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1.0 Purpose

The purpose of this Contractor Travel Expense Standard (Standard) is to provide clear guidelines and requirements of Ally Financial Inc. (AFI), and its direct and indirect subsidiaries (collectively, Ally) contract workers to achieve the following objectives and benefits:

- Clear definition of reimbursable vs. non-reimbursable travel expenses
- Proper reporting and approval of travel expenses
- Compliance with applicable legal requirements

Pursuant to the *Enterprise Risk Management Policy (ERM Policy)*, Ally shall manage risks within the limits and thresholds established in the *Enterprise Risk Appetite Statement* and the enterprise and specific risk limits recommended by Independent Risk Management (IRM) and approved by the AFI and Ally Bank Risk Committees (RCs). In addition, Ally shall maintain effective risk management through the key risk management processes described in the *ERM Policy*.

2.0 Scope

This Standard applies to all contractors and consultants with whom Ally has negotiated a formal contract for services. This includes reimbursement of travel related expenses for expenditures related to Ally business travel. This Standard does not apply to other expenditures (e.g., contract labor, contract fees) and supports the *Enterprise Travel & Entertainment Policy*.

This Standard must be read in conjunction with the *Ally Code of Conduct and Ethics*, the *ERM Policy*, and any governance documents referenced within this Standard.

3.0 Standard Requirements

Ally Managers are responsible for addressing travel related activity in procuring services from contracting or consulting Third Party, defining if travel expenses will be incurred, when/how reimbursement will take place, and any necessary reporting to Ally. Resulting decisions must be reflected in the contractual agreement with the Third Party.

Contractors/consultants must exercise sound business judgment when making business travel plans so that planned travel is appropriate and necessary. Contractors/consultants must consider the most cost-effective approach to achieve the intended business objectives.

The following requirements must be adhered to absent individual Third Party contractual agreements that contain more specific or stringent provisions.



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3.1 Arranging Travel

3.1.1 Manager Approval/Use of Designated Travel Providers

Prior to travel, contractor/consultants must provide an estimate of all travel related expenses for approval from their Ally Manager. The estimate includes but is not limited to airfare, lodging, meals, ground transportation, etc.

Contractors/consultants must contact their Ally Manager to have travel arranged on their behalf. See the Travel Services website on Ally's Pulse for more information.

Contractors/consultants may not use Ally-negotiated rates for their personal travel.

3.1.2 Exceptions

Travel by contractors/consultants should use Ally's designated travel providers to obtain Ally negotiated rates with Preferred Suppliers. Notwithstanding, if other rates equal to or less than Ally rates can be obtained via their employer, contractor/consultants may use their employer's source, but their corresponding Ally Manager must approve these situations prior to the contractor/consultant booking the travel. For additional information on Ally-negotiated rates, contact Ally Supply Chain Shared Services at Ally.P2PCustomerService@Ally.com.

If any travel is booked through non-designated travel providers, Ally retains the right to only reimburse expenses up to the amount of Ally-negotiated rates with its Preferred Suppliers. Any costs in excess of these rates must be absorbed by the contractor/consultant or their agency.

3.2 Air Travel

3.2.1 Domestic Travel Guidelines

The designated travel provider has been instructed to offer tickets with the Lowest Logical Fare.

- Lowest Logical Fare is defined as the lowest non-refundable fare available at the time of booking within three hours of the requested arrival/departure time. Lowest Logical Fare offerings include: alternative carriers (including low cost carriers), alternative airports, and routings with one connection between the origin and destination cities.



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- Contractors/consultants should accept the Lowest Logical Fare if business conditions allow. Coach and/or economy class must be used for all domestic travel. Upgrades may be made at the contractor/consultant's expense; more costly flights may not be booked simply to allow the contractor/consultant to take advantage of upgrade opportunities.

Advance airfare purchases often result in significant savings and must be made whenever possible. Typically, lowest cost airfare is available 14-21 days in advance of travel. Tickets purchased less than seven days in advance of travel require Ally Manager approval.

3.2.2 International Travel Guidelines

Business Class may be selected for international flights that are four (4) hours or longer in duration (flight time).

3.2.3 Frequent Flyer Programs

Frequent flyer program benefits may not influence flight selection or routing.

Upgrade certificates may be utilized for business travel as long as the resulting cost of travel does not exceed Ally's preferred or negotiated rate, or other available lower-cost alternatives.

Contractor/consultants may retain non-monetary rewards offered by airlines, hotels and car rental companies for their personal use. Cash rewards may not be retained and must be remitted to Ally.

Contractor/consultants are responsible for managing their own frequent flyer and preferred traveler memberships.

3.2.4 Extra Night Stay

An extra night stay is allowed, if it results in a significant reduction in the airfare and is pre-approved by their Ally Manager. As a rule, additional costs for lodging and meals must not exceed 50 percent of the savings in airfare, although in some cases additional costs will be allowed up to the full amount of the savings. Where additional expenses are claimed, the contractor/consultant must submit documentation to evidence the savings.



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3.2.5 Itinerary Changes

Additional charges resulting from late itinerary changes are allowed, if required for business reasons and pre-approved by the appropriate Ally Manager; otherwise, they must be paid by the contractor/consultant's agency.

3.2.6 Trip cancellation/credits

The contractor/consultant must work with their Ally Manager to notify Ally's online booking supplier in advance of trip cancellation.

Generally, unused tickets (both refundable and non-refundable) will remain valid for comparable travel for a period of one year. Contractor/consultants are responsible for utilizing any credits they have received for cancelled tickets for future Ally business travel.

3.2.7 Airline Ticket Billing/Payment

Airfare and agency transaction fees must be charged directly to the contractor/consultant or their agency and paid by the contractor/consultant's agency.

3.2.8 Registered Traveler and Airline Club Memberships

Fees paid for registered travelers or airline club memberships are not reimbursable business expenses.

3.2.9 Baggage Fees

Baggage fees charged by the airline in the normal course of travel are reimbursable. Excess baggage charges are reimbursable only if incurred due to business necessity.

3.2.10 Airline Compensation

Contractor/consultants may volunteer to receive airline compensation for relinquishing seats on over-booked flights only if they are traveling outside normal working hours and/or the trip delay will not result in an interruption or loss of, or adverse impact to, Ally's business.

3.2.11 Trip Insurance and Incidental Expenses

Airline trip insurance is not a reimbursable business expense, nor does Ally provide insurance coverage for non-employees.



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Incidental expenses (e.g., in-flight movies, refreshments, headsets) are not reimbursable.

3.2.12 In-Flight Internet Access

In-flight Internet access is reimbursable if a specific Ally business need necessitates access while in-flight.

3.3 Lodging and Meals

3.3.1 Booking Through Designated Travel Providers

All lodging or hotel reservations for business travel must be made through Ally's online booking tool, subject to Section 3.1.1 above. Contractors/consultants must contact their Ally Manager to have travel arranged on their behalf.

Contractors/consultants may not reserve lodging through non-authorized internet sites such as Hotels.com, Expedia, Travelocity, or direct hotel websites.

3.3.2 Room Rate and Category Guidelines

Contractor/consultants must work with their Ally Manager to book 'single' or comparable room categories. While rates will vary by travel destinations, contractors/consultants should book the lowest applicable hotel rate provided by the travel provider (e.g., Ally rate, AAA if member, "Best Available Rate").

Upgraded accommodations may be allowable under certain circumstances but must be approved by the appropriate Ally Manager prior to booking.

Contractor/consultants are responsible for ensuring the rate charged by the hotel matches the confirmed rate from the itinerary, for resolving any rate discrepancies, and for obtaining credits or refunds for excess charges.

3.3.3 Scheduling Changes and Cancellations

Contractor/consultants are required to work with their Ally Manager to notify Ally's online booking supplier of scheduling changes for travel in sufficient time to avoid penalties or other charges, so that hotel reservations and other arrangements can be changed.

Cancellation of a hotel reservation must be within the hotel's designated cancellation period to avoid 'no show' charges. Charges resulting from a cancellation must be paid by the contractor/consultant or agency unless the cancellation was necessary due to an Ally business requirement and notification within the hotel's cancellation period was not possible. A cancellation



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confirmation number must be obtained from the hotel to avoid disputes over improper charges.

3.3.4 Personal Meals

Reimbursement for the cost of personal meals for contractor/consultants traveling on business must not exceed \$125 per day. Contractor/consultants are responsible for any amount exceeding this limit. This limit applies whether the contractor/consultant is taking meals at his or her hotel or eating at restaurants outside the hotel.

For contractor/consultants traveling and taking meals together, each must pay for their own expenses.

3.3.5 Frequent Guest Programs and Hotel Clubs

Charges for frequent guest programs or hotel clubs (e.g., health and fitness) are not reimbursable.

3.3.6 Personal and Incidental Expenses

Personal care services and items (e.g., haircuts, newspapers, in-room movies) are not reimbursable and must be paid by the contractor/consultant. However, laundry charges are reimbursable for stays of over five consecutive days.

3.4 Ground Transportation

3.4.1 Vehicle Rental

Rental vehicles may be used when traveling only if the cost is less than utilizing taxis, trains, shuttles or other available ground transportation options, or if there is a business need which makes having a rental vehicle a necessity. Contractors/consultants must obtain the appropriate Ally Manager's approval, prior to booking a rental vehicle.

3.4.1.1 Use of Designated Travel Provider and Preferred Suppliers

Rental vehicle reservations for business travel must be made through the Ally Manager utilizing Ally's online booking tool and with a Preferred Supplier for car rentals, subject to Section 3.1.1.

For extended travel, vehicle rental agreements must be renewed every 15 days unless a more cost-effective monthly rate can be obtained.



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3.4.1.2 Vehicle Class

Contractor/consultants must work with their Ally Manager to book mid-sized or smaller vehicles when traveling. Upgraded vehicle classes are allowed if provided at no additional cost, or in the case of an approved business requirement.

3.4.1.3 Insurance

Ally does not provide insurance coverage to contractors/consultants, and incremental insurance costs are not reimbursable.

3.4.1.4 Refueling

Rental vehicles should be refueled prior to returning to avoid excessive fueling surcharges. Where special circumstances exist that do not permit refueling prior to return, comments explaining the situation must be clearly documented in the expense report.

3.4.1.5 Reporting Accidents

In the event of an accident involving a rental vehicle used for Ally business, the contractor/consultant must immediately notify the local police and obtain an official police report. The contractor/consultant must also immediately notify the car rental agency and advise as to the extent of the damage.

If the rental vehicle is unsafe or immobile, the contractor/consultant must request the car rental agency provide a replacement vehicle and arrange for removal of the disabled vehicle.

Ally Corporate Insurance must be contacted by the contractor/consultant as soon as reasonably practical to provide guidance on these situations.

3.4.1.6 Non-Reimbursable Expenses

Membership fees for preferred customer car rental programs are not a reimbursable business expense and must be paid for by the contractor/consultant.



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3.4.2 Use of Personal Car

3.4.2.1 Mileage Reimbursement Allowed

Contractors/consultants who use their personal vehicles for Ally business are reimbursed for mileage, parking, and tolls in excess of their normal commute. The origin and destination of the trip for mileage and toll reimbursement must be documented. Mileage reimbursement rates include both gasoline and vehicle maintenance related to business use of personal vehicles. Ally uses the IRS-prescribed standard mileage rate for mileage reimbursement which can be located on the IRS website and is updated annually.

Mileage reimbursement is not allowed for normal work commute, although reimbursement will be allowed for any miles driven for business in excess of normal commute miles calculated on a daily basis.

3.4.2.2 Driving in Lieu of Flying

Contractor/consultants may elect to drive rather than fly when traveling on company business; however, the mileage reimbursement for driving and any other associated costs may not exceed the amount that the traveler would have incurred flying.

3.4.3 Other Ground Transportation

When selecting a mode of transportation to use while traveling on company business, contractor/consultants must consider all options (e.g., taxi, rideshare, shuttle, rental car) and select the option that is most economical and appropriate given the circumstances.

3.4.3.1 Parking Fees and Tolls

Actual and reasonable parking fees and road and/or bridge tolls are reimbursable business expenses. Expenses for parking at a contractor's/consultant's normal work location or for tolls incurred during the daily commute are not reimbursable as business expenses.

Fines resulting from parking or toll violations are not reimbursable.



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3.5 Telecommunications

3.5.1 Telephone / Internet Expenses While Traveling

Telephone and faxing expenses for Ally business purposes during business travel are reimbursable. Contractors/consultants should utilize their corporate mobile phones rather than hotel phones to achieve the most favorable calling rates.

Charges for internet connectivity used in conducting Ally business while traveling are also reimbursable.

When traveling internationally, contractors/consultants must arrange an international telecommunication plan for their cell phone or other communication device for the time period of the travel to keep the cost to minimum.

3.5.2 Audio/Web/Video Conferencing

Whenever possible, audio/web/video conferencing must be utilized in lieu of travel.

Video and web conferencing services (e.g., Zoom, Teams) are also available at most Ally locations.

Contact end-user computing (EUC) for more information.

3.6 International Travel

3.6.1 Customs and Duties

Customs and duties charges are reimbursable only when levied on company material or property. Contractors/consultants must include an explanation of the charges on their expense report.

3.6.2 Value Added Tax (VAT) and Goods & Service Tax (GST) Reclaim

VAT may be reclaimed for certain business expenses incurred overseas. Ally submits applications for VAT refunds periodically. Contractors/consultants must submit all receipts that include VAT, even if those receipts would not normally meet the \$50 receipt requirements. Similarly, GST may also be reclaimed for certain business expenses incurred in Canada and contractors/consultants must submit all receipts that include GST.



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3.6.3 Converting Foreign Currencies

The contractor/consultant must record all expenses and totals on the expense report in the local reporting currency. If foreign currency conversion is involved, the contractor/consultant must document the currency type and exchange rate on the expense report.

3.6.4 Immunization

Immunization costs will be reimbursed for contractors/consultants traveling to countries with specific requirements. Contractors/consultants must consult the travel provider before traveling to determine those requirements and obtain the appropriate Ally Manager's approval.

3.7 Non-Reimbursable Expenses

Examples of non-reimbursable expenses are:

Travel

- Car rental insurance
- Personal accident and/or property insurance
- Optional travel and/or baggage insurance
- Traffic tickets
- Membership (or club) fees for airline or car rental programs
- TSA Pre-Check (Trusted Traveler Programs)
- Incidental airline expenses (in-flight movies, refreshments, headsets)
- Valet Parking (excluding mandatory hotel valet)
- Laundry (if travel was not more than 5 consecutive days)

Incidentals

- Souvenirs and/or personal gifts
- Personal toiletries
- Shoeshine
- Clothing
- Personal entertainment (sporting events, movies, magazines, paid television)
- Golf fees (when not part of business entertainment approved in accordance with this policy)
- Expenses related to vacation or personal days while on a business trip)
- Luggage and briefcases



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- Pet kenneling
- Loss and/or theft of personal funds or property

Technology

- Computer hardware and software
- Online software, user license(s) or subscription service
- Office equipment (excluding employees designated as Work from Home)

Subscriptions/Memberships

- Meal delivery subscription services (i.e. Dashpass, Grubhub Plus, etc.)
- Amazon Prime subscription
- Wholesale club annual memberships (i.e. Costco, BJ's, Sams Club)
- Memberships for flower retailers

3.8 Reimbursement of Expenses

3.8.1 Payment

Contractors'/consultants' travel expenses must be paid out-of-pocket or by their employer, and then an invoice must be submitted to Ally for reimbursement.

For infrequent travel, travel arrangements for airfare, lodging, or car rentals can be charged to the approving Ally Manager's corporate credit card.

3.8.2 Submitting Expenses

For non-employee (contractor/SOW) workers represented in Coupa Contingent Workforce (CCW), they must complete expense reports in CCW and attach related receipts.

For non-CCW vendors, travel expense invoices are required to be submitted to a valid Ally PO. Invoices must be represented in a consistent format and provide sufficient detail on each expense category. Ally may require vendors to complete separate reporting if numerous contractors/consultants are represented and/or travel is frequent. Separate reporting must include detailed summaries by person, by category that ties to invoice detail.

Receipts for any expense \$50 or greater may be requested by Ally for review and should be should be retained for a period of 7 years. Receipts must show the date,



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the name, and location of the vendor, and the total amount of the expense. A statement from a credit card will not suffice as a receipt.

Contractors/consultants are required to submit travel expenses at least once per month but are encouraged to prepare and submit travel expense invoices more frequently as circumstances necessitate (e.g., after each trip).

3.8.3 Reimbursement of Expenses

Travel expense reimbursements are made directly to Ally's supplier and the supplier will reimburse their employee for the travel expenses. It is not Ally's standard process to reimburse contractors directly for travel related expenses.

Non-compliance with this Standard may require a refund by the contractor/consultant or vendor to Ally of previously paid amounts.

3.9 Gifts

Generally, contractors are not to accept gifts from Ally employees or anyone who may seek to influence Ally's business decisions. Further information can be found in the Ally Code of Conduct and Ethics.

4.0 Roles and Responsibilities

In conjunction with the *Enterprise Travel and Entertainment Policy*, this Standard establishes the following roles and responsibilities for BLs in support of this Standard.

4.1 Contractor/Consultant

As described or contemplated elsewhere in this Standard, contractors/consultants working on Ally's behalf are responsible for complying with this Standard and all applicable laws. These individuals are responsible for timely preparation and submission of proper expense reports for all business travel. All submitted expenses must have a legitimate business purpose.

4.2 Ally Manager

It is the responsibility of Ally Managers and/or their approver delegates to assure that contractors/consultants are aware of the policies governing company travel as described in this Standard. Ally Managers and/or their approver delegates are expected to provide review and approvals as well as support any oversight and monitoring processes. Ally



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Managers are responsible for responding to and enforcing compliance with this Standard and requiring that contractor/consultants file necessary expense reports on time.

4.3 Travel and Entertainment (T&E)

As described in the *Enterprise Travel and Entertainment Policy*, Travel and Entertainment (T&E), is responsible for the management and oversight of all travel related policies, standards and procedures.

As described or contemplated elsewhere in the Policy, T&E is also responsible for:

- Monitoring for adherence to policies through established expense report system controls and audits of expense reports prior to payment.
- Administration and oversight of Ally's third-party Travel Management Company (e.g., travel booking, airline, hotel, car or limo contracts, etc.).
- Administration, oversight, monitoring and reporting of Ally's third-party company Corporate Card Provider.
- Administration, oversight, monitoring and reporting of Ally's third-party Work-Related Vehicles Management company

5.0 Accountability and Monitoring

This Standard must be reviewed and approved annually by the Chief Procurement Officer. Interim reviews may be triggered by the Chief Procurement Officer, including as a result of material changes in corporate strategy, the regulatory environment, or financial conditions.

Ally employees who sponsor contractors will monitor adherence to this Standard by/through validating travel plans and receipts before approving invoices and/or timecards.

6.0 Communication

The Chief Procurement Officer, or designee, will communicate any changes to this Standard to impacted parties before the effective date of such changes. This Standard and any updates to it will be accessible on the Governance Document Library page on the Ally Pulse website. Communication and training for this Standard will be by notification only.



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7.0 Standards Exceptions and Non-Compliance

The exception and escalation protocol for this Standard must follow the same exception and escalation requirements described in the *Enterprise Travel and Entertainment Policy*.

Requests for exceptions to this Standard must be submitted to and approved by the Chief Procurement Officer and Enterprise Policy and Governance (EPG). Approved exceptions will be evaluated by the Chief Procurement Officer against the requirements of the *Enterprise Issue Management Policy*.

Any person who discovers a potential instance of non-compliance with this Standard can report it to any of the following: their manager, EPG, the Chief Procurement Officer, the applicable BL Leader, Enterprise Compliance and Regulatory Affairs (ECRA), the AFI General Counsel, the Ally Chief Risk Officer (CRO), the AFI Chief Human Resources Officer (CHRO), or through the Ally Ethics Hotline. Ally prohibits retaliation of any kind against a person who honestly reports potential non-compliance.

The Chief Procurement Officer must report any identified instances of material non-compliance with this Standard to EPG, which are not already reported through other established channels (e.g., Issue management reporting). These matters may be further reported, including to the Chief Procurement Officer, ERM, and RCs, as prescribed by the *Enterprise Policy on Governance Documents*

Ally employees found to be in violation of a Standard may face disciplinary actions, up to recoupment of existing or past compensation awards and termination of employment.

8.0 Appendices

Appendix I. Definitions

Definitions of commonly used terms in this Standard are included in the Enterprise Glossary on the Ally Pulse website. Definitions of significant terms specific to this Standard are listed below:

Ally Manager – Ally representative responsible for overseeing the work of the contractor/consultant.

Coupa – 3rd party Spend Management platform for managing Ally’s temporary staffing needs, end-to-end procurement and payment activities.

Preferred Supplier - Vendors offering special negotiated rates for Ally employees and non-employee travelers.



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Third Party - Any entity that has entered into a contractual relationship with Ally to provide goods or services.



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Appendix II. Related Governance Documents

The governance documents listed below may be in varying stages of publication and implementation and are found in the Governance Documents Library on the Ally Pulse website.

- Ally Code of Conduct and Ethics
- Enterprise Issue Management Policy
- Enterprise Policy on Governance Documents
- Enterprise Risk Appetite Standard
- Enterprise Risk Management Policy
- Enterprise Risk Management Roles and Responsibilities Standard
- Enterprise Travel and Entertainment Policy

Appendix III. Revision and Approval History



Contractor Travel
Expense Standard R



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Appendix IV. Acknowledgement of Review and Approval

Name of
Standard: Contractor Travel Expense Standard

☒ Lauren Smith 04/08/2025
Reviewed Compliance Date

☒ Nicole Lipscomb 03/28/2025
Reviewed Standard Owner Date

Typing your name and date serves as your official acknowledgement that the above areas have reviewed this Standard.

Michael Ferranti 03/27/2025
Standard Author Date

☒ Nicole Lipscomb 03/28/2025
Approved Approval Authority Date

Implementation Plan Communicated (Will Ally comply by the Effective Date of this Standard?) If no, enter comments, including the date that the Standard is expected to be fully implemented.

<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Yes</u>	<u>No</u>