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1. PURPOSE

The purpose of this policy is to establish the standards and requirements for Amneal employees, consultants, contractors, and/or board members, collectively “colleagues,” who are required to travel on behalf of the Company to ensure that travel is conducted responsibly, economically, and consistent with colleagues’ reasonable expectations of safety, comfort, efficiency, and convenience.


2. SCOPE

This policy applies to all Amneal colleagues who incur eligible business expenses and seek reimbursement from the Company for approved cash/credit card paid out-of-pocket expenditures. This policy also applies to any manager who is responsible for approving expense reports to confirm they comply with this and other applicable Amneal policies. For Candidate expense submission, please see the separate Candidate Expense Guidelines document and Candidate Expense Reimbursement Form.

3. POLICY

3.1. Policy Summary

- 3.1.1. This policy addresses business expenses incurred by an individual in connection with his/her conduct of business on behalf of the Company. The Company will reimburse colleagues under this policy for reasonable, customary, and necessary out-of-pocket travel expenses whenever the colleague is required to be away from the primary work location, as long as the expenses are incurred for business-related activities. Colleagues will be reimbursed for only those approved expenses which are reasonable, necessary, substantiated, and within the guidelines of this policy. It is the responsibility of each colleague incurring such expenses and each department head and/or supervisor to ensure policy guidelines are followed.
- 3.1.2. This policy does not contain every possible exceptional circumstance. The absence of a specific direction or definition in this policy does not mean the item is approved as an acceptable practice based on the specific circumstances warranted. Lavish or extravagant expenses (i.e., unnecessarily high-priced hotels, expensive wines or meals, excessive tips, etc.) are generally prohibited. If clarification of an exception is required, then such clarification is to be sought from your manager. Colleagues are expected to conduct the Company’s business with integrity, in compliance with applicable laws and policies, and in a manner that excludes considerations of personal advantage.
- 3.1.3. All supporting documentation (e.g., receipts, sign-in sheets, etc.) must be legible and easily readable. Once the expense report is approved, it becomes the official record for those transactions. Therefore, it is important for managers to confirm during the approval process that all supporting documentation is easily readable and complete.

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3.1.4. Colleagues are required to document all travel and submit any expenses for reimbursement through the Company’s online Concur system. **Colleagues who have a corporate credit card must submit expense reports only once per month. Colleagues who do not have a corporate credit card may submit expense reports every two weeks.** Non-colleagues (i.e., consultants, temporary colleagues) while complying with the standards in this policy, may utilize alternative, appropriate methods of reimbursement such as POs, invoices, etc. Non-colleagues should comply with the standards of this policy, unless otherwise stated in the statement of work.

3.1.5. Managers are responsible for reviewing and approving expenses for their direct reports to ensure the expense report has all required supporting documentation (e.g., receipts, sign-in sheets, etc.) and the expenses comply with this and other applicable Amneal policies (e.g., Policy on Educational Items, Meals, Travel and Prohibition on Gifts and Entertainment to Healthcare Professionals). Managers who approve expenses that do not comply with Amneal policies may face disciplinary action, which may include loss of T&E approval authority, a written warning, and/or termination of employment.


3.1.6. Expenses that require pre-approval should be documented (e.g., via email) and attached to the corresponding expense in Concur.

3.2. Traveler Responsibilities

3.2.1. Each colleague is responsible for exercising good judgment in spending Company funds and for ensuring travel and non-travel related business expenditures are appropriate for business needs. Before traveling, the Company expects colleagues to consider whether there is a more cost-effective way to meet business objectives without traveling, by use of technologies such as video conferencing, audio conferencing, and/or the use of web conferencing. This also includes combining trips whenever possible, and limiting the number of colleagues traveling to only those necessary to meet the business objective.

3.2.2. For domestic travel, colleagues are required to make all travel arrangements for flights and car rentals through the Concur travel website or through the Company’s designated travel agent (employees should make every effort to book through the Concur travel website, as there are additional costs when booking through the travel agent). Any exceptions to make travel arrangements outside of Concur require prior approval from a VP-level or above in their respective department on a case-by-case basis. Pre-approval should be documented (e.g., via email) and attached to the corresponding expense in Concur.

3.2.3. Prior to booking international travel in Concur, the employee should contact the Company’s designated travel agent to ensure the best price is being obtained. Transcontinental/international travel arrangement must be pre-approved by a member of the Executive Committee. Pre-approval should be documented (e.g., via email) and attached to the corresponding expense in Concur.

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3.2.4. Field sales representatives, medical science liaisons, and managed market employees may make hotel reservations outside of the Concur system only if the rates are lower than what is offered in Concur.


3.2.5. It is the responsibility of colleagues traveling on business for Amneal to:

- 3.2.5.1.** Take appropriate precautions to prevent theft/loss of Company and personal property (i.e., cash, tickets, equipment).
- 3.2.5.2.** Provide feedback to the Company on ideas for improving the effectiveness and efficiency of the travel policy and programs.
- 3.2.5.3.** Adhere to the preapproved travel itinerary.
- 3.2.5.4.** Ensure completed expense reports are submitted through the Concur online system for approval. Approval routing within the Concur system will follow the Company's established Authority Limits Policy. Submissions should include any necessary documentation.
- 3.2.5.5.** Follow this policy in a manner consistent with our values of integrity and accountability and the Company's Code of Conduct. Any falsification of colleague T&E expenses is considered fraud and will result in appropriate disciplinary action up to and including termination.

3.3. Approver Responsibilities

3.3.1. The following are key responsibilities for all Amneal managers with approval authority:

- 3.3.1.1.** Ensure the travel and expense policies and procedures outlined in this document and any addenda are understood and followed by colleagues.
- 3.3.1.2.** Determine that any business trip is essential and the benefits of the trip cannot be achieved through other less costly means (e.g., telephone calls, video/web conferencing, incoming supplier visits, etc.).
- 3.3.1.3.** Limit the number of personnel traveling on a given trip to those necessary to achieve expected business results.
- 3.3.1.4.** Review expenses in the Concur online system to ensure all appropriate and necessary documentation is attached.
- 3.3.1.5.** Ensure completed, submitted expense reports are approved. Prompt processing of online expense reports for approval and working with the traveler to resolve questionable expenses, missing documentation, or the receipt.
- 3.3.1.6.** Effective management of travel and entertainment expenses in the context of this policy and the overall departmental T&E budget, and in a manner consistent with our values of integrity and accountability, the Company's Code of Business Conduct, the Company's HR Colleague Handbook, and other applicable Amneal policies. Failure to do so will result in appropriate disciplinary action up to and including termination of employment from the Company. The CEO and the CFO can restrict the approval authority of individual managers either temporarily or permanently.

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3.4. Reimbursement


- 3.4.1. Business travel and entertainment expenses will be reimbursed if all of the following requirements are met:
- 3.4.1.1. Expenses are submitted, along with required documentation, through the Company’s Concur online system (except for non-colleagues as defined in Section 3.2.5).
 - 3.4.1.2. Expenses are cost effective and necessary, reasonable, and customary.
 - 3.4.1.3. Expense reports are accompanied by appropriate and necessary supporting documentation.
 - 3.4.1.4. The expense report is approved in accordance with the Company’s Authority Limits policy.
 - 3.4.1.5. Expenses are properly supported with documentation as described in the “Receipts” section below.
 - 3.4.1.6. Expense Reports for the CEO are approved in Concur by the CFO or designee, and periodic reports summarizing the CEO’s travel expenses are provided to the Chairman of the Audit Committee for review.

3.5. Receipts

- 3.5.1. Original receipts are required for reimbursement for ALL meals, and for all other expenses. Missing receipts in excess of \$25.00 require the Missing Receipt Affidavit Form. Other expenses for which receipts are not required include items such as, tips, bus fare, etc., which are typically paid in cash. The receipt should indicate that a payment has been made.
- 3.5.2. Proof of payment (e.g., credit slip) is required for all meals. In addition, all field based personnel are required to submit itemized receipts for all meals. For all other employees itemized receipts are required when the average cost of the meal exceeds \$125 per person. For meals that include a healthcare professional (HCP), itemized receipts and proof of payment are required at all times, regardless of the cost of the meal.
- 3.5.3. Receipts should show the vendor name, location, date of expense, description of item(s) or service(s), and proof of payment. Credit card statements are acceptable as a substitute for receipts only in instances where an original receipt was not issued or was lost.
- 3.5.4. All company airfare should be charged directly to the Corporate Credit Card through Concur or directly through our designated travel agents. As such, colleagues must link the airfare expense to an expense report when submitting their expenses through Concur in order to confirm the travel is business-related (refer to Concur User Guide).

3.6. Eligible Expenses for business travel

- 3.6.1. Airfare
- 3.6.1.1. International Travel - Senior Director and above can fly business class on transcontinental/international flights 5 hours or longer. Exceptions to this policy are approved only at the discretion of the senior executive of the function (direct reports to the CEO).

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- 3.6.1.2.** Domestic Travel - Senior Directors and above can fly first/business class on North America flights with a duration of 5 hours or longer, (including layovers). Exceptions to this policy are approved only at the discretion of the senior executive of the function (direct reports to the CEO).
- 3.6.1.3.** Employees, regardless of level, who take an overnight flight and intend to work in an Amneal office the next day, are eligible to purchase a business class/first class ticket with prior approval from an Executive Committee team member.
- 3.6.1.4.** Use of non-refundable airline tickets is encouraged as they can greatly reduce the cost of air travel. Non-refundable tickets should be used whenever the colleague expects to complete the trip as planned or when going to a frequently traveled destination. The Company will pay for these tickets through the standard expense process even if the trip is not completed. Colleagues should understand the restrictions on non-refundable tickets before purchasing them. Travelers do have the flexibility of having a non-refundable ticket/reservation voided as long as the reservation is cancelled no later than 12 midnight the following business day. Travelers should notify the Company's designated travel agency immediately anytime a reservation/ticket has to be cancelled.
- 3.6.1.5.** Amneal will reimburse employees for one membership in an airline club (e.g. United Club and/or American's Admirals Club) with executive committee approval.

3.6.2. Train fare


- 3.6.2.1.** Coach or economy class only. Requests for business class require pre-approval by the colleague's direct manager. Pre-approval should be documented (e.g., via email) and attached to the corresponding expense in Concur.

3.6.3. Car rentals

- 3.6.3.1.** Economy to mid-size cars should be used depending on the number of people traveling. Rental cars should be refueled, whenever possible, before being returned.
- 3.6.3.2.** Travelers should utilize the Company's preferred vendors, but ultimately cost should be the determining factor. NOTE: In some cases the use of taxi service or hotel shuttle is substantially less expensive than renting a car. If a traveler is not traveling a great distance between the airport and their destination/meeting, a taxi service or a hotel shuttle should be considered an option.
- 3.6.3.3.** In the US, the Company's insurance policies cover any damage to a rental car while being used by an Amneal colleague. There is no need to purchase additional insurance coverage from a rental car company.
- 3.6.3.4.** If renting outside of the US, you should purchase both liability and physical damage coverage from the rental car company.

3.6.4. Personal auto (mileage only)

- 3.6.4.1.** Mileage is reimbursed by the Company at the official IRS rate in effect at the time (as promulgated by Amneal Finance Organization).

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3.6.4.2. Mileage reimbursements will be paid for valid business reasons only. These include use of a colleague’s personal vehicle for approved necessary and customary business needs such as travel to/from a customer or vendor’s place of business or to/from the airport for business-related trips.

3.6.4.3. Amneal will reimburse colleagues for any miles that go beyond the normal roundtrip home to work commute.

3.6.4.3.1. For example, Colleague A typically travels from their home to the Bridgewater, NJ office and it is 25 miles one way (50 miles roundtrip). Colleague A is travelling to Kentucky this week, and the distance from their home to the airport is 40 miles (80 miles roundtrip). The colleague would be permitted to expense the 30 mile roundtrip difference between their normal commute and their commute to the airport.

3.6.4.3.2. For example, Colleague B typically travels from their home to the Bridgewater, NJ office and it is 10 miles one way (20 miles roundtrip). Colleague B sometimes travels to Brookhaven, NY and the distance from their home to the Brookhaven, NY facility is 100 miles (200 miles roundtrip). The colleague would be permitted to expense the 180 mile roundtrip difference between their normal commute and their commute to the Brookhaven facility.

3.6.5. Ground transportation – Includes taxis, shuttles, and company preferred car services.

3.6.6. Hotel lodging

3.6.6.1. For traveling between Company sites in different states, hotels offering discount rates through contracts with the Company’s designated travel agency should be used.

3.6.7. Meals


3.6.7.1. The Company will only reimburse reasonable expenditures for meals. It is the Company’s expectation that employees will use sound professional judgment when determining what is reasonable. Meals should be modest, reasonably priced and the total amount per day spent on all meals and/or snacks should not exceed \$150. The Company realizes in certain travel destinations, such as New York City or San Francisco, meals can be more expensive than the dollar amounts noted above. In these cases, the employee and the T&E approver must use their business judgment when determining what is considered reasonable and customary in those locations.

3.6.7.2. Managers who approve T&E reports are responsible for ensuring that business meals while traveling are reasonable and justified, and therefore reserve the right to reject or reduce any reimbursement request that is not reasonable and justified.

3.6.8. Business Meals Taken with Other Colleagues

3.6.8.1.1. Meals with other Amneal colleagues (and/or vendors) should be classified as business meals in Concur. All attendees should be listed in Concur.

3.6.8.1.2. The reasonable cost of meals with other colleagues is reimbursed only when clearly necessary and beneficial to the efficient conduct of Company business, as approved by the colleague’s

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manager. **The most senior level colleague must pay for the expense.** The only exception to this rule is when a sales representative is having a lunch and learn with a customer (e.g., HCP), and their manager or a home office employee is in attendance. In this scenario, the meal should be paid for by the sales representative and the manager may approve the expense.

3.6.8.1.3. The Company will pay for cost effective reasonable colleague meal expenses off Company premises which do not involve an outside customer, vendor, or colleague based in a different work site only when the event is part of a pre-approved (by Department VP or above) event for recognition or organizational development and if not otherwise provided for in another more formal local policy. As with other meal and entertainment charges, the most senior level colleague must pay for the expense.

3.6.8.1.4. The Company will pay for reasonable colleague meal expenses on Company premises not involving an outside customer, vendor, or colleague based in a different work site in cases such as business meetings, special recognition or other onsite events where cost effective, necessary and beneficial to the conduct of Company business, as approved by the Department VP or above. **As with other meal and entertainment charges, the most senior level colleague in attendance should pay for the expense.**

3.6.9. Meals with Healthcare Professionals (HCPs)

3.6.9.1. Meals with HCPs are subject to various federal, state, and local laws. This may include limits on spending, frequency, and reporting requirements. Refer to the Company's Policy on Educational Items, Meals, Travel, and Prohibition on Gifts and Entertainment to HCPs for additional information.

3.6.10. Alcohol

3.6.10.1. The Company will not reimburse employees for expensive alcohol charges such as expensive bottles of wine.

3.6.11. Entertainment

3.6.11.1. Entertainment activities must be approved by a VP or above, and the activities must comply with the Company's Code of Conduct, the Company's HR Employee Handbook, and Global Anti-Corruption Policy.

3.6.12. Tolls & Parking


3.6.12.1. Colleagues should use economy airport parking when practical.

3.6.13. Tips/Gratuities

3.6.13.1. Reasonable amounts only (for meals, generally not to exceed 15-20% of bill).

3.6.14. Laundry expenses

3.6.14.1. For trips of longer than (5) consecutive days.

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3.6.15. Currency Conversion

3.6.15.1. Amneal will cover the fees associated with converting money into local currencies and back into the original currency.

3.6.16. Passports and Visas

3.6.16.1. If a passport, visa, or other travel documents are required to travel on business, Amneal will reimburse the cost.

3.6.17. Other reasonable business expenses on a case-by-case basis as approved by the Department VP or above. Pre-approval should be documented (e.g., via email) and attached to the corresponding expense in Concur.

3.7. Other Eligible Expenses

3.7.1. Storage Units

3.7.1.1. Storage unit fees for field sales representatives are reimbursable expenses when utilized for the exclusive storage of Company materials and property. For example, sales representatives are required to have storage units for Company product samples and promotional materials.

3.7.2. Seminar Fees

3.7.2.1. Professional development courses offered by third parties or training outside of tuition reimbursement should be categorized as Seminar Fees in Concur.

3.7.3. Meetings

3.7.3.1. Resources (e.g., hotel conference room space, A/V equipment) for Company meetings with internal or external colleagues to discuss business related topics should be categorized as Meetings in Concur.


3.7.4. Car Wash

3.7.4.1. Reasonable fees for car washes are only reimbursable for individuals who have a company car.

3.7.5. TSA Pre-Check Program – Amneal will reimburse frequent business travelers (which are defined as individuals who travel 4 or more times per year) for TSA-Pre Check if approved by the employee’s manager. TSA Pre-Check is not reimbursable if it is included or covered by another program (e.g., airline club).

3.8. Ineligible Expenses

3.8.1. Airline upgrades (i.e., economy to business class/first class) below Sr. Director-level, unless pre-approved by the senior executive of the function (direct reports to the CEO) prior to travel.

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3.8.2. Cell phone charges for personal cell phones other than specific charges for itemized, business related calls (applies to cell phone charges which are not otherwise reimbursable by the Company under separate cell phone policy).

3.8.3. Books and magazines.

3.8.4. Gifts.

3.8.5. Personal entertainment expenses.

3.8.6. In-room movies at hotels.

3.8.7. Health club memberships and spa treatments.

3.8.8. Personal automobile insurance expenses (insurance deductible etc.).

3.8.9. Parking tickets or traffic violations (including when operating a rental car).

3.8.10. Pet care and/or flight.

3.8.11. Air flight and travel insurance.

3.8.12. ATM fees (unless directly related to travel and approved as exception).

3.8.13. Annual credit card fees.

3.8.14. Clothing and other personal items.


3.8.15. Other expenses not related to company travel.

3.9. Special Circumstances

3.9.1. Unused Tickets / Cancellations

3.9.1.1. The travel agency must be made aware of a trip cancellation as soon as possible to ensure proper credits or refunds are issued.

3.9.1.2. The Company's designated travel agency will attempt to convert all unused tickets, credits and unused deposits to offset another Company travel cost or obtain a refund.

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3.9.2. Saturday Night Stay

3.9.2.1. A Saturday night stay is allowed if the additional hotel, meal and other expenses incurred for staying over does not exceed the airfare savings, or when there is \$300 or more in overall savings when factoring in the cost of the hotel, meals, etc.

3.9.3. Consecutive Business Trips

3.9.3.1. There may be some situations where one business trip will end on a Friday afternoon and the next business trip requires Sunday night travel of the next week. “Linking” both trips into one offers an opportunity for additional airfare savings. If it makes economical and personal sense to stay in one of the two locations over the weekend by “linking the business trips”, the Company will reimburse for the additional hotel/meal/car rental and other travel related expenses incurred due to the extension of the trip. The incremental cost of staying over the weekend cannot exceed the cost of what it would have been to take two round trip business trips.

3.9.4. Lost Baggage

3.9.4.1. Responsibility for retrieving and compensating for lost baggage lies ultimately with the airlines if the baggage was lost in the possession of the airline (i.e., checked baggage).


3.9.5. Cancellations – Hotels

3.9.5.1. Hotel reservations made by the designated agency will be guaranteed for late arrival unless otherwise specified. If a hotel reservation needs to be cancelled it is the colleague’s responsibility to contact the agency to cancel the reservation. The agency or the hotel will provide a cancellation number relieving the Company and the colleague of any obligation for payment. Failure to cancel a room “guaranteed for late arrival” can result in a “no-show” charge, typically equal to one full room night charge, and the colleague will be personally responsible for these fees unless a cancellation number is provided or the colleague received permission from his/her supervisor for the Company to incur this fee. The colleague should only cancel hotel reservations directly in rare emergency situations.

3.10. Policy Governance & Restrictions

3.10.1. CEO Authority

3.10.1.1. The CEO and CFO have the authority to and may impose additional restrictions on travel and expenses across the Company as necessary without the need to formally modify this policy. The Corporate Compliance Department will interpret and administer the implementation of this policy.

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4. REFERENCE AND RELATED DOCUMENTS

Document Number	Title
POLICY-COMP-0003	Educational Items, Meals, Travel, and Prohibition on Gifts and Entertainment to Healthcare Professionals Policy
Guidance Document-0002	Guidance on Travel and Entertainment Expenses for Healthcare Professionals and Speakers
	Global Anti-Corruption Policy
	Missing Receipt Affidavit Form
	Concur User Guide
	Candidate Expense Guidelines document
	Candidate Expense Reimbursement Form

5. DOCUMENT RETENTION

Amneal colleagues and Covered Persons must retain records created in connection with this policy to permit adequate monitoring and auditing by Amneal and to comply with applicable laws and regulations. Amneal colleagues and Covered Persons must consult the Amneal Records Retention Standards, applicable Amneal Records Retention Schedules, and any applicable Document Preservation Notices to determine the duration of retention required.


6. REPORTING & DISCIPLINE

Questions/Assistance: If you have any questions about how to comply with this Policy, please contact the Corporate Compliance Office or amnealcompliance@amneal.com for assistance.

Reporting: If you are aware of a situation that you believe may be violating this policy or is otherwise unlawful or unethical, you must immediately contact a Corporate Compliance Office representative. The Corporate Compliance Office can also be reached at amnealcompliance@amneal.com. You can also call the Amneal Ethics & Compliance Hotline at 1-877-412-8817 24 hours a day. Calls can be made anonymously, except as otherwise required by law.

Discipline: If Amneal determines that any Amneal colleague or Covered Person has violated this policy, applicable laws or regulations, appropriate disciplinary measures will be taken. The following is a non-exhaustive list of possible disciplinary measures to which Amneal colleagues and Covered Persons may be subject: oral or written warning; suspension; removal of job duties/responsibilities or demotion; reduction in compensation; and termination of employment.

Amneal reserves the right to take whatever disciplinary measure(s) it determines in its sole discretion to be appropriate in any particular situation, including disclosure of the wrongdoing to government authorities. Nothing in this Policy changes the at-will nature of employment at Amneal, its affiliates or subsidiaries, where applicable. It is Amneal policy that there will be no retaliation for reports made in good faith.

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DOCUMENT HISTORY

Revision #	Revision History	Name	Date
2.0	Revised to adopt new corporate Policy format, and to address findings from 2016 and 2017 T&E audits.	Jon Dellaquila, Corporate Compliance	