



TRAVEL POLICY

A Human Resources Publication

Last Update: October 16, 2017

Version 2.0

Locations: Americas, EMEA, Russia & APJ

Dear Acronis Staff,

The purpose of this publication is to set forth policy and procedures, which must be followed when traveling and making travel arrangements.

We rely on every employee to closely monitor expenditures and make every effort to book in advance.

The company may use consolidated travel and accommodation solutions to facilitate business travel and optimize travel costs.

As a growing company we rely on your feedback and request that any ideas or concerns be directed to the Human Resources Department.

Sincerely,

Acronis Executive Team

PREFACE

Acronis (“Acronis”) endeavors to make business travel safe, economical, efficient, convenient and comfortable. Travel shall be undertaken only when ordinary business communications are not sufficient to accomplish the business mission. All travelers and authorizers are expected to actively question the need for travel and consider other communications alternatives. All managers, department heads and executives are responsible for implementing and ensuring adherence with this policy within their respective departments.

Travel arrangements should be made with as much advance notice as possible. Airfare, rental car and hotel rates typically increase at intervals of less than 21, 14 or 7-day advance notice. Last minute travel that exceeds limits set forth in this policy may not be approved. Travelers must prepare an email to their supervisor with the relevant details of the travel plan including purpose for the visit, customer name, meeting dates and times, hotel locations, rental car requirements, etc., should the itinerary exceed limits outlined herein. It is the traveler’s responsibility to ensure travel itineraries are correct prior to booking.

Acronis may revise and amend approval flows as business requirements may change.

This policy applies to all Acronis employees.

Abuse of this policy, including falsifying documents, may be grounds for discipline action, up to and including termination of employment.

Local HR will provide you with country specific limitations such as per diem and/or other allowances that may be set by local law in a local addendum.

EMPLOYEE ACKNOWLEDGEMENT AND RECEIPT

The Travel Policy and local addendums describe important information about Acronis, and I understand that I should consult my manager or the Human Resources Department regarding any questions not answered in the policy.

Since the information and policies described here are necessarily subject to change, I acknowledge that revisions to the policy may occur, from time to time. I understand that revised information may supersede, modify, or eliminate existing policies and that I should refer to the official Travel Policy posted online by the company on a regular basis. I also understand that I must refer to my local country policy addendum where applicable.

Furthermore, I acknowledge that this policy is not a contract of employment.

I understand how to locate this policy and will refer to it regularly. I understand that it is my responsibility to read and comply with the policies contained in this policy, local addendums and its revisions.

EMPLOYEE'S NAME (printed): Ong Ming Hao

EMPLOYEE'S SIGNATURE: _____

DATE: _____

**** * PRINT THIS PAGE, SIGN AND RETURN TO H R. ELECTRONIC***

SIGNATURES OK. * *

1.1 TRAVEL BASICS

It is imperative Acronis be able to reach travelers at all times during a business trip. The authorized specialist will pull your travel information from travel agency's website as needed. All changes made through the travel agency will be reflected automatically. Should you rebooked last minute by the airline or relocated by a hotel, please send an email promptly to your local HR with the new travel details.

Employees are responsible for making sure that they comply will all travel requirements, including arrangement of business visas either independently or via administrative support personnel. Timely provision of accurate information as well as all relevant documentation is the responsibility of the employee planning their travel. Failure to comply with this requirement will result in disciplinary action, up to and including termination of employment.

1.2 TRAVEL PREPARATION

Prior to the trip being priced, the trip and trip purpose (including anticipated cost) **MUST be approved by the VP or Director under whom travel is required.** This should happen prior to contacting the travel agency. Email request and approval is ok.

If the priced airfare for the trip exceeds USD \$600, or equivalent in local currency, for domestic (your region) or USD \$2,000, or equivalent in local currency, for international (outside your region), only HR can give final authorization to travel agency to "ticket" the travel. No exceptions. The travel agency will contact HR directly for ticket approval over these amounts. HR will validate details with the manager and then authorize with the agency or contact the employee if denied.

All travel must be booked through our dedicated travel agency, no exceptions. Travel booked outside the dedicated travel agency may not be reimbursed.

1.3 VISAS

It is the responsibility of the employee to determine in advance of booking foreign travel that he or she will have sufficient time to obtain any visa legally required to gain entry to the destination country. Employees must obtain business visas and business visas of the right class to travel to foreign countries on Acronis business where the law of destination country requires such visas. Acronis business includes attending seminars, conferences and marketing events. No employees may travel outside his or her home country on Acronis business on a tourist visa. Usually, visas are available from the destination country's local consulate in the employee's home country. Some countries will require

you to purchase a visa on arrival however. Immigration requirements and the penalties for non-compliance vary from country to country and ignorance is not a defense. If you need help with your visa, please consult with the regional HR manager.

Consistent with the Acronis Code of Conduct that is accepted by every employee when he or she joins the company, each employee is required to be truthful in all visa applications and to comply with the law of the destination of the country in obtaining the proper visa. Failure to comply with this policy is grounds for disciplinary action up to and including termination.

2.1 AIR TRAVEL

Air travel is allowed on commercial airlines only. Business travel on privately owned aircraft is not allowed and will not be reimbursed. Acronis employees are prohibited from operating aircraft in the course of business travel, whether as a pilot or crewmember.

The travel agency will book the lowest logical commercial airfare (the most inexpensive airfare available at the time of booking, dependent on fare availability and logical routing/stops) taking advantage of fares with cancellation penalties and non-refundable Clauses. Reporting tools will show the fares searched at the time of booking for auditing expense reports.

Frequent Flyer mileage may be retained by and used at the discretion of the employee. Obtaining additional Frequent Flyer mileage and associated benefits must not be considered when planning or booking travel.

All domestic and international travel will be arranged in the coach/main cabin. Employees may request specific fare classes for upgrade eligibility on Domestic/regional & international flights over 5 hours so long as the upgradable fare is less than additional \$200 for domestic/regional and \$350 for international flights (over 5 hours) from the logical economy fare. Please note that most upgrades are based on higher paying passenger priority and may not be available at departure. The travel agency will make every effort possible to assist you in listing for upgrades, but cannot guarantee an upgrade.

Employees may choose to fly their preferred carrier when the fare exceeds these limits of the lowest logical fare by notifying local HR before booking and having the difference of the two fares deducted from their expense reports or payroll. If an employee chooses to upgrade to a seat outside this policy all associated cost is the responsibility of the employee and will not be reimbursed. CEO direct reports (Exhibit A) may fly business class for long-haul international travel (5 hours or more).

Employees must communicate with the travel agency immediately when flights are missed or otherwise not taken. Some airlines do not allow a credit if they are not notified of a cancellation or missed flight before departure time.

Acronis will not pay for employee membership in airline/airport clubs.

It is the employee's responsibility to ensure the travel details are correct prior to booking. Any changes due to lack of attention to detail on the employee's behalf will not be paid by the company and may be deducted from expense reports.

2.2 AUTOMOBILE RENTAL

The grade of rental car allowed will be "Intermediate". If three or more employees are sharing the same car, a "mid-size" upgrade up will be allowed.

Autos rented on behalf of Acronis for the purpose of conducting company business are covered under Acronis' corporate auto liability insurance policy within the USA, so it is NOT necessary to accept the additional insurance in the USA. Any Acronis employee renting a car outside of the USA must elect insurance coverage for each rental. Acronis' corporate auto liability insurance policy will not apply to personal use of the vehicle under any circumstance.

Any employee with a company car, car allowance or required use of personal car should check with local HR for your specific situation.

If an accident should occur in a vehicle rented for Acronis business, once any medical issues are attended to, the accident should be reported to the appropriate law enforcement agency, the applicable car Rental Company and HR.

Except navigation systems, extra perks such as class upgrades and other non-typical equipment are not reimbursable and such costs will be deducted from expense reports. Employees MUST fuel the rental car prior to returning to ensure the lowest fuel charge.

Unauthorized rentals will not be reimbursed.

2.3 HOTEL ACCOMMODATIONS

Hotel reservations shall be made through the travel agency to achieve maximum benefit of Acronis' and the travel agency's best-negotiated rates.

Acronis' accommodation standard is a single room per traveler. Since the cost of lodging will vary by geographic area, Acronis will require that the amount be reasonable in

comparison to the rates for other standard accommodations within that area. **Hotels Must not exceed USD \$250, or equivalent in local currency, conditional on the direct manager's approval.** If you are unable to find a hotel within the rate at your destination, notify HR via email at time of booking to ensure there are no issues with your reimbursement.

If the business activity is within driving distance of the employee's home, and mileage reimbursement will be less than the cost of the hotel, then reimbursement for hotel charges will be disallowed unless there is a safety or practicality issue that can be substantiated.

3.1 DURING THE TRIP

All changes to travel itineraries en-route must be made through the agency. Any changes that will add more than \$300, or equivalent in local currency, to the cost of the airfare must be re-approved by the appropriate Department Head, VP, Director or HR prior to booking. For urgent after-hours or otherwise dire situations, the traveler may make arrangements directly with the travel agency (see contact info on page 4). Reimbursement of tickets/hotels/cars not made through the designated travel agency will require HR approval.

Acronis must be able to reach the traveler at all times during the business trip. Any changed or supplemental information (i.e., lodging or itinerary changes) from the traveler **MUST** be communicated to local HR.

3.2 MEALS

It is Acronis' policy to reimburse daily meal expenditures incurred while traveling through a per-diem or actual cost reimbursement. Receipts may or may not be required under your per-diem system, check your local addendum for more details.

Alcohol will not be reimbursed unless ordered during a customer visit or dinner with customer.

A list of cities where "actual" expenses may be reimbursed is attached hereto as "Exhibit B" and this list is subject to change. Per Diems will be set by country. See local HR for more information as some countries have specific laws that may impact you.

3.3 BUSINESS MEALS AND ENTERTAINMENT EXPENSES

Business meals must involve the active discussion of Acronis business. The discussion objective must be the ultimate generation of revenues, the reduction of costs or expenses, some other quantifiable business benefit, or recruitment. The topic of the business discussion, names and titles of those in attendance, and the name of the company represented must be listed on the expense form, and the applicable actual receipt must be attached. Receipt must include meal detail and credit card approval slip when a credit card is used for payment. Credit card approval slip without detail will not be acceptable for reimbursement. Meals between employees of Acronis will be scrutinized and may require an additional statement as to why the discussion could not take place during normal business hours or in the office.

Management should keep lunch or dinner with staff to a reasonable cost and frequency.

Alcohol will only be reimbursed with clients/customers/partners and should not be excessive. Staff reimbursement of alcohol will only be considered for special occasions (recognition, celebration, etc.) and not “normal” business meals.

Any employee(s) found submitting “duplicate” reimbursements may not be reimbursed for the given item and may be placed on probation or terminated. Example: On a travel day when an employee attends a business meal paid for by another party, or meals are supplied by Acronis, no per diem for that meal should be submitted by either employee.

Expense reports must include a detailed food receipt for all group meals along with the credit card payment receipt. Signed credit card only receipt is not sufficient.

Personal entertainment for employees is not reimbursable, including pay-for-view or video rentals in hotel rooms. Family traveling with employees may not be submitted for reimbursement.

3.4 USE OF PERSONAL VEHICLE

The business use of an employee’s personal auto will be reimbursed at the rate allowed by the local government. If an employee decides to drive to a business meeting ~~instead~~ of flying on a commercial airline, the total reimbursement requested should not exceed the lowest logical airfare for that particular destination. When the business trip Originates from the employee’s home, the mileage to be used in the calculation of reimbursable expense must be net of the miles normally driven in the employee’s commute to the workplace.

Employees who use their personal automobiles are expected to be in compliance with statutory insurance regulations and requirements. Employees are responsible for traffic citations, parking tickets or any other violations that occur when using their personal automobiles or rentals for Acronis business.

3.5 OTHER GROUND TRANSPORT EXPENSE

The use of taxis, airport limo, or shuttle services shall be reimbursable only when they are the most practical and economical method of transportation. The use of free hotel shuttles or public transit is strongly encouraged. Parking and toll charges are also reimbursable; the use of remote parking facilities is encouraged whenever practical and safe. Employees should use good judgment and not rent cars just to get between the airport and a downtown hotel location where parking will be expensive and the car is not otherwise needed.

Original receipts are required to substantiate ALL such expenses. Blank taxi receipts will NOT be reimbursed. Expense reports must be completed in entirety.

3.6 TELEPHONE, FAX & INTERNET EXPENSES

Employees will be reimbursed for business and reasonable telephone/fax costs and internet usage incurred while traveling with sufficient documentation and substantiation of purpose.

- Billing phone calls to the hotel room is generally very expensive and should be avoided. Use VOIP or other less expensive options where possible. If you are calling an Acronis location, have the local office call you back at the hotel.
- “Reasonable” personal calls are deemed to include one phone call home per day while on the road unless there are mitigating circumstances requiring additional communication.
- Sending or receiving faxes at a hotel is generally very expensive. Check the local rates before doing this.
- Acronis will not reimburse destination rentals of cellular phones.
- Internet usage at a hotel or other facilities should be used at a minimum. Please note price increments (typically per hour, minute, day or 24-hour period). Approval of excessive charges is at the discretion of the department

head. This policy does not guarantee payment for expenses deemed excessive.

- Cell phone usage should be kept to a reasonable amount when roaming. Connect to hotspots whenever possible and avoid using data and minutes whenever possible overseas.

3.7 LAUNDRY/OTHER

Reasonable and necessary laundry and other expenses will be reimbursed if the travel time is for five (5) or more consecutive nights. An original receipt is required to substantiate the expense.

3.8 GENERAL TRAVEL EXPENSES

Employees will be reimbursed for all ordinary and necessary expenses incurred for legitimate business purposes upon submission of an approved expense report for trips. Expenses must be documented in sufficient detail to clearly show the business purpose, date and place, and nature of expense.

Expenses pre-paid by Acronis (typically airfare) should be shown as a “company prepaid” expense on the report and deducted from the amount owed to the employee by Acronis. Original receipts & travel agency itinerary is required for all expenses except per diems (as discussed above).

The VP or Director of the department being charged for the trip must approve travel expense reports. It is the responsibility of the approver to ensure that all charges are reasonable and necessary and are in accordance with this policy. Expense reports will be audited for compliance hereto by Accounts Payable and HR. The head of local Finance or HR may disallow any expenses not in accordance with this policy. Domestic ATM fees are not reimbursable.

To be eligible for reimbursement, all expense reports must be submitted within Two weeks of the end of the related trip, or end date of the related billing cycle. Expenses not submitted within 90 days after the date of the trip/occurrence, will become the responsibility of the employee. All expense reports including travel must include a copy of the travel itinerary (original and changes).

3.9 UNEXPECTED TRAVEL ISSUES

All unexpected travel issues will be dealt with on a case-by-case basis between the employee, the department head and HR .

Exhibit A

Acronis

List of Approvers

- Serguei Beloussov – CEO
- Eugenio Ferrante – Chief of Staff
- James Tucker Bradley – General Counsel
- Stanislav Protassov – SVP
- Jan Jaap Jager – CRO
- John Zanni – President
- Gaidar Magdanurov – CMO
- Nikolay Grebennikov – VP, Engineering
- Igor Zolotaryev - VPHR
- Local/Global HR
- Regional Head of Finance

EXCEPTION:

In the event that one of the above approvers is not available the next level of management may approve.