DeVry | Education Group

Travel and Expense Policy, with Safety & Security Guidelines

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1 | INTRODUCTION

This policy provides guidelines for reimbursement of travel and business expenses to colleagues, adjunct faculty and instructors of DeVry Education Group (the "organization" or "DVG") in performing their assigned responsibilities. Additionally, it addresses topics that may arise before, during, and after your travel. Whether you are traveling for the first time or already consider yourself a seasoned traveler, DVG wants to ensure that you are well prepared for the experience.

2 | AWARENESS AND SAFETY

TAKING PERSONAL RESPONSIBILITY

Safety and security depend to a large degree on being well prepared, adhering to the guidance you are given, and remaining vigilant. Here are some essential guidelines to ensure your safety and security while traveling on business for DVG:

- Keep abreast of local news. Do not get involved in protests, rallies, or demonstrations.
- Keep expensive electronic devices out of view as much as possible to prevent theft.
- Report to the responsible authority any suspicious persons loitering around residential or instructional facilities or following you. Keep your residence area locked.
- **Do not leave important or sensitive information in your hotel room and/or vehicle.** Use common sense in divulging information to strangers.
- Whenever possible, make reservations at a hotel before you arrive in a city. Check a map before you leave so you know where you are going. Looking lost or confused or holding a map can make you an easy target.
- Be careful when using ATMs and avoid using them in isolated places or at times when you are alone. Be cautious in accessing financial/banking online as the internet protocols abroad **are not** secure and cannot be trusted. These simple steps can help reduce the risk of being a victim of identity theft abroad.
- Be cautious not to impair your judgment through excessive consumption of alcohol.
- Safety in numbers is a good idea wherever you are. Always be aware of your surroundings and property especially when traveling alone.
- **Do not accept help from people waiting** around at the airport exit gate or peddlers. Arrange for airport pick-up ahead of time and be informed about the public transportation options prior to arrival. If you plan to take a taxi, find the official airport taxi stand. Keep the taxi phone number handy throughout your trip.
- When traveling, **leave an itinerary** with your manager, a close family member and/or a friend.
- Travelers can be susceptible to scams. **Do not give strangers personal information or money**.
- Thieves often strike when people are distracted. When making a phone call, texting, eating at a restaurant, checking a train schedule, or reading a map, stay aware of where you are and always keep your property in your line of vision or in hand.
- When traveling, keep your laptop with you at all times; never pack it away with checked luggage. Always keep
 it close to you, in front of you or underneath your seat. It is your responsibility to ensure all updates on your
 DVG-issued laptop are current. Make sure your data is backed up.
- If your equipment is less than six months old (camera, cell phone, iPad etc.) have the receipts with you or register these items with U.S. Customs before you leave to avoid the possibility of paying a duty.
- Additional information is available at the official Department of Homeland Security Official site for pertinent travel safety guidelines: http://www.tsa.gov/traveler-information

PURPOSE

DVG recognizes that travel and business expenses are an integral part of our business. With this in mind, every colleague should make a maximum effort to contain costs while carrying out their responsibilities. As such, colleagues must exercise sound business judgment and common sense in planning business travel and incurring business expenses. This policy is not intended to cover routine purchases (i.e. office supplies) and contains sections for both reimbursed and non-reimbursed expenses. These lists are not intended to be comprehensive. Should there be questions or further clarifications please contact the appropriate individual listed in the Expense Policy Questions & Clarifications Section of this document.

RESPONSIBILITY FOR EXPENSE REPORT PREPARATION AND APPROVAL

Regardless of who prepares and enters the expense data, each colleague reporting the expenses must review the report for accuracy and is ultimately responsible for the data submitted and for submitting receipts. Managers are required to thoroughly review the expense report to ensure that all expenses submitted for reimbursement are in compliance with DVG policy. Any individual submitting a false or fraudulent expense report will be subject to disciplinary action, up to and including termination. DVG reserves the right to recoup any money paid due to a false or fraudulent expense report submission.

It is important that expenses be charged to the correct department and expense account numbers, as incorrect coding will delay expense report processing. A listing of commonly used account numbers is included at the end of this policy.

The expense report must be reviewed and approved via the colleague's supervisor. Expense reports that are not approved by the supervisor will be returned to the colleague.

The Vice President of Finance & CAO will review and approve the expense submissions of the Leadership Council members. Only approved designees, i.e. Executive Assistants, can prepare expense reports.

A separate policy for the Board of Directors' expenses is maintained/and monitored by the VP of Finance & CAO and is on file with the DVG Controller.

COMPLIANCE

All expenses must be reasonable and appropriate. Expenses submitted for reimbursement are subject to audit by the DVG Disbursements Department, DEM expense report processing team, DVG Audit Services, and the Internal Revenue Service.

REPORTING EXPENSES

When more than one colleague participates in a business activity, the individual at the highest level of authority is expected to incur and report the expense. It is inappropriate for the senior member to have an individual at a lower level of authority report the expense and the individual at a higher level of authority authorize the expense when both participated in the activity.

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CASH ADVANCES

The organization does not provide cash advances unless extenuating circumstances justify an advance. When a cash advance is warranted, the advance should be signed by the appropriate department Vice President or Campus President. Expense reports should be filed within thirty calendar days of completing the trip. Any unused advance must be repaid at the submission of the expense report.

SUBMISSION OF EXPENSE REPORTS AND METHOD OF REIMBURSEMENT

Travel and business expenses are to be reported in detail via ExpenseWire. All entries are to be itemized and described in sufficient detail to make the report self-explanatory. If two or more colleagues are traveling together, each must separately account for his/her expenses to the extent practical.

Colleagues must report expenses within 30 days of the date incurred. Failure to report expenses within 30 days of the date incurred may result in the denial of reimbursement. Colleagues are eligible to submit a reimbursement request once they incur a reimbursable expense.

Colleagues are responsible for scanning and electronically attaching their receipts to expense reports. Colleagues at remote sites who may not have the ability to scan receipts are required to provide their manager with paper copies to facilitate a thorough review and final approval of their expense report.

An expense reimbursement generally occurs within seven business days, and will be directly deposited into the individual's designated bank account if the colleague has elected direct deposit or via check from the DVG Disbursements Department. Refunds received from vendors or suppliers for expenses previously reimbursed must be reported as negative amounts on the expense reimbursement form and credited to the same account code as originally charged.

SUBSTANTIATION OF BUSINESS EXPENSES

For a deduction to be allowed as a business expense under Internal Revenue Service requirements, an individual must substantiate the following:

- Amount of the expense
- Date and place incurred
- Names and titles of others attending (i.e., Jane Smith, CEO ABC Company)
- Business purpose of the expense (i.e., discussion of academic accreditation). "lunch/dinner meeting" or "business meeting" are examples of unacceptable business purpose.

Colleagues must document the above information (including vendors) in the fields provided on the expense reimbursement report.

RECEIPT REQUIREMENTS

Receipts are required for all expenditures of \$25 or more (scanned/facsimile submissions are acceptable). Electronic receipts (e-receipts) may also be submitted. Various small expenditures under \$25 should not be aggregated and reported as one item on the expense reimbursement report. Itemized receipts are required for the reimbursement of meals greater than \$75.

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When expenditure is unusual in type or amount, an explanation should be included on the expense reimbursement report. Reasonable requests for additional documentation may be made for expenses at management's discretion.

INSUFFICIENT DOCUMENTATION

A monthly statement (e.g., credit card statement) is not an acceptable alternative for a receipt when such receipt would normally be available. In instances when a paper receipt is lost or is otherwise unavailable, a written statement of the business purpose of the expense may be accepted.

CREDIT CARDS AND PERSONAL EXPENSES ON BUSINESS CREDIT CARDS

DVG will not reimburse travelers for the annual fee on personal credit cards. Personal credit cards are required to guarantee hotel reservations, pay for hotel and other travel expenses such as meals and ground transportation. All approved expenses charged on a personal credit card will be reimbursed via ExpenseWire. Airline tickets will be paid directly by the organization and are not to be charged to a personal credit card.

It is the traveler's responsibility to identify personal travel attached to business travel during the booking process with TSI/BEST. If the variance of the airline charge is \$25.00 or less, there is no need to reimburse DVG. If the variance of the airline charge is greater than \$25.00, TSI/BEST will charge the traveler's personal credit card for the variance.

DVG will not reimburse travel and entertainment expenses incurred by the spouse or other individual accompanying a colleague on business unless it is approved by an institution Vice President or higher.

When attached to business travel, additional non-business related days should be considered as the colleague's personal allotted holiday/vacation. Expenses for these personal, non-business-related days will be at the personal expense of the colleague.

TRAVEL AND BUSINESS EXPENSES WITHOUT AN OVERNIGHT STAY

Colleagues are reimbursed for reasonable expenses when they are required to work significantly beyond their normally scheduled hours or on Saturdays, Sundays, or holidays, when these days are not normally scheduled workdays. Additionally, expenses for traveling distances during an individual's workday greater than the normal roundtrip distance between home and office will be reimbursed. Effective Jan 1, 2014, mileage is reimbursed at the rate of \$0.56 per mile for U.S. based colleagues.

Reimbursable Expenses

The organization reimburses the additional costs that each colleague incurs as follows:

- If a colleague's commute to a work related location is farther than the normal commute to the colleague's office, the additional miles driven or the additional cost of public transportation are reimbursable.
- If a colleague must travel between the office and one or more work related location, and incurs costs (or mileage) in excess of his or her normal commuting costs, the additional costs are reimbursable.
- Parking fees or tolls in excess of normal commuting costs are reimbursable.

- If a colleague must work on a Saturday, Sunday, or holiday and it is not a regularly scheduled workday for the individual, the round-trip mileage from home to the office or work related location is reimbursable. The additional costs of any related parking and tolls or for the cost of public transportation to and from the office or work related location are also reimbursable (does not include allocated monthly parking/transportation costs).
- If a colleague must work five or more hours on a Saturday, Sunday, or holiday and it is not a regularly scheduled workday, reasonable lunch costs are reimbursable (if lunch is consumed at the work-site). These charges should be reported to the "Meals-Travel & Entertainment" account code in the expense reimbursement system.
- If a colleague works 11 hours or more and at least three hours past his or her normal scheduled work hours, reasonable dinner costs are reimbursable (if the dinner is consumed at the work-site). These charges should be reported to the "Meals-Travel and Entertainment" account code in the expense reimbursement system.

TRAVEL AND BUSINESS EXPENSES WITH AN OVERNIGHT STAY

Reimbursable Expenses

The following travel and business expenses, when reasonable and properly substantiated, are reimbursable:

- Air and train travel
- Fee for the first piece of checked luggage charged by the airline. Consideration should be given to carry-on luggage when possible to minimize such costs. Unless the colleague is on an extended trip or other unusual circumstances exist, fees for excess weight and multiple pieces of checked luggage are not reimbursable.
- TSA and Global Entry application fees are reimbursable with manager approval.
- Transportation costs by personal automobile or public transportation to and from an airport or train station and home, hotel, or office.
- Taxi fares.
- Hotel or other lodging costs.
- Internet/Wi-Fi access at hotel.
- Meal costs.
- Gratuities.
- Laundry and dry cleaning when business travel requires five or more consecutive nights away from home.
- Rental car costs.
- Parking charges and auto tolls when traveling on business.
- Telephone and fax charges. In general, a traveler should avoid telephone calls from the hotel room and use mobile/cellular phones.
- Overnight delivery charges.
- Vaccines required for international travel.

NON-REIMBURSABLE EXPENSES

The organization's intention is to reimburse colleagues for all ordinary, reasonable and necessary expenses related to conducting company business. However, there are certain expenses that DVG does consider personal and non-reimbursable.

- Computer or electronic equipment (i.e. PCs, laptops, IPad, printers, mobile hot spots, routers, etc.).
- Mobile phones and most accessories (i.e., batteries, hot spots, etc.).
- Electronic devices (i.e.., Blackberry, Treo, smartphones, pagers, daily organizers).
- Fitness center or club memberships.
- Personal services (i.e., haircut, shoe shine, house or pet-sitting, etc.).
- Coffee "K-cups", Dunkin Donuts, Starbucks, or other non-approved "premium" coffee or tea brands for
 colleague or student use in DVG provided or personal coffee machines. Coffee grinders, non-standard coffee
 machines or dispensers.
- Plastic utensils, (forks, spoons, knives), condiments (mustard, salt, pepper, mayo, ketchup, etc.) should not be purchased for general office use in any quantity.
- Recurring meals, snacks, or entertainment for DVG colleagues or students. I.E. candy, chips, doughnuts, pastries, etc. when not part of a bona fide business meeting.
- The cost of commuting to and from the office during a normally scheduled work week.
- The cost of parking at a colleague's principal (or assigned) office, including allocated monthly parking charges.
- Traffic or parking tickets.
- The cost of rental car navigation/GPS devices.
- Car washes, oil changes, and other maintenance or repair services for personal or rental automobiles.
- Gasoline/fuel for personal automobiles.
- Meals with other DVG colleagues, vendors or other persons that have no direct business purpose (i.e. birthday celebrations)
- Recurring entertainment of DVG colleagues, suppliers or other persons that has become reciprocal.
- The cost of an individual meal (i.e. eating lunch at your desk) as a personal convenience.
- Entertainment at adult clubs; at locations that exclude individuals because of race, gender, religion, etc.; or at other locations that have the potential to reflect negatively on the organization.
- Unreasonable costly expenditures (i.e. expensive meals, wines and liquor). DEM colleagues are not allowed reimbursement for alcohol at any time.
- Costs incurred for out-of-policy business expenses (i.e. violation of the air travel class rules) and costs incurred for changing airline ticket for personal reasons.
- Costs associated with airline upgrades or prepaid seat assignments are non-reimbursable
- Greeting cards and related postage and flower arrangements (e.g., holiday, birthday, anniversary, sympathy, get well) sent to DVG personnel.
- Apparel purchases (business or casual).
- Business materials (i.e., briefcases, organizers, pen and pencil sets, pocket calculators).
- Additional fees associated with optional wireless service features (i.e., additional text messaging, directory assistance, software, camera, video, games, ring tones, screen savers).
- Political contributions.
- Membership dues in airline clubs (unless pre-approved).
- Membership dues in frequent-traveler award programs (i.e. Diners Club/MasterCard Rewards Program and American Express Membership Rewards, other rewards programs)
- Membership dues to Costco, Sam's Clubs, or other big box vendors.

- Charge for services, fees, rates, etc. in excess of the set policy for those expenses.
- Air phones (telephone on the airplane).
- Annual credit card fees.
- In-room honor bars, in-room movies and in-room entertainment (video games).
- Site-seeing tours, extra travel destinations tied into business travel.
- Substitutions (e.g. if lodging is provided by others, hotel costs not incurred may not be spent for other purposes). Colleagues are discouraged from accepting lodging or air transportation from companies with which the DVG conducts business, e.g., suppliers.
- Cost of traveler's checks.
- Travel life insurance.
- Charitable contributions.
- Newspapers, magazines, books, etc.

PHONE AND INTERNET USAGE REIMBURSEMENT

Remote colleagues (not located within a campus/centers/Home Office) may be reimbursed for the actual cost of their home office phone when used for business purposes up to a maximum of \$100 per month. Substantiation (including calculations) on the percentage of business versus personal use must be included in the expense description/documentation when seeking reimbursement for home phone service.

For all colleagues, the cost of basic residential internet service (including any taxes/installation fees) for the first connection you have in your home is non-reimbursable. However, the incremental charges for business class internet (when required) or other additional business related charges over the cost of basic service incurred for your home internet connection are reimbursable.

For any reimbursements of home phone or internet charges of \$25 or over, a receipt will be required. For bundled packages that include more than one service (e.g. home phone, internet, cable T.V., cellular service, etc.) a receipt highlighting the charges for each is required.

Only qualified colleagues are eligible for reimbursement of a portion their mobile phone charges each month. For full details on how to qualify, reimbursable items, and amounts, please refer to the Mobile Phone/PDA Reimbursement Policy posted in the finance policies section of the DVG Commons.

RELOCATION EXPENSES

Reimbursement for relocation expenses must be approved in advance by the Human Resources Department. Full instructions on how to report and receive reimbursement for relocation expenses is available from the Human Resources Department. Relocation expenses should not be reported via ExpenseWire.

COMPUTER SOFTWARE AND HARDWARE AND TELECOMMUNICATION DEVICES

Computer software and hardware as well as telecommunication devices should be acquired through the local IT department to ensure that hardware and software are compatible with DVG's systems, support our objectives, and have been included in the annual budget.

CONTINUING PROFESSIONAL EDUCATION

Registration fees for continuing professional education (CPE) seminars or training classes not readily available internally are reimbursable, when pre-approved by the colleague's supervisor.

ENTERTAINMENT OF CLIENTS, PROSPECTIVE CLIENTS AND OTHER BUSINESS ACQUAINTANCES

Entertainment activities with clients and others that assist in business and relationship development for DVG are reimbursable. The entertainment should be reasonable, infrequent and not lavish or excessive. Examples of such activities include meals, sporting or cultural events, local golf, tennis or other outings. Event tickets, meals and local transportation when incurred with such activities are reimbursable as long as they are reasonable and benefit DVG.

Reimbursement is allowed only when the entertainment is properly reported. This reporting must include the date, the activity, business purpose and the attendees (names, titles, and relationship with the applicable company colleague) in the fields provided in the expense reimbursement report.

Most companies have policies with respect to acceptance of gifts, meals, services and entertainment by their colleagues, and the rules of governmental units and agencies are especially strict in this area. All colleagues must strictly adhere to the DVG gifts and entertainment policy, gift and entertainment policies of our clients and not extend invitations that would cause individuals to violate their employer's policies. See https://portal.thedevrycommons.com/portal.jsp?Dy3uQUnbK9L2RmSZs02CjV3Jh9YwRCfE6ojb0yV2LU1S6zmqoB9Foj393JDyFDWOpV.

Entertainment at locations that would reflect negatively on DVG or that would exclude individuals because of race, gender, religion, etc., is unacceptable and not permitted under any circumstances.

ENTERTAINMENT OF DVG PERSONNEL

In general, business activities and meetings that are appropriately carried on in the office, but which may also be carried on in connection with a meal, are usually business expenses. The charges associated with staff entertainment are to be incurred and reported by the most senior individual in the group.

Occasional entertainment of colleagues in connection with a specific event (i.e., completion of a large and difficult project) or a lunch or dinner used for a specific purpose is a reimbursable expense. The location for such entertainment, lunch, or dinner should be appropriate and the expense should be reasonable. Recurring entertainment of the same individuals (e.g., regular luncheons with the same staff members) is a personal expense. Staff-to-staff entertainment is not permitted.

Entertainment at locations that would reflect negatively on DVG or that would exclude individuals because of race, gender, religion, etc., is unacceptable and not permitted under any circumstances.

INTERNET ACCESS AT PUBLIC SITES

Wireless internet connections from public sites (i.e., Starbucks, McDonald's, Kinko's) are not recommended and are generally not reimbursable. However, if a business need arises, the cost of this connectivity is reimbursable.

OFFICE SUPPLIES

Office supplies, whether used in the office or at home (for approved telecommuters only), should almost always be purchased through standard procurement channels using the DVG's designated national vendor, Office Max. For extended out-of-town assignments, advance planning should minimize the need for direct purchase of supplies outside of these channels. However, when you need supplies immediately, you may purchase them and be reimbursed through the expense report.

PROFESSIONAL EXAMINATION, LICENSING, REGISTRATIONS, IMMUNIZATIONS

All colleagues are reimbursed for the costs of all required registrations, permits, licenses, and immunizations.

PROFESSIONAL SOCIETIES AND BUSINESS ORGANIZATIONS - DUES

Colleagues are reimbursed for membership dues and expenses related to their active participation in other business organizations (i.e.., state CPA Societies, American Bar Association, Chamber of Commerce) if pre-approved by their manager. Colleagues are not reimbursed for membership dues and expenses related to inactive memberships in business and professional organizations, or for memberships that are not relevant to their standing with DVG.

EXPENSE POLICY QUESTIONS AND CLARIFICATIONS

Questions or further clarifications regarding the Expense Reimbursement Policy should be directed to the head of Finance for your respective location/organization.

Becker Professional Review	Kevin Udani – 630.515.5447
Carrington Colleges	Beth Rogers – 916.388.2889
Chamberlain College of Nursing	Sonya Evanosky – 630.353.8708
DeVry Education Group Home Office:	. Christy Andrews – 630.515.3110
	Rick Hayden – 630.515.7716
DeVry University	Kerry Kopera – 630.515.5400
Ross University School of Medicine	. Dean Shillingford – 767.255.6500 ext. 6376
Ross University School of Veterinary Medicine	.Ray Francis – 869.465.4161 ext. 1103
American University of the Caribbean	Alison Stewart – 305.569.8843
DMI Shared Services	Doug Gertner - 732.509.4779

4 GENERAL TRAVEL INFORMATION

GETTING STARTED

For steps and policies for arranging travel related to DVG business or meetings, go to the **Meetings/Travel** section on the **DVG Commons** website.

RESOURCES	HOME OFFICE SUPPORT
Request System Access / Service Catalog	>> Finance >> Meetings/Travel
Request IT Support / Create Remedy Ticket	Supply Management DeVry Group Legal
Services / System Status VPN	» Ethics & Compliance Services
Adobe Connect/Res+ Online Meetings	» Emergency Response Plan» SIREN Emergency Alert System
Job Postings	ExpenseWire-reimbursement RESOURCES FOR WORKING WITH STUDENTS
DeVry Education Group Talent Connection	» my.devry.edu
DeVry Leadership Center: Enroll in a Course	» DeVry Education Group Internal Referral Process Guide for Prospective Students
	» How To Hire A Student Worker
	» Joint Events Quick Reference Guide

You will find information on:

- How to create and manage your travel profile, and
- How to book flights, hotels and cars online through DVG's approved vendors

Sign on and complete the profile prior to making your travel arrangements. The information in the profile helps in a smooth booking and reservation process. Within the profile, you are able to assign a delegate to make reservations for you. Be sure to indicate your name as it appears on your formal ID, include your D#, and your institution and department numbers to assure proper charging of your air expenses. All air reservations booked through TSI/BEST are automatically billed to a corporate credit card and are not reimbursable.

TRAVEL REGISTRATION

All colleagues are required to arrange all travel (airfare, lodging, and ground transportation) through the TSI/BEST/Concur online booking tool. For TSI use www.tsiusa.com/DVG and BEST use www.concursolutions.com. You may also call TSI/BEST directly using the phone numbers in the Table 1 below.

Colleagues are encouraged to use Concur for booking domestic travel. For international travel or assistance from a live travel agent, please call the following TSI/BEST reservation numbers.

Hours of Operation	DVG excluding DMI (BEST)	DMI (TSI)
Monday thru Friday - 8:30-5:00p EST	In the U.S.A. 888-943-3879	214-915-9201 or 855-709-9201
	International 847-472-5899	
Emergency/After Hours – In the U.S.A	Access Code AN4	214-915-9201 or 855-709-9201
	866-579-4405	
Emergency/After Hours – International	Access Code AN4	800# listed on your itinerary
	682-233-0914	

Table 1: TSI/BEST Phone Numbers

By booking travel online through Concur or TSI/BEST directly, it ensures that the arrangements are made in compliance with policy, volume discounts are leveraged and the travelers are easily located in the event of a travel emergency.

Travelers should not purchase travel related services via the internet, from another travel management company, or directly from the airline, hotel, or ground transportation vendor.

UNITEDHEALTHCARE GLOBAL ASSISTANCE CARD

Travel services and emergency assistance is provided by **UnitedHealthcare Global Assistance**, providing help by phone while traveling. When traveling, you can now feel confident that you are in safe hands if an emergency arises. **UnitedHealthcare Global Assistance** provides medical, security and travel-related assistance services.

WORLDWIDE 24-HOURS a DAY

MEDICAL ASSISTANCE SERVICES

Worldwide Medical and Dental Referrals
Monitoring of Treatment
Facilitation of Hospital Payments
Transfer of Insurance Information

Transfer of Insurance Information to Medical Providers

Medication and Vaccine Transfers Dispatch of Doctors and Specialists Transfer of Medical Records

Continuous Updates to Family, Employer and Home Physician

Hotel Arrangements for Convalescence
Replacement Corrective Lenses and Medical Devices

TRAVEL ASSISTANCE SERVICES

Replacement of Lost or Stolen Travel Documents Emergency Travel Arrangements Transfer of Funds Legal Referrals Translation Services Message Transmittals

WORLDWIDE DESTINATION INTELLIGENCE

Pre-Travel Information
Travel and Health Information
Security Intelligence

MEDICAL EVACUATION AND REPATRIATION SERVICES

Emergency Medical Evacuations
Transportation to Join a Hospitalized Member
Return of Dependent Children
Transportation after Stabilization
Repatriation of Mortal Remains

PERSONAL SECURITY SERVICES

Political Evacuation Services
Security Evacuation Services
Transportation After Political or Security Evacuation



GLOBAL ASSISTANCE UnitedHealthcare Global Emergency Response Center:
United States +1-410-453-6330 (Reverse Charges Accepted)
TOLL FREE ACCESS - The numbers below must be dialed from within the country
If your location is not listed or the call will not go through, call the 24-hour
Emergency Response Center collect (reverse charges accepted)

A	1,000,100,000	lonon	00504.44.4005
Australia	1 800 127 907	Japan	00531 11 4065
Brazil	0800 891 2734	Mexico	001 800 101 0061
China (northern)	108888*800 527 0218	Philippines	1 800 1 111 0503
China (southern)			800 1100 452
Dominican Repub	olic 1 888 567 0977	South Africa	0800 9 92379
France	0800 90 8505		900 98 4467
Germany	0800 1 811401	Switzerland	0800 55 6029
Hong Kong	800 96 4421	Thailand 00	1 800 11 471 0661
Israel	1 809 41 0172	U.K.	0800 252 074
Italy	800 877 204	U.S. & Canada	1 800 527 0218

* Dial the first portion of phone number, wait for tone, and then dial remaining numbers. For a complete list, go to the Global Intelligence Center: https://members.uhcglobal.com

Notice to Physicians/Hospitals: Call immediately for benefits verification and procedures. Call 24 hours a day (multilingual). If you do not have access to a phone, email for assistance: assistance@uhcglobal.com

Always carry your **UnitedHealthcare Global Assistance** Identification Card with you. (See above). Listed on the back of the card are the telephone numbers for the worldwide **UnitedHealthcare Global** network. When you call, be prepared to provide your ID number, organization's name, your name and a description of the situation.

IJET – INTERNATIONAL TRAVEL RISK MANAGEMENT

iJet is an intelligence-driven risk management system that provides visibility into global threats and their impact on our travelers and expatriates before, during and after their trips. When you book **international** travel through TSI/BEST, your itinerary is automatically provided to iJet who will alert you and our **Security and Business Continuity** department about emergent threats and crisis situations that could affect your travel experience. This real-time intelligence provides location data and speeds our ability to contact and respond to colleagues on travel or expatriate assignment anywhere in the world. iJet also provides a mobile app to all our international travelers upon booking an international trip. You can download the mobile app here:

https://play.google.com/store/apps/details?id=com.ijet.iJet

In the event, you book travel to a location that is under a **heightened security warning, level 1, 2 or 3 CDC Travel Advisory** or on the **U.S. State Department DO-NOT-TRAVEL** list, iJet will alert our Security and Business Continuity department who may contact you or your manager if further information about your trip is warranted or additional security measures required.

Important Note: If you do not book your travel through TSI/BEST, including travel booked by vendors, we cannot guarantee this coverage for your trip, including the services provided by iJet. Timely notification allows any necessary security measures to be coordinated. In the event security measures are deemed necessary and time is not available to arrange the proper level of support, travel may need to be postponed until the necessary security measures can be coordinated.

CONDUCT WHILE TRAVELING

During business travel a colleague must adhere to the standards of conduct as described in the DVG **Code of Conduct and Ethics**. The DVG Code of Conduct and Ethics is available on the Ethics and Compliance Services page of the DeVry Commons, or you can contact the Ethics and Compliance Services department directly at Ethics&ComplianceServices@devrygroup.com.

Please refer to the Code of Conduct, which contains basic information about our policies as well as information about how to obtain guidance regarding a particular business practice or compliance concern. It is essential that you thoroughly review the Code and make a commitment to uphold its requirements. Colleagues must also understand and agree to observe the laws of the country in which they are traveling and all applicable academic and disciplinary regulations. Violations of policy, no matter where they occur, may result in disciplinary action.

ACCIDENTAL DEATH AND DISMEMBERMENT BENEFIT

DVG automatically provides you with Business Travel Accident (BTA) coverage that provides a benefit for you and your insured dependents while traveling on DVG business.

For questions or assistance, call the askHR Service Centre at 1-855-882-4770, M-F 8-7pm CST, or visit https://portal.theDVGcommons.com/portal.jsp

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Log in, then proceed to: home >my benefits>U.S. benefits>additional insurance>business travel accident

5 | TRAVEL POLICY

AIR TRANSPORTATION

DVG requires all air travel to be booked through its authorized travel management company. An authorized travel management company provides numerous value-added services including traveler support and travel management data crucial to achieving DVG's objectives. Failure to utilize DVG's authorized travel management company not only diminishes its buying power and ability to achieve quality standards, but also contributes to higher costs and reduced levels of service.

Tickets should be purchased as far in advance as possible when business plans are firm. This often results in substantial savings to DVG. It is strongly recommended that travelers book their airline tickets no less than 14 days in advance.

Colleagues should request flights according to approximate departure and arrival times rather than by a specific airline or flight number. This allows the travel management company to book the lowest appropriate fare for flights departing within a two-hour time frame.

- **Connections:** When there are both connecting and direct flights, the connecting flight should be booked when it is has only one-stop, the fare difference for the direct flight is \$200 or more, and it arrives within two hours of the direct flight. A traveler will only be allowed to reject this cost effective alternative for a pertinent business reasons with an email approval from their Vice President or President as appropriate.
- Preferred Airlines or Airports: Travelers may not refuse suggested flights in order to fly on preferred airlines and/or out of preferred airports. Should the traveler turn down a suggested flight to fly using preferred airline or airport, the traveler may be held responsible for the difference in the fare. Travelers are allowed to keep mileage accumulated under their frequent flyer programs when traveling for DVG business. However, DVG does not allow travelers to refuse lower cost (comparable) flights in order to accumulate mileage on specific carriers.
- **Higher Price Tickets:** Airlines have been changing their mileage loyalty programs to reward flyers who purchase higher priced tickets, and restricting seat selection at time of purchase. Travelers should never refuse a suggested flight to purchase a more expensive ticket for more points or rewards. Additionally, travelers should not pay the additional amount to secure a seat assignment. Should the traveler turn down a suggested flight, or request a prepaid seat assignment, the traveler may be held responsible for the difference in the fare.
- **Upgrades:** Whenever possible, colleagues should be selecting the discounted or nonrefundable fare as that can represent substantial airfare savings to DVG. Requesting full-fare tickets for the purpose of using upgrades is strictly prohibited. Moreover, any conversion of a higher class ticket into a lower class ticket(s) for personal gain is prohibited. Frequent-flyer upgrades or upgrade coupons can only be used if no additional cost is incurred by DVG.
- Unused Tickets: If it becomes necessary to change an airline ticket purchased through DVG's authorized travel
 Management Company, advise TSI/BEST immediately. Only the cost of the used portion of an airline ticket is
 reimbursable.

• Airline Club Memberships: DVG does not reimburse the cost of airport airline club memberships.

PERSONAL TRAVEL

It is the traveler's responsibility, to identify any personal travel that will occur in conjunction with business travel when making reservations with TSI/BEST. When personal travel is part of the business travel, the traveler must make arrangements directly with a TSI/BEST or agent in order to calculate the cost variance. The traveler is responsible for the variance in cost. If the variance of the airline charge is \$25.00 or less, there is no need to reimburse DVG. If the variance of the airline charge is greater than \$25.00, TSI/BEST will charge the traveler's personal credit card for the variance.

CLASS OF SERVICE

Guidelines for domestic and international class services:

- **DOMESTIC**: non-refundable, coach or economy class is the standard class of domestic air travel and includes travel within the United States, Canada, Mexico, and the Caribbean.
- **INTERNATIONAL**: When there is an individual flight segment scheduled to last seven hours or longer, this segment of the travel may be booked as business class. Business class travel on any other international segment lasting less than seven hours requires written approval in advance from the colleague's department Vice President or President as appropriate.
- Charter flights are not approved within the travel policy and are to be considered only under exceptional circumstances, such as when security risks or the absence of commercial flights make commercial travel non-viable. Charter flights require the prior approval of the DVG Chief Financial Officer.

LODGING

In order to receive discounted/contracted rates, all hotel accommodations must be booked via TSI/BEST. This assures DVG of receiving the lowest available discounted/contracted rate. Travelers should inquire at the time of check-in if lower rates are available and if so, confirm the lower rate. Any discrepancies should the hotel refuse to make adjustments should be reported to TSI/BEST immediately. Exceptions would include any conference rate offered via the conference website or via a conference number when a reservation can be made directly with TSI/BEST.

Reservations will be guaranteed for "late arrival" by the traveler's credit card. If travel plans change and the traveler is unable to communicate with TSI/BEST, it is the traveler's responsibility to cancel lodging reservations directly with the hotel and record the cancellation number (many hotels are requiring a minimum notice of 24 hours). In addition, many hotel properties are charging early departure fees. It is the traveler's responsibility to confirm departure dates upon check-in and make adjustments as necessary to avoid such fees.

Reimbursable lodging includes the cost of a room and related taxes. Lodging (i.e. daily room rate), meals, and any other business expenses included on the hotel bill should be reported separately and accurately classified in the expense reimbursement system. Reimbursable lodging does not include payments for the use of personally owned property or lodging provided by colleagues, friends, relatives, etc., in lieu of using a hotel. Colleagues will be reimbursed for standard hotel rooms (e.g. no suites).

GRATUITIES

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Gratuities paid while conducting business is reimbursed based on reasonable actual amounts expended. Gratuities are normally identified separately when paid to bellmen or airport porters. Gratuities for meals and taxis are normally included in the expenses for these categories. The following are reasonable gratuities by category:

- Meals 15%-20%
- Luggage assistance \$1-\$3 per bag
- Taxi rides 15%-20%
- Housekeeping \$3-\$4 per day

Tips/gratuities should be appropriate to the location, service level and local protocol and never to exceed 20% of the total bill.

ALTERNATIVE TRAVEL

Travel typically occurs Monday through Friday to meet business requirements, yet it may be desirable for the traveler to request an alternative travel arrangement to gain some flexibility on weekends that coincide with business travel.

The alternative travel options listed below do not create reimbursable funds that can be spent as desired. No substitutions are allowed (e.g. if lodging is provided by others, hotel costs not incurred may not be used for other purposes). Unused trips cannot be carried forward to future weekends nor can you "borrow" from future weekends. All travel must be completed during the weekend bridging the weeks of the business assignment. Additionally, paid time off or any leave of absence period negates the ability to use alternate travel.

The following reimbursable options apply:

- Saturday night stay Ordinarily there is no objection to departing one or two days early (e.g., leaving on a Saturday for a commitment beginning on Monday morning) or staying one or two extra days (e.g., staying over until Sunday after a meeting ending on Friday or Saturday). The assumption is that the airfare can be less expensive due to the Saturday night stay. In this case, the total cost of the trip (including the one or two additional hotel nights and any expenses as if this were a normal workday) is expected to be less than or equal to the total cost of the trip on the day one would normally have traveled. Any excess cost will be treated as a personal expense and is not reimbursable.
- Weekend stay at work location If a Saturday and Sunday stay at the work location is a business requirement, the treatment of expenses are the same as any other business day. The typical hotel, meal, and incidental expenses apply. Other costs incurred over the weekend or during the workweek such as entertainment or sports and cultural events are personal expenses and are not reimbursable.
- Travel of a spouse or significant other- This provision applies to assignments of more than 30 contiguous days in duration when a colleague is entitled to travel home and return to the same work location. In this situation, each 30 days, the colleague may elect, in lieu of traveling home for the weekend, to have a spouse or significant other travel to the work location. There is a limit of one trip per each contiguous 30 days. Only the transfer and transportation costs of one other individual, plus the colleague's weekend hotel and meal costs, up to the amount one would have paid to travel to and from home for the weekend are reimbursable expenses. All other costs (ground transportation, mileage, parking, entertainment, spouse, or significant other meals, etc.) associated with the weekend or additional days are a personal expense and are not reimbursable. The comparison of cost to travel home versus the cost of travel by another should be well documented on the expense report under the "comments" section. This must be approved in advances by the colleague's Vice President or President as appropriate.

MEAL AND ENTERTAINMENT EXPENSE

Meals and entertainment necessary for the conduct of business should be both reasonable in cost and appropriate based on the nature of the business being conducted. Entertainment may include only those colleagues absolutely necessary to the business discussion and is to be paid for and reported by the highest-level colleague present. Entertainment falls into three categories for reimbursement:

- Business meals
- Entertainment preceding or following a bona fide business discussion
- Entertainment directly related to a business discussion

DVG policy does not permit reimbursement for mini-bar, theater, nightclubs, sporting events, or other entertainment.

Only those reimbursement requests which contain the full name, title, and business affiliation of those persons being entertained, and which clearly indicate the business purpose of the entertainment or identify the related business meeting will be reimbursed. If two or more colleagues are traveling together, each must separately account for his/her expenses to the extent practical. Meals and room service may be charged to lodging bills. However, these expenses must be appropriately separated when submitting an expense report.

GROUND TRANSPORTATION

Taxis and hotel courtesy shuttles should be used where possible. Taxi may be utilized whenever courtesy vans are not available or practical.

Chicagoland taxi services:

- American Taxi: Call 847.673.1000. You must mention that you are a preferred customer with DVG. As a preferred customer, you will be dispatched a corporate driver, pay no tolls, no charge for up to three additional passengers (flat rates apply to and from the airports, and to downtown Chicago). Fuel surcharges and airport taxes may apply. Check current rates at: http://www.americantaxi.com/rates.asp
- 303 Taxi: Call 847.256.8294 and reference DVG's account #9283. You will be recognized as a corporate customer, will be dispatched a corporate driver and will receive benefits of no tolls, no charge for additional passengers. Fuel surcharges and airport taxes may apply. Check current rates at: http://www.303taxi.com/rates.aspx

RENTAL CARS

Enterprise Holdings (National, Enterprise, and Alamo) is DVG's preferred car rental supplier. Our agreement enables you to benefit from competitive rates and exceptional services for your business travel and travel needs.

- To join the Emerald Club access www.nationalcar.com/offer/xz15041
- Reservations should be booked online through TSI/BEST/Concur
- Rent mid-sized vehicles at DVG contracted base rate (or less when special rates are available). When booking
 through Concur, the base rate is not shown. The rates shown include the base rate, plus a city surcharge (if
 applicable) and fees and taxes.
- Use your personal credit card as the form of payment, and file for reimbursement via ExpenseWire.

- Decline all insurance coverage for U.S. and Canadian travel. Purchase all insurance coverage for travel outside
 of the U.S. and Canada. DVG will not reimburse colleagues for accepting additional insurance coverage with the
 exception of foreign travel.
- Any questions about the car rental program, please feel free to contact TSI/BEST.
- Use judgment in deciding whether or not local transportation (i.e. taxi, limousine, etc.) is cost effective in relation to car rental expenses.
- Allowable expense is based on the rental of mid-sized vehicle. A full-size automobile is reasonable if three or more people will be sharing the use of the automobile.
- Fees for rental car navigation/GPS devices are not reimbursable.

Rental cars should be returned to the vendor with a full tank of gasoline to avoid refueling surcharge. Cost of refueling, with a receipt, will be reimbursed on the colleague's expense report.

DVG's insurance coverage for rental cars **only covers colleagues who** are using the car for DVG Group business. The coverage does not cover personal usage (i.e. extended stays for personal reasons, or non-business after hours travel) or other drivers. Colleagues on business for extended periods of time who will be utilizing the vehicle for personal travel, or will be allowing a spouse or other person drive the vehicle, are advised to carry separate insurance to cover accidents/damage to the vehicle. That portion of the insurance coverage is considered a personal expense and is not reimbursable.

CAR ACCIDENTS WHILE TRAVELING

If a colleague is involved in an accident and the vehicle is damaged, or if the vehicle is vandalized or stolen, the rental company and local police **must be notified** when possible. Failure to notify both the rental car company and the police may negate some or all of the insurance benefits. Always request a copy of the police and accident report. Keep all reports and paperwork from the incident in addition to the original rental agreement.

Contact **Travelers Insurance** at **800-832-7839** to report an auto accident of a rented vehicle that occurred on company business.

USE OF PERSONAL VEHICLE

Reasonable parking costs, tolls and actual mileage driven are reimbursable when it is necessary for a colleague to travel by personal vehicle for business purposes. Reimbursement will be made only for mileage costs in excess of those normally incurred to and from the base location for travel without an overnight stay. All mileage to and from an airport, train station, or work related location and home, hotel, or office is reimbursable for travel with an overnight stay. Colleagues should submit the reimbursement request via ExpenseWire which will reflect the current, published IRS mileage reimbursement rates.

When a personal automobile is used for transfer to a local air or rail terminal, the actual mileage incurred will be reimbursed at the applicable published IRS rates when traveling on business and an overnight stay is required. Parking at or near air or rail terminals will be reimbursed. Valet parking services or optional services (i.e., car wash, oil change) are personal expenses and are not reimbursable. Automobiles should not be parked for extended periods at air or rail terminals unless the combined cost of mileage and parking is less than other available public transportation costs.

A colleague's vehicle liability insurance provides primary liability coverage. Colleagues are to maintain personal automobile insurance coverage in amounts of at least \$100,000 combined single limit coverage or \$50,000/\$100,000

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bodily injury and \$25,000 property damage liability on private automobiles owned or leased by them, if used in connection with company business.

Colleagues are to use any privately owned or long-term leased automobile for DVG business if the above minimum amounts of liability coverage are not in effect. DVG's insurance policy may provide liability coverage to a colleague driving a personal vehicle if the colleague is deemed to be an agent of DVG (e.g. on DVG business) at the time of loss. DVG Group assumes no liability for damage to the colleague's vehicle while it is being used by the colleague on company business.

6 | EMERGENCY PROCEDURES

EMERGENCY SUPPORT AND PROCEDURES

All travelers should become familiar with the resources (UnitedHealthcare Global Assistance, iJet/Worldcue, etc.) available to them in an emergency or crisis while traveling. While most travelers experience a safe and healthy time while traveling, some do encounter both minor emergencies (i.e., theft, illness, injury) and major crises including natural and environmental disasters, civil unrest, health outbreak (epidemic/pandemic), political uprising, terrorist attack, etc. Your health, safety and well-being is a top priority for DVG. Below are some practical guidelines to prepare you in the event of an emergency or crisis while traveling.

PREPARING FOR EMERGENCIES WHILE TRAVELING

The first step in crisis management is being prepared before a crisis occurs. In most cases, you can respond to minor emergencies in the same way you would respond in a similar situation in your home country. However, what may be considered as a minor emergency in your local country, can be more difficult to handle abroad.

Both domestic and international travelers can utilize the **UnitedHealthcare Global Assistance hotline #1-410-453-6330** to reach medical, security and travel-related assistance while traveling. This service provides a live operator 24/7 – 365. (See **UnitedHealthcare Global Assistance Card** section, on page 15 for more information).

When traveling on weekends or over holiday periods, be sure to keep your local contacts informed of your intended itinerary. It is important that your manager and local personal contacts always know where and how to contact you in an emergency.

Your emergency action plan should include:

- Ensure a list of important phone numbers (emergency numbers in your host country, numbers for local supervisors/contacts and home embassy/consulate) are both in your phone and on your person in case you are separated from your phone.
- Your **UnitedHealthcare Global Assistance identification card (see page 15)** along with copies of your insurance papers, passport, and names of any medications to which you are allergic. iJet can also connect you to our medical provider UnitedHealthcare Global Assistance just press the hotline button.

WHAT TO DO IN EMERGENCIES

Dealing well with a crisis situation includes keeping yourself as safe as possible and communicating with your emergency contacts. It is important to remain calm and exercise good judgment.

Should you encounter difficulties or problems that you cannot easily solve on your own, follow these steps:

- Secure your immediate physical safety (e.g., call 911 or its local equivalent, go to the hospital, and/or seek shelter).
- Call the UnitedHealthcare Global Assistance hotline #1-410-453-6330 for immediate assistance 24-7 365 days a year.
- Keep your phone line open and check e-mail if you can. In the case of a serious international incident,
 UnitedHealth care and/or iJet, and DVG will try to reach you by using the contact information that you provided
 in the TSI/BEST/iJet database.
- Additionally, international travelers can utilize the iJET Quick Connect System via the WorldCUE mobile app
 which brings emergency assistance through 1-click of a button (see below). Use the HOTLINE for general/nonemergency assistance including lost passport, directions, etc. The SAFETY CHECK-IN button is for those
 traveling to higher risk locations to inform of safe arrival to your destination. The CRISIS SIGNAL instantly alerts
 our response team that you need critical assistance while pinpointing your current location. This button is
 exclusively for critical or emergency situations warranting immediate medical attention, evacuation
 (medical/civil/political), etc.
- iJETwill contact the DVG **Security and Emergency Management department** while coordinating your services with Chartis, our medical insurance provider or other third party resources as warranted.



Once the immediate situation has been addressed, you should contact your manager if possible. The **DVG Security** and **Business Continuity department** can assist in coordination of this contact as well.

Name	Responsibility	Email	Phone #/Text (SMS)
Cynthia Berry	Regional/International Travel Security & Business Continuity	cberry@devrygroup.com	630.886.9105 cell
David Stowe	Regional Security	dstowe@devrygroup.com	630.936.8161 cell

ENTRY REQUIREMENTS

U.S. permanent residents should check with the U.S. Immigration Service concerning regulations for travel and reentry into the U.S. It is particularly important to verify procedures for those who contemplate being outside the U.S. for more than six months. Allow sufficient time to obtain all the necessary entry requirements prior to your departure.

Always check the entry requirements for your destination country, which can be found on the country's embassy website. To enter a country, with or without a visa, you might be required to show any of the following:

- Proof of sufficient funds for the duration of your stay
- Acceptance letter from a DVG institution, overseas program, or host organization
- Proof of medical insurance and required vaccinations
- Letter of good conduct from local police department and/or FBI
- Background check
- HIV/AIDS test results

LOCAL AND NATIONAL LAWS - WHAT TO DO IF YOU ARE DETAINED?

While traveling in foreign countries, DVG colleagues are subject to that country's laws, rules, and regulations of country destination. There can be significant differences between the laws and justice system in your native country and your destination countries.

Review your itinerary carefully and familiarize yourself with the justice system and laws of countries you are visiting at the <u>U.S. Department of State travel alerts website</u>, which provides country specific information about crime and security, drug related laws and penalties, and local crime hotspots. This website is an excellent place to start learning about your destination.

If you are detained by local authorities on suspicion of a crime, your **local consulate office** has limited ability to assist you. While a consulate office will work to ensure that you are being treated the same as citizens of the country where you are and can offer legal referrals, a consulate will not provide legal advice or counsel or pay legal fees on your behalf.

VISA AND PASSPORTS

Colleagues traveling internationally should check that their passport is current with at least six month validity and three blank visa pages. Colleagues may never travel on a tourist visa when traveling on DVG business but rather obtain a business visa (or equivalent) as necessary prior to the scheduled departure date.

If colleagues require a passport, passport renewal, more passport pages, or a business visa, please contact TSI/BEST for assistance. Use caution when dealing with non-government websites and non-contracted government vendors.

Helpful tip: By having a photocopy of your passport, the passport replacement process will be easier. Before leaving, make two copies of your passport. Keep one copy with you but separate from the actual passport and leave the other copy with someone in the U.S. You may want to scan your passport and send it to yourself as an email

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attachment, so you have a copy of it anywhere you have access to email. Carrying two extra passport pictures and a certified copy of your birth certificate is also a good idea.

Passports

Your passport is your most important legal document while traveling overseas. This is a required document when leaving and entering the United States and when you enter or leave other national borders. It is also the official verification of your citizenship. You should always travel with a valid passport. Some countries require that it be valid for six months or longer beyond your date of starting your travel. If you have a passport and it will expire while you are abroad you must apply for a new passport before leaving the U.S. Keep your passport in a safe and easy to access place. Be sure to report your stolen passport immediately to your nearest embassy or consulate.

Visas

A visa is a stamp or document from a foreign government that grants official permission to enter that country on or after a certain date for a defined length of time and purpose (such as study, tourism, or business). Check well in advance for the visa requirements of your destination (for some countries, obtaining a visa can take more than two months). Visa procedures and customs requirements vary depending on citizenship. Make sure you check all requirements for your country of citizenship and for all the countries you plan to visit. If you are a U.S. passport holder, you can find visa requirements for a specific country in the Entry/Exit Requirements section in the Country Specific Information on the State Department's web at http://travel.state.gov/ or contact TSI/BEST.

Immigration and Custom Inspections

Upon entry to any country, you must show your passport and any required visas and/or proof of immunizations. At an airport, this usually occurs just after you deplane, but before you retrieve your luggage.

Keep in mind admission to the country is entirely at the discretion of the immigration officer. The immigration officer will normally ask you about the nature of your visit and how long you plan to remain in the country. Polite and courteous replies will be helpful. If you have purchased items abroad, please be sure to check with U.S. Customs to make sure no items are prohibited or restricted.

After your passport has been stamped and you have retrieved your luggage, you must pass through a customs inspection. You will receive a customs declaration form to complete prior to arrival, and customs officials will examine it when they look at your luggage. Your bags may be carefully examined, and you may be detained or asked to pay duties if there are any irregularities or violations of customs regulations.

INTERNATIONAL RAIL PASSES

In many countries, trains go almost everywhere one might wish to visit and are a widely acceptable form of transportation. Unlike the U.S., one must often reserve a seat (in advance) in addition to having a ticket. You can reduce the expense of train travel in most countries by buying a rail pass, which for a fixed price, offers almost unlimited travel for a specified period of time. With a rail pass, you will not have to line up to buy a ticket, though you still may need to make reservations. Contact TSI/BEST for assistance in obtaining these passes prior to your business trip as many are only available for purchase in the U.S.

Information about rail passes can be obtained online or from the 24 hour Travel Guard Assistance Center (Domestic: 877-244-6771 and International: 1-715-346-0859)

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OFFICE OF OVERSEAS CITIZENS SERVICES

For all travelers (both U.S. and non-U.S. citizens), your primary resource for emergency services is the **Chartis contact number U.S. toll free: 877-244-6871 or International Collect: +1-715-346-0859**. They have the personnel standing by to advise and assist you and are in a position to mobilize additional resources including DVG personnel to support you. This could include contacting and coordinating with the U.S. Department of State for services they may provide for U.S. citizens overseas. Also if you have the iJet Mobile app downloaded on your mobile device, you can utilize the hotline button to access assistance with these services. (See more about iJet in **What to Do in Emergencies**).

The contact information for the U.S. Department of State and the Office of Overseas Citizens Services is listed below should you wish to explore the information, services provided, and what the U.S. Department of State can and cannot do in a crisis.

U.S. DEPARTMENT OF STATE – INTERNATIONAL EMERGENCIES AND CRISES http://travel.state.gov/travel/tips/emergencies/emergencies 1212.html

OFFICE OF OVERSEAS CITIZEN SERVICESFrom within the U.S. 1-888-407-4747

U.S. STATE DEPARTMENT TRAVEL INFORMATION

The U. S. State Department website (http://travel.state.gov/) provides information to travelers and anyone living abroad. Information is provided to assist with medical, financial and legal problems while abroad. All U.S. citizens traveling abroad should register through the Department of State's Smart Traveler Enrollment Program (STEP). By enrolling in STEP, it will facilitate the U.S. State Department providing assistance to you, as a U.S. citizen, in case of an emergency. To register, go to: http://travel.state.gov/travel/tips/registration/registration 4789.html

Non U.S. Citizens should check with their Embassy or consulate (country of nationality) in order to research what services they offer. By enrolling in STEP, it will automatically give you access to travel updates, travel warnings and travel alerts as appropriate. Your information will not be released without your express permission under the Privacy Act and only cleared personnel of the embassies and consulates are allowed to access your data.

8 | INTERNATIONAL HEALTH AWARENESS AND RECOMMENDATIONS

IMMUNIZATIONS AND HEALTH REVIEW

Description: Proof of immunization and HIV antibody test may be required. Some countries will require that you show proof that you have received the required immunizations for that country.

Others may require that you have a doctor's certificate showing the results of an HIV antibody test. In addition, some countries require all incoming foreigners to take an HIV antibody test. Check to see if the country you are traveling to requires a doctor's certificate showing the results of an HIV antibody test. If you need to be tested, do so only at a center that offers pre- and post-test counseling. Allow at least two weeks for the testing process.

PRESCRIPTIONS

Description: Should you require regular medication or injections (e.g., insulin or allergy shots), be sure to check with your personal physician for advice concerning your welfare while abroad.

Tips

- If you need medications regularly, take an adequate supply with you.
- It is advisable to keep all medicines (prescription or over-the-counter) in their original and labeled containers. A letter from your physician should accompany prescription medicines. This letter should include a description of your condition, the dosage of prescribed medications, and the generic name(s) of the medicine listed.
- If you are required to take medication containing habit forming or narcotic drugs, you should consult the embassies of the countries you will visit before departing the U.S. to avoid potential problems.
- The Centers for Disease Control recommend that people who require routine injections carry a supply of syringes and needles sufficient to last their stay abroad. Be aware that carrying needles and syringes without a prescription may be illegal in some countries, so check ahead of time and take along a letter from your doctor.

In addition, it is advisable to consult the **Transportation Security Administration (TSA)** for latest news and restrictions regarding prescription limitations and other luggage restriction. http://www.tsa.gov/traveler-information/3-1-1-carry-ons

RETURNING TO THE U.S.

Declaration forms will be distributed during your flight back to the U.S. Before you return, you may want to check the items you plan to bring back to be sure they are not prohibited or restricted. Items purchased may be subject to duties/taxes upon re-entry to the U.S. All articles acquired abroad and in your possession at the time of your return back into to the U.S. must be declared to Customs officials, either verbally or in writing. This includes gifts you received or that you purchased for someone else, personal purchases, goods you intend to sell, and purchases made in duty-free shops.

Personal belongings of U.S. origin taken abroad may be sent back by mail duty-free if, on the outside wrapper, it is stated that the articles were taken out of the U.S. as personal effects and are being returned without having been repaired or altered while abroad ("American Goods Returned").

Should you need assistance on matters relating to U.S. Customs while abroad, customs representatives are available in American embassies (see http://www.americanembassyinformation.com/contact.html).

Trusted Traveler Program

TSA Pre \checkmark^{TM} is a Department of Homeland Security (DHS) trusted traveler program. It allows low-risk travelers to experience expedited, more efficient security screening at participating U.S. based airport checkpoints for both domestic and international travel.

Global Entry

Global Entry is a U.S. Customs and Border Protection (CBP) program that allows expedited clearance for preapproved, low-risk travelers upon arrival in the United States. Though intended for frequent international travelers, there is no minimum number of trips necessary to qualify for the program. There is an application process for both programs. For more information see:

http://www.tsa.gov/tsa-precheck/application-program http://www.cbp.gov/travel/trusted-traveler-programs/global-entry

9 | INTERNATIONAL CULTURAL AWARENESS

CULTURAL AWARENESS

As we travel and conduct business abroad, we might assume that we have an understanding of the host country's culture as a result of research beforehand. However, without the benefit of a direct personal experience, differences such as language, religion, social and political structures, and road traffic may be unlike what we anticipate or are accustomed to.

Other differences may be less noticeable, but also very important and can cause a first-time visitor to feel uncomfortable. It is important to remain open and flexible in working with these differences as it can be very rewarding and provide an opportunity to enrich your own personal knowledge and cultural growth. Keep an open mind and your sense of humor in addition to being patient with yourself and others.

- **Gather information** Becoming familiar with the geography, local customs, viewpoints, dress, food, table manners (meal etiquette), greetings, gift giving/receiving, hygiene, punctuality, religion, tipping, transportation, whether or not you can take photos, seating arrangements and physical contact (customary personal space in host country) will be helpful in allowing you to adjust to a new destination.
- Communications Try to communicate simple greetings and acknowledgement in the native language; this is usually appreciated. Most interactions require a greater degree of formality than what we are used to in the U.S. Be aware of differences in personal space and "familiarity". Be prepared to offer a formal greeting in your day to day activities. Be sure to follow your host's lead when it comes to "small talk", sarcasm or kidding, as these comments can be inappropriate or taken as unfriendly.
- **Differences** Be prepared that you may be treated in completely different ways as what you are accustomed based on race, ethnicity, nationality, sexual orientation, age, religion, gender and physical ability. In some instances, what might at first seem like discrimination may just be curiosity depending on the ethnic and racial makeup of the host country.

10 | INTERNATIONAL COMMUNICATIONS

INTERNATIONAL PHONE PROCUREMENT AND USAGE

A limited number of loaner phones are available for colleagues who travel internationally. Check with your local IT department for more information.

STAYING IN TOUCH

The following are guidelines regarding what you may need to stay in touch while traveling. A plug or adapter may be needed to charge notebooks, cell phones, and PDAs while overseas. Be sure yours is functional and packed with your belongings so you can stay connected.

DeVry | Education Group

February 19, 2016

This website http://www.voltagevalet.com/elec_guide.html offers useful information regarding voltage, frequency, the adaptor plug and the electrical outlets used in various countries.

Cell Phone Usage Tips

- Contact your cell phone provider before you leave to find out about international options for business trips. You
 may be able to get a temporary plan while you are visiting another country. To make an international call from
 your cell phone, your carrier network must be compatible with that country. Your phone also must be technically
 capable of making international calls.
- If you are traveling to a foreign destination for more than a week or two, consider buying a local phone. You can use that phone for making calls within the host country and it may prove to be less expensive. Some business travelers also use local SIM cards because it makes communications by mobile phones a lot easier. Check with your manager on whether this is a suitable option for you.
- Make sure that you have texting capability. Text communication is more reliable than voice communication because it requires less bandwidth. It is also proven the <u>most reliable form of communication</u> in an emergency situation or utility outage.

11 | COLLEAGUE RESPONSIBILITIES - USE RESTRICTIONS

EXPENSES IN VIOLATION OF ANTI-CORRUPTION LAWS

Anti-corruption laws around the world (e.g., the U.S. Foreign Corrupt Practices Act, the Brazil Clean Companies Act, and the U.K. Bribery Act) prohibit the direct or indirect bribery of a foreign government official or colleague, and these prohibitions also apply to the third-party agents and licensees that operate on our behalf. Under these laws, DVG and its colleagues can be held liable for such "indirect payments" regardless of whether or not we knew of the improper payment. The definition of a "government colleague" is broad, and it includes not only elected officials of foreign governments and colleagues of foreign governments, but also:

- Consultants who hold government positions.
- Colleagues of companies owned in whole or in part by foreign governments.
- Political party officials.
- Officials of public international organizations

DVG maintains a strict no bribery policy everywhere we operate. DVG colleagues are not permitted to offer or receive anything of value to/from a foreign government official. Refer to DVG's Code of Conduct and Ethics, and DVG's Anti-bribery & Anti-corruption Policy available on the Ethics and Compliance Services page on the DVG Commons for further information.

If you have any questions or concerns regarding this policy, you can contact Ethics and Compliance Services directly at Ethics&ComplianceServices@devrygroup.com, or utilize DVG's Speak Up program resources available at www.speakupdevrygroup.ethicspoint.com.

CATEGORY – Type (GL ACCOUNT)	USES
ADV/PROMO - General (65090)	Advertising and promotional expense not associated with other advertising and promotion items.
ADV/PROMO - Gifts/Giveaways for Events (65071)	Used for giveaways purchased for promotional events (e.g. career fairs, education fairs, information gathering events or gift cards).
ADV/PROMO - Internally Dev. Promo. (65044)	Marketing materials developed internally
ADV/PROMO - Misc. Adv. Expense (65099)	Account to support separation of misc. advertising expense for MLA/Military marketing activities.
ADV/PROMO - Promo. Events (65166)	Promotional activities other than event fees (such as sponsoring a table at an event or a tee at a golf outing).
INSTRUCTION - Faculty Develop. Expense (64101)	Used for expenses related to faculty development
INSTRUCTION - Instructional Supplies (62004)	Supplies purchased for instructional use in the classroom
INSTRUCTION - License/Reg fees to Teach (64101)	Fees paid to state/regulatory agencies for licensing
OFFICE - Computer Hardware/Supplies (62003)	Computer hardware and related purchases
OFFICE - Colleague Recognition/Courtesies (61405)	Used for expenses related to colleague recognition
OFFICE - Equipment Rental (65201)	Minor out of pocket equipment rentals
OFFICE - Furniture & Fixtures (62040)	Expensed Fixtures and Furniture
OFFICE - Internet Charges (65121)	Internet charges for remote colleagues for home office
OFFICE - Janitorial, Bldg Maint. Supplies (63003)	Maintenance Supplies
OFFICE - Meals/Bev Business Discussions (64053)	Meals consumed alone, with other staff members and with clients locally
OFFICE - Office/Meeting Supplies (62051)	Office Supplies - supplies for use in the office (snacks for meetings, light decorations included)
OFFICE - Outside Printing/Copying (62062)	Paid printing and photocopy
OFFICE - Overnight/Express Mail (65153)	overnight, courier and similar shipments
OFFICE - Postage (65151)	postage
OFFICE - Reference Books (62022)	Expense type for reference books for colleagues/faculty members necessary for business
OFFICE - Telephone - Cellular (65125)	Cell phone charges
OFFICE - Telephone - Landline (65122)	non-cellular telephone charges
OTHER - Conference/Seminar/Convention Fees (64115)	Fees to attend Conferences/Seminars/Conventions (such as Career Fairs, Society events, Networking Events, etc.).
OTHER - Entrance Fees (65139)	Expenses for Entrance Fees to certain events (not conventions or seminars)
OTHER - Hiring Expenses (65132)	Expenses incurred which are directly related to colleague recruitment
OTHER - Meals/Bevs - Company Sponsored Mtg (64052)	Meals during Company sponsored events such as holiday dinners, group training sessions or PRIDE dinners
OTHER - Non-Student Reimbursement (63211)	Related to fire at N Brunswick
OTHER - TEACH (65074)	This account is used for all TEACH related expenses.
CATEGORY – Type (GL ACCOUNT)	USES

OTHER - Prof. Svcs Other (65105)	Incidental professional services charges that cannot be handled by an invoice.
OTHER - Rent (63030)	Facilities fees for marketing event rooms or classrooms (or university rent and royalties fees for on-campus/FastPass courses)
OTHER - Special Events - External (65165)	Special events account used for non-colleagues special events
OTHER - Special Events (64116)	Account used for special events budget
OTHER - Student Assist. Fees (61715)	Reimbursements for Student Assistants (non-colleagues) in classrooms
OTHER - Student Reimbursement (63212)	Related to Fire at N Brunswick
OTHER - Subscriptions/Dues (65140)	Dues for professional organizations/magazines
OTHER- Storage Rental (63033)	Storage Fees - used for business items
PERSONAL - Personal (00000)	Personal Expenses that will NOT be reimbursed
STUDENT - Food/Bev for Campus Function (64053)	Meals, Food and Beverages made available to the general public at DeVry Campus Functions
STUDENT - Graduation Expense (65163)	Account to be used explicitly for expenses associate with Student Graduation activities
STUDENT - Student Activities (65162)	Expense related to DeVry student funded organizations
STUDENT - Transcript Fees (65910)	Fees for money orders purchased to pay transcript request fees for students (not for colleague transcripts)
TRAVEL - Airfare via Best Travel (64002)	Airfare booked through Gant/Best Travel
TRAVEL - Airfare: NOT booked via Best (64002)	Emergency airfare not booked through Gant or Best Travel (or when conference offers special rate)
TRAVEL - Baggage/Luggage Fees (64002)	Fees for Baggage during airline travel
TRAVEL - Foreign Currency Trans. Fees (65321)	Account to charge for fees incurred by colleagues when traveling to other countries on business.
TRAVEL - Hotel/Lodging charges ONLY (64021)	Lodging Expense, including applicable taxes and gratuities to maids/bellman
TRAVEL - Internet Connection Fees (65121)	Internet connection fees charged by hotel
TRAVEL - Meals/Bev - Alone While Traveling (64053)	Meals/Drinks Alone During Overnight Business Travel
TRAVEL - Meals/Bev business discussions (64053)	Meals with other colleagues/clients/vendors to discuss business matters outside of your local metro
TRAVEL - Meals-Other (64051)	all other meals, food and beverage expenses
TRAVEL - Mileage (64032)	Mileage
TRAVEL - Other Travel Exp. Not Listed (64090)	travel expenses incurred which are not included in any other expense type
TRAVEL - Rental Car Charges (65301)	rental car charge
TRAVEL - Taxi/Shuttle/Public Trans. Fares (64031)	Fees/Fares for Alternate Transportation (include gratuity)
TRAVEL - Tolls, Parking, Gas (64031)	personal vehicle expenses; non-mileage

APPENDIX: TRAVEL TIPS AND QUICK REFERENCE GUIDE

BEFORE YOU GO

Passport – Apply for a passport or confirm that your passport has at least six months' validity from your planned date of return.

Dual nationals – Check if you are considered a national of any countries you intend to visit and if so, find out if holding dual nationality has any implications for your travel. You should contact the embassy, high commission or consulate of the country or countries you plan to visit to obtain this information.

Visas – Find out early what the visa requirements are for your destinations by contacting the nearest embassy, high commission or consulate of the countries you plan to visit. Collect documents required for your visa and other required entry documents (e.g. financial statements, program acceptance letter, immunization records, etc.). Apply for and obtain the visa.

Personal and travel documents – Leave a copy of your passport, itinerary, tickets, visas and insurance policy with your family or a friend and take a copy with you.

Travel health – See a doctor at least 6-8 weeks before you leave to discuss travel health issues and to allow time for any recommended vaccinations. For more information go to smarttraveller.com.

Medication – Check that any medications you plan to take with you are legal at your destinations by contacting the nearest embassy, high commission or consulate of the countries you plan to visit. You could consider carrying a letter from your doctor detailing what your medicine is, and that it is for personal use.

Travel arrangements – Complete Concur profile and make flight arrangements with TSI/BEST via phone. Obtain airline tickets, rail passes, etc.

Cultural Awareness – Review health, safety, and cultural issues of travel country

UnitedHealthcare Global Assistance ID Card– Make sure you understand what the UHC Global Assistance ID Card, what your UHC insurance plan covers and how it works.

iJet Mobile App & Quick Connect- Download on your phone prior your departure to become familiar with it: https://play.google.com/store/apps/details?id=com.ijet.iJet

Emergency procedures – Review and familiarize yourself with emergency procedures. Find out the 911 equivalent for your destination.

Travel Money – Organize a variety of ways of accessing money overseas, such as debit and credit cards, traveler's checks and cash in easily convertible currencies.

Travel documents to carry:

- Passport, visa(s), and photocopies
- · Airline tickets, rail passes, itinerary, Chartis card
- Driver's license and Emergency contact information

WHILE YOU ARE AWAY

Keeping in touch – Arrange options for staying in touch while overseas, and give indication of how often someone will hear from you.

Local/National Law – Always obey the laws of the country or countries you are visiting.

Drugs – Don't use, carry or get involved with drugs overseas. Consular assistance cannot override local law, and in some countries the death penalty or life imprisonment is imposed for drug offences.

Local customs – Respect local cultures and customs, dress appropriately and always ask permission before taking photos of people.

Customs and quarantine – Be aware of current quarantine import restrictions so that you avoid bringing back items of quarantine concern. You must declare all food, plan or animal products on your incoming Passenger Card. http://travel.state.gov/travel/tips/registration/registration/4789.html