credit card slips or statements).

Unless otherwise stated in a SOW, when submitting expenses:

- For an Oracle **Public Sector** Client project (e.g., government), Billable Subcontractors must supply **all receipts** for all expenses, regardless of the expense amount.
- For an Oracle **Commercial Client** project or internal Oracle project, Billable Subcontractor must supply receipts in accordance with Oracle's Expense receipt thresholds by country.
 - **Exception:** Upon Oracle's discretion, this receipt requirement may be waived for Per Diem expenses and stated in the SOW.

The [Contractors Expense Entry \(PDF\)](#) process describes how to handle exceptions. Oracle might also request receipts outside the Expense System.

EXPENSE REIMBURSEMENT APPROVALS

After a Billable Subcontractor submits expenses, they will be reviewed by an Oracle PM. Oracle PMs will approve only those expenses that comply with this Policy, the executed subcontract agreement between Oracle and the Supplier ("**Billable Subcontract Agreement**"), the statement of work ("**SOW(s)**"), and Oracle policies. Non-compliant expenses will *not* be reimbursed.

Additionally, Oracle:

- Will only approve and reimburse Supplier for expenses incurred by Billable Subcontractors in the regular course of their delivery of contracted services.
- Will *not* approve or reimburse the Supplier for the following:
 - Expenses incurred and submitted on behalf of, or at the request of any other party.
 - Expenses incurred prior to the execution of a SOW, unless otherwise approved in writing by Oracle.

Under no circumstances should a Billable Subcontractor submit for reimbursement any expense relating to conduct prohibited by Oracle's Supplier Code of Ethics and Business Conduct, which is available at <https://www.oracle.com/corporate/suppliers.html>.

Under no circumstances should a Billable Subcontractor attempt to falsify or mischaracterize expenses or otherwise evade the requirements of this Policy.

When unable to determine if specific expenses are reimbursable for a project/engagement, Suppliers or Billable Subcontractors must seek guidance from the Oracle PM prior to incurring expenses.

EXPENSE TYPES ALLOWED

This section identifies the **'Expense Type'** fields within the Expense System that may be used by Billable Subcontractors. Billable Subcontractors should only enter *allowable* expenses within each of the Expense Type categories detailed below.

1. Accommodation

Allowed Expenses:

- Oracle preferred hotels should be selected unless justified for business reasons.
- Hotel selection may not be influenced by a Billable Subcontractor's membership affiliations.
- Standard/corporate room accommodations must be booked. Billable Subcontractors may accept room upgrades from the accommodation provider only if the upgrade is at no charge.
- An extra room night to accommodate early arrivals on overnight flights when conducting business the following morning.
- Late checkout fees only when needed to accommodate an overnight flight.
- Hotel early departure fees.
- Laundry services only in the event of an unexpected emergency or extended duration (>3 nights), which requires advance approval of the Oracle PM.
- Hotel onsite gym access fees when the fee is not included in the hotel rate.

Expenses Not Allowed:

- Room upgrades (e.g., ocean view, concierge floors).
- Personal items that are lost, stolen, or delayed in transit.
- Minibar items including beverages and snacks, except when included as part of the maximum meal allowance.
- Entertainment fees (e.g., movie rentals, pay-per-view).
- Off-site gym fees.
- Laundry services when traveling for less than three nights.
- Hotel alternatives (e.g., Airbnb, Hometogo)
- Hotel no-show charges unless the Billable Subcontractor has a valid cancellation number and it is clearly justified and approved by the Oracle PM. It is the Billable Subcontractor's responsibility to cancel reservations and secure a cancellation number before the hotel deadline to avoid penalties.

2. Airfare

Allowed Expenses:

- Billable Subcontractors must fly economy class for all travel and accept the lowest unrestricted airfare.
- If there is no incremental cost to Oracle, Billable Subcontractors may use personal mileage benefits to upgrade reservations directly with the vendor after ticketing.
- Billable Subcontractors may NOT request higher coach fares to qualify for an upgrade.
- Seat fees when Airlines charge a fee to reserve standard economy seats.
- Baggage charges when the airline's standard practice is to charge for any checked bags.
- Excess baggage charges when traveling with heavy or bulky materials or equipment required for

performance of services or if traveling for longer than two weeks.

Expenses Not Allowed:

- Seat upgrades (e.g., business class, first class, premium seating) with an associated cost or fee.
- Personal items that are lost, stolen, or delayed in transit.
- Excess baggage charges except for when traveling with heavy or bulky materials or equipment required for performance of services or if traveling for longer than two weeks.
- Use of personal airline miles for business travel.
- Billable Subcontractors are not permitted to pilot, charter, or be a passenger on non-commercial aircraft while on Oracle business.
- No show fees. It is the Billable Subcontractor's responsibility to cancel or reschedule reservations to avoid penalties.

Note: For airfare expenses, submit the expense report after the travel is completed, and use the return date on the expense report.

3. Car Rental

Allowed Expenses:

- Most economical car size to safely accommodate the number of expected passengers.
- Rental cars are to be refueled before returning the vehicle to avoid higher fuel charges.

Expenses Not Allowed:

- Luxury or sports car rentals.

Notes:

- Consider ground transportation options carefully before renting a car.
- Public transportation, private transportation and shuttle services, taxis, airport or hotel shuttles often offer greater convenience and lower total cost in metropolitan areas.
- No show fees. It is the Billable Subcontractor's responsibility to cancel or reschedule reservations to avoid penalties.

4. Fuel – Diesel / Gas / Petrol

Allowed Expenses:

- Fuel for rental cars.

Expenses Not Allowed:

- Fuel for personal automobiles

5. Internet/ADSL/DSL/WiFi

Allowed Expenses:

- WiFi charges if free WiFi is not available during travel.
- Specifically approved home internet in case of pandemic or special scenarios.

Expenses Not Allowed:

- Personal internet/ADSL/DSL/WiFi charges.

6. Meals - All Client Projects (excluding Oracle Health U.S. and Canada)

Allowed Expenses:

- Meal reimbursements (including non-alcoholic beverages and snacks) for the Billable Subcontractor only, which are based on actual costs and subject to a maximum meal allowance of up to USD \$125 (or country local currency equivalent) per day (including tips, gratuities, room service fees and taxes).
- A tip of up to 15-20% of a meal bill is considered part of this daily maximum meal allowance in countries where tips are customary.
- If a Per Diem is approved, see the appropriate [Per Diem](#) section below.

Expenses Not Allowed:

- Alcoholic beverages.
- Additional gratuity when tips and gratuities are included a part of the total bill.
- Meals for any other parties (including Oracle employees and customers).

7. Meals - Oracle Health Client Projects (U.S. and Canada Only)

Allowed Expenses:

- Unless an exception approval is granted (as noted below), Meals and Incidental expenses reimbursement is based on actual expenses incurred, capped at the daily General Services Administration (“**GSA**”) meals and incidental expense (“**M&IE**”) rate (sometimes referred to as “**Per Diem**”).
 - For US travel, GSA M&IE rates can be searched based on Client travel site location using the [GSA website](#).
 - For international travel, M&IE rates can be found on the U.S. Department of State website ([U.S. Department of State | Home Page](#)).

Notes:

- **Reporting M&IE:** Daily actual meal expenses up to the GSA or country-specific Per Diem rate must be charged to the Client project as a billable expense task, using the appropriate expenditure type ‘Meals’ or ‘Misc. Contractor Expense’ for incidentals.
 - If an exception is approved (as noted below), the over the M&IE must be split, expensing the amount up to M&IE rate on the billable expenses task and the amount over the M&IE rate on the non-bill expenses task. The Billable Subcontractor should contact the Oracle PM if they have any questions on how to enter approved expenses.
- **Exception:** Expensing meals and incidentals above the GSA or country-specific Per Diem rates must be approved by Oracle before the expense is submitted for reimbursement.
 - It is the responsibility of the Billable Subcontractor to obtain this approval and to retain a copy of approval documentation to attach to the expense report. Unapproved amounts over the Per Diem rate will not be paid by Oracle.

Expenses Not Allowed:

- Alcoholic beverages.
- Additional gratuity when tips and gratuities are included a part of the total bill.
- Meals for any other parties (including Oracle employees and customers).

8. Mileage Reimbursement

Allowed Expenses:

- Mileage reimbursement *when a personal vehicle is used for travel*, and for each mile over daily commuting to/from home and office, using Oracle's local country reimbursement rate.

Expenses Not Allowed:

- Mileage for normal, daily commute to and from home to office.
- Fuel/gas when using a personal automobile.

Notes:

- Mileage expenses must include starting point, destination point, dates, business purpose, and miles driven.
- Billable Subcontractors will obtain the appropriate mileage reimbursement rate from the Oracle PM.

9. Misc. Contractor Expense

Billable Subcontractors are generally not allowed to use this Expense Type. Requests for such expenses are highly discouraged and rarely approval; therefore, approval for reimbursement must be obtained in advance from the Oracle PM prior to submitting any expense against this Expense Type.

Allowed Expenses:

- COVID-19 tests when required to travel to, or work at, a Client site.
- Immigration fees (e.g., consular entry visas and/or visa services, immunizations, passports).
- Incidentals related to GSA M&IE (Oracle Health US and Canada Only)
 - Incidental expenses are limited to fees and tips given to porters, baggage carriers, and hotel staff.

Expenses Not Allowed:

- Personal credit/debit annual card fees, late charges and/or interest.
- Any traffic, parking, or other vehicle code or criminal/civil fines or violations.
- Any insurance (including but not limited to: delayed/lost luggage, medical, personal property, travel accident insurance, AD&D insurance and rental car insurance).
- Personal health or travel insurance.
- Loss or theft of personal property.
- Gym or Health Club memberships.
- Tipping not related to Meal allowance (e.g., housekeeping, shuttle drivers, and bellhop).
- Travel items (e.g., toiletries, clothing, luggage, briefcases, backpacks, laptop bags and/or carts).
- Books, newspapers and magazines.
- Entertainment (e.g., holiday parties, concert tickets, sporting events, and adult venues)

10. Other Transportation

Allowed Expenses:

- Other means of transportation for travel (e.g., rail, tube, ferry, taxi, and etcetera).

Expenses Not Allowed:

- Seat upgrades with an associated cost or fee.

- Personal items that are lost, stolen, or delayed in transit.
- Excess baggage charges except for when traveling with heavy or bulky materials or equipment required for performance of services or if traveling for longer than two weeks.

Notes:

- Expense entry must include location travelled to and from, as well as the vendor information.
- Rail/train services should be booked directly with the rail provider at least seven days in advance. Billable Subcontractors must be cost conscious at all times when selecting class of service. Rail/train travel should be considered when:
 - Train fare is less expensive than air travel.
 - Door-to-door transit time is improved or comparable to air travel.
 - Driving presents an inconvenience or business risk (e.g., traffic).
- No show fees. It is the Billable Subcontractor’s responsibility to cancel or reschedule reservations to avoid penalties.

11. Parking & Tolls

Allowed Expenses:

- Airport parking.
- Toll bridges and toll road fees while traveling on business.

Expenses Not Allowed:

- Valet parking.
- Parking fees, toll bridges and toll road fees when not traveling for business.

Notes:

- Expense entry must include the locations and reason.
- Billable Subcontractors should consider if it is less expensive to take a shuttle, taxi, or shared car service to the airport versus paying a daily airport parking fee.

12. Per Diem or Per Diem Billing – Oracle Health Client Projects (U.S. and Canada Only)

Use of this Expense category is NOT ALLOWED. See the ‘Meals’ expense category above for information on M&IE expenses.

13. Per Diem or Per Diem Billing – All Client Projects (excluding Oracle Health U.S. and Canada)

Allowed Expenses:

- Allowed only when approved (see Notes): Per Diem reported must not exceed the daily allowances and Billable Subcontractors cannot seek reimbursement of additional expenses through other means or expenditure types.

Notes:

- Where legally required or obligated in the Client contract, Oracle will reimburse a Billable Subcontractor a fixed daily fee for expenses (“**Per Diem**”) in lieu of actual expenses.
- Per Diems must be specified in writing in the applicable SOW and agreed to in advance by the Oracle PM. The Billable Subcontractor will obtain from the Oracle PM the appropriate Per Diem allowance based on the location of where the Services are being provided.

14. Shipping Fees / Courier / Printing

Allowed Expenses:

- Postage/shipping fees.
 - Standard postage mail rates may be used only for sending hard copies of expense receipts or reports that must be mailed to Oracle (when required by Oracle country/Oracle PM).
 - Express mail rates are only allowed when advance approval is granted by the Oracle PM.
- Printing fees.

Expenses Not Allowed:

- Any costs related to shipping items through a courier or other means besides standard and/or express mail (as allowed).
- Personal postage/shipping fees.

Note: Expense entry must include the business purpose and the identification of vendor.

15. Small Office / Computer Supplies

Allowed Expenses:

- USB or Flash drives if required for the Services being performed at the Client site.

Expenses Not Allowed:

- Paper, pens, notebooks, and etcetera.
- Computers, routers, fax machines, printers, printer ink, and etcetera.
- Keyboard, mouse, cables, or other computer accessories.
- Software or computer support.

Note: All drives must either be returned to Oracle or left at the Client site.

16. Telephone – Home/Mobile

Allowed Expenses:

- Personal phone calls while travelling.

Expenses Not Allowed:

- Any cost incurred to establish or disconnect a connection, including installation and equipment costs such as phone instruments.
- Home landline, fax and internet/broadband charges.
- Cell phone hardware and related equipment (e.g., chargers, headsets, mounts, cases).
- Cell phone plans (e.g., data, texting and calls).

Note: Avoid using hotel phones and consider alternative methods such as internet communication and mobile phones when making long distance calls.

STATEMENT OF CHANGES

DATE	CHANGE REFERENCE
08-July-2022	Initial Document

DATE	CHANGE REFERENCE
07-October-2022	<ul style="list-style-type: none"> Clarify expense receipt submission requirement for per diems. Allow for reimbursement of Immigration Fees. Removed the “Expense Types N/A for Subcontractors” section as these expense types no longer appear in the Expense System. Renamed “Misc. Employee Expenses” expense type to “Misc. Contractor Expense”.
19-October-2022	Clarify expenses submitted against the ‘Misc. Contractor Expenses’ Expense Type are highly discouraged and rarely approved.
21-October-2022	Removed “Room Service Fees” from the Expenses Not Allowed under the ‘Accommodation’ Expense Type and added in the ‘Meals’ Expense Type.
09-November-2023	<ul style="list-style-type: none"> Added a new “Book Travel” section. Shifted the location of “Expense Report Submission Requirements” section up after the new “Book Travel” section. Shifted the location of “Expense Reimbursement Approvals” section down after the “Proof of Payment and Receipt Requirements” section.
21-November-2023	Added a new ‘Per Diem or Per Diem Billing – Oracle Health Client Projects (U.S. and Canada Only)’ section.
23-April-2025	<ul style="list-style-type: none"> Revised the ‘Book Travel’ section to address exceptions for Oracle Health booking travel through Oracle Travel. Added link to the Contractors Expense Entry (PDF) process document. Added “No show fees” as Expenses Not Allowed under the ‘Airfare’, ‘Car Rental’ and ‘Other Transportation’ Expense Types. Added new ‘Meals – Oracle Health Client Projects (U.S. and Canada Only)’ section. Updated ‘Per Diem or Per Diem Billing – Oracle Health Client Projects (U.S. and Canada Only)’ section. Added ‘Incidentals’ bullets to the ‘Misc. Contractor Expense’ type (Oracle US and Canada Only).