

Iron Mountain Travel and Expense Policy for Vendors

1.0 General Policy Statements

- 1.1 This policy applies to any Vendor individual executing services on behalf of Iron Mountain ("Traveler"), who travels on Iron Mountain business and/or incurs related expenses on behalf of Iron Mountain.
- 1.2 Travel and business expenses submitted by Travelers must be reasonable and necessary, are to be within the guidelines of this policy, and will be reimbursed with proper documentation as per the PSA.
- 1.3 Travelers should use good judgment and incur expenses as carefully and judiciously as they would their own.
- 1.4 Iron Mountain will not reimburse travel and business expenses that are out of compliance with this policy.
- 1.5 Alternatives to travel and in-person meetings such as video conferencing and teleconferencing should be used whenever appropriate in lieu of travel.
- 1.6 Travelers will certify the accuracy and the legitimacy of travel and business expenses via the submission of expense reimbursement requests.
- 1.7 Travelers will submit expense reimbursement requests within a timely manner from trip completion or business expense date in accordance SOW guidelines.
- 1.8 Travel and business expenses must be approved by the Iron Mountain Project Manager.
- 1.9 Expense receipts should be retained in accordance with Vendor's expense policy. Vendor shall perform internal audit and checks of expenses reports. Upon written request by Iron Mountain for specific expense report receipts, Vendor will provide copies of reports and corresponding expense receipts submitted by project staff. Receipts are required for mostly non-traditional expense or expenses incurred in cash and no receipts are required for expenses incurred if the expense is less than \$25.

2.0 Air Travel Policy

- 2.1 Advance Purchase: Travelers must purchase air travel at least 14 days prior to departure, unless the booking is to a destination or with an airline that doesn't offer a fourteen (14)-Day advance fare or flying on a "discount" airline such as Southwest Air.
- 2.2 Lowest Logical Fare: All reservations should be made at the lowest logical airfare within reason taking into consideration timing, airport location, flight connections, and meeting schedules. Travelers should not factor in consideration of personal gain from programs such as airline frequent flyer mileage when making such decisions.
- 2.3 Class of Service: Iron Mountain will only reimburse Vendor's travelers for flying coach class unless **the flight segment is six (6) or more hours in which case an upgrade of one class may be made** at the lowest usable fare at the time of booking.
- 2.4 Upgrades: Iron Mountain will not reimburse travelers for the cost of an upgrade. Travelers may choose to personally pay for the cost of a class of service upgrade or use their own frequent flyer points to upgrade.
- 2.5 Frequent Flyer Programs: Frequent flyer club membership fees are considered a personal expense and will not be reimbursed by Iron Mountain. Using personal points to upgrade is allowable but not at the additional expense of Iron Mountain.
- 2.6 Airline Club Memberships: Travelers may join airline clubs at their own expense. Iron Mountain will not reimburse these fees.
- 2.7 Cancelled, Unused and Lost or Stolen Tickets: All airline tickets, wholly or partially unused, should be returned to the travel agent for refund processing no later than one (1) week after cancellation or completion of travel. Lost or stolen tickets should be reported immediately. Claims can be made with all major airlines for reimbursement. Most airlines charge a \$75 fee to process a lost ticket application. Iron Mountain shall not be liable for any lost ticket processing fees.

- 2.8 Non-Refundable Tickets: Travelers must purchase nonrefundable airline tickets when available. Refundable tickets are not allowed and will not be reimbursed.
- 2.9 Overnight Delays: In the event an airline delay requires an overnight stay, Travelers should attempt to secure complimentary lodging from the airline.
- 2.10 Preferred Seating: Travelers should make reservations as early as possible to receive a seat assignment. Preferred seating costs and boarding fees will be reimbursed in accordance with local procedures.
- 2.11 Baggage Fees: Baggage fees will be reimbursed for checked bags within airline's standard baggage allowance.
- 2.12 Internet Fees: Internet fees will be reimbursed for work related activities.
- 2.13 Visas: The cost for obtaining and processing visas will be reimbursed. It is the responsibility of the traveler to verify visa requirements prior to travel.

3.0 Lodging Policy

- 3.1 Travelers should book hotel reservations that are reasonably priced for the market.
- 3.2 If a Traveler is traveling on an overnight flight he/she may book a hotel room for the day/night prior to arrival.
- 3.3 Reimbursements for room or suite upgrades are not allowed.
- 3.4 Travelers are responsible for any cancellation or no-show charges unless there is a valid business reason for not doing so.
- 3.5 Employees are encouraged to pack an adequate amount of clothing. Reasonable laundry expenses on trips of five consecutive nights or longer will be reimbursed.
- 3.6 Expenses for movies, pools and health clubs do not qualify for expense reimbursement.

4.0 Meals

- 4.1 Meals should be reasonably priced and itemized on your expense report. Alcohol may be claimed with dinner but the cost of the alcohol must not exceed the cost of the food claimed.
- 4.2 Travelers are expected to meet Iron Mountain's standard daily per diem of \$100USD. Consideration is given for high cost domestic and international cities such as New York, San Francisco, London or Moscow and Sao Paulo. Mini-bar charges will be calculated as part of the daily meal allowance and should not include the purchase of alcohol.
- 4.3 Gratuities are reimbursable when confined to reasonable limits based on local norms but should generally not exceed 20%.

5.0 Rental Car and Ground Transportation

- 5.1 General Guidelines: Travelers should only rent cars when other less expensive modes of transportation, such as taxis or shuttle bus services, are impractical, unavailable or more costly.
- 5.2 Inspecting Vehicles and Reporting Accidents: Travelers should always inspect rental vehicles and report any damage before driving them to the vehicle rental agency. Travelers should obtain a copy of the damage notice from the rental agency prior to driving away. In the event of an accident, Travelers must file an accident report with the local authorities and the vehicle rental agency.
- 5.3 Rental Car Insurance: Travelers shall follow the requirements set forth by the Vendor with respect to obtaining car rental insurance, but, to the extent that the Vendor has corporate insurance to cover claims arising as a result of car rentals, Iron Mountain requests that insurance coverage not be duplicated.
- 5.4 Refueling: Travelers should utilize Vendor's pre-negotiated rate for gas fill up for rental vehicle returns.
- 5.5 Returning Rental Cars: Travelers must make every reasonable effort to return the rental car to the original rental city (unless approved for a one-way rental). Car rentals shall be returned within the grace period afforded under the car rental agreement in order to avoid additional charges.
- 5.1 Limousine or Black Car Service: Limousine or black car service is not reimbursable with the exception of Senior Vice Presidents and above; however is reimbursable for all Employees when traveling in high risk countries as determined by Global Security. Consult Global Security for guidance.

5.2 Hotel and Airport Courtesy Van: It is suggested that hotel courtesy vans and airport buses to central cities be used if they are available and meet the traveler's needs.

6.0 Other

6.1 Foreign Currency: If foreign currency is required Employees may obtain it prior to travel, or from a currency exchange or ATM abroad. The Company will reimburse all costs associated with this conversion on receipt of appropriate paperwork as required by this Policy and local travel and business expense procedures.

6.2 Mileage Reimbursement: Traveler will follow Vendor's expense reimbursement policy for mileage. For local travel, mileage, including tolls, will be charged for the actual days travelled to the project work location. The only exception to this is individuals who receive a car allowance. Mileage will not be reimbursed in this instance.

7.0 Summary Table: Non-Reimbursable and Approved Reimbursable Travel and Business Expenses; The non-reimbursable items in this section are not all-inclusive. Employees should use their best judgment.

Non-Reimbursable Expenses	Approved Reimbursable Expenses
<ul style="list-style-type: none"> • Airline, hotel or car rental upgrades that add incremental cost • Spouse/companion travel costs • Airline seat upgrade purchase fees • Travel to/from employees' home and normal work location (commuting) • Finance charges or late fees for any credit card • Bank and ATM fees other than currency conversion fees • Insurance options of personal property, flight or travel insurance • Rental car insurance (unless not covered by Preferred Vendor or available in the location required.) • No-show or last minute hotel cancellation fees, as per the conditions in section 2.7.3. • Fines for traffic or parking violations, court costs • Damage/theft of an employee's vehicle while on Iron Mountain business • Stolen items • Loss of personal funds while on Iron Mountain business • Duty charges on personal items/gifts • Personal grooming items • Barber, hairstylist, shoe shine or massages • Pet care • Gifts and donations of a personal nature • Child care expenses • Gym membership • Personal entertainment: in-flight movies, in-room hotel movies, sightseeing tours, theater tickets, green fees, spa charges) • Personal reading materials • Personal luggage, briefcases, travel gear • Parking fines and tool infringements • Registered Traveler Programs (i.e. Clear or Global Entry) unless with Senior Vice President approval. 	<ul style="list-style-type: none"> • Airline, train, hotel, car rental, taxi or other expenses relating to business travel • Laundry or dry cleaning service when duration of trip exceeds five nights, but must be done while traveling • Fuel charges for rental vehicles • Individual meal expenditures • Business entertainment expenditures • Parking charges • Toll charges for bridges, highways and tunnels • Cost for obtaining and processing Visas and passports necessary for business travel • Medical inoculations/vaccinations required for travel • Airline checked baggage fees • In-flight internet for work related activities • Airport internet for work related activities • Business meeting expenses • Mini-bar, except for alcohol and if within the maximum local currency equivalent daily meal allowance. • Foreign Currency Exchange • Medical Expenses