



Travel and Entertainment Policy

(as of February 2024)

[Company name] has implemented this Travel and Entertainment Policy to establish standards and procedures for managing travel and entertainment costs and to ensure safe and comfortable travel for all employees while on company business. If a circumstance arises that is not specifically covered in this policy, then the most conservative course of action should be taken.

Objectives

- Ensure all employees have a clear and consistent understanding of policies and procedures for business travel.
- Ensure appropriate duty of care and safety while employee's travel.
- Provide employees with a good level of service and comfort.
- Maximize the Company's ability to negotiate discounted rates with preferred suppliers and reduce travel expenses.

Scope

- This travel policy applies to all employees worldwide. Regional differences will be noted where applicable.
- The employee is responsible for complying with the travel policy.
- The approver is responsible for accurately reviewing employees travel information and expense reports for compliance.
- The Company will reimburse employees for all reasonable and necessary expenses while traveling on authorized company business in accordance with this policy but assumes no obligation to reimburse employees for expenses that do not comply with this policy.

Expense Authorization

All trips must be pre-approved by your manager prior to any travel bookings or purchases. Any expenses that deviate from this policy must be approved by the CFO or CEO.

The most senior employee at any expense related activity/team event must pay for the activity.

Corporate Credit Cards

The company uses [Spend Platform] as its corporate credit card provider. Employees who are VPs and above are eligible for a physical and / or virtual card to be used for travel incidentals and team building events.

Corporate cards for non-execs who travel frequently will be considered on a case by case basis by the CFO.

[Spend Platform] knows who you are based on your email and phone number. You can submit receipts for expenses on your corporate card through text or email.

- Text example: If you are at dinner and pay with card, snap a picture of the paper receipt and text it to [HICARD (123-456)]
- Email example: If you take an Uber to the airport and you are emailed a receipt, forward it from your Company email to [receipts@card.com]

The receipts will be scanned and waiting for you when you log into [Spend Platform] at the end of your trip to submit your expenses (note: you still have to quickly review and hit submit at the end of each trip).

Travel Platform

The safety and wellbeing of our employees is of paramount importance. To best protect our employee interests, employees are encouraged to book all flights and hotels through our spend platform. Centralized booking will best allow us to inform you of changes in risk levels for certain countries and other situations such as

changes in health advisories. It will also allow us to know at any point in time where our employees are as part of our duty of care.

Hotel, flight, rail, and rental car pricing guidelines are visible when you are booking on the spend platform. Anything outside of the limits will require approval through the platform by a manager.

Payment for the airfare, hotel room and taxes will be covered by our centralized virtual corporate card program so employees are only required to carry the cost of incidentals on their personal credit cards. Empower will send any booking receipts directly to [Spend Platform] through an integration so you don't have to collect them on your own.

If you provide Empower with your loyalty program information, points will go to your account. Note that hotels or flights will not be booked outside of policy solely to satisfy an employee's membership program.

Submitting your expenses

Your immediate supervisor or the next higher management authority must approve all expense reports. You cannot approve your own, your peer or your superior's travel and expense report. The expense report approver is responsible for accurately reviewing expense reports for supporting documentation and compliance.

All global staff must submit an expense report through [Spend Platform's] expense reporting tool.

Please ensure that you submit your expense reports no later than 30 days after you complete your trip. Company reserves the right to decline reimbursement for any expense that is not submitted within 45 days of occurrence.

Please make sure that the following information is added when submitting your travel/entertainment expenses:

- Names of individuals present, titles and company name.
- Name and location of where the meal or event took place.
- Exact amount and date of the expense.

- Original receipts for all expenditures.
- Choose the most relevant category for the expense you are submitting.
- Expense reports may not be used for payments to any individual nor may they be used for payments to independent contractors.
- For employees using [Spend Platform], any expenses submitted in a foreign currency will automatically be converted to the base currency of the employee.

Expense reports that are incorrect, incomplete, or disorganized will be returned to the employee for completion and may result in a delay or non-reimbursement of specific items.

If you need to be reimbursed for an out of pocket expense or car mileage you can also do this through [Spend Platform] and do not need to send to finance or accounting via email.

If you have a receipt, you can take a picture or forward it to [\[reimbursements@spendplatform.com\]](mailto:reimbursements@spendplatform.com) from your Company email address.

If you don't have a receipt, like for car mileage, you can submit a request on the platform.

All reimbursements will be paid through [Spend Platform] directly to your account via ACH instead of through payroll.



Passports and Visas

Employees are responsible to obtain and maintain a current and valid passport issued for any international travel. Company will not reimburse the cost of obtaining or renewing a passport.

All passports must be valid for six months after the traveler's date of departure. Employees are responsible for obtaining and maintaining a valid passport if their position requires any international travel for Business.

In circumstances where business travel requires an employee to obtain a temporary business-travel visa, Company will reimburse all reasonable costs associated with obtaining the appropriate visa.

Frequent traveler program costs, including US Global Entry, TSA Pre-check, UK Registered Traveler, or any airline, rail, hotel or similar memberships will not be reimbursed by the Company.

Class of Travel

Employees are expected to travel coach/economy class for air travel and standard class on trains, unless otherwise authorized. Company expects employees to book the lowest reasonable fare – so if there are multiple economy fares, you are expected to book the least expensive fare.

Exceptions:

- If you are a member of the executive team who is flying more than 6 consecutive hours you may purchase premium economy or extended leg room.
- If your role requires you to fly more than 8 times a year (every 6 weeks on average) on flights each lasting longer than 6 hours, you are eligible to book premium economy or an exit seat.
- Red-eye flights can be booked on premium economy when you have a meeting first thing in the morning.
- If the cheapest fare requires substantially longer travel time (including extended transfer time of 4+ hours or 2+ connections) than another affordable economy fare, premium economy is permitted

Upgrades for Air Travel

If an employee wishes to upgrade, it will be done at the employee's own expense.

Frequent Flyer Clubs

Employees may use their frequent flier program benefits and collect points in the Company's corporate travel tool. However, employees may not incur additional expenses to fly with their preferred airline.

Travel Days that fall on weekends

In the case that an Employee is working abroad or traveling on a weekend or holiday, the employee will be entitled to a vacation day (day off in lieu) to be taken in a reasonable time frame (typically within 1 week from the end of travel). This should be processed through the People Operations team in conjunction with the employee's manager.

Combining Personal and Business Travel

Employees are allowed to extend approved business trips for personal trips, nevertheless this should not result in additional costs to the company. Any change/cancellation or any other cost including insurance claims that may occur during the employee's personal time will be paid by the employee only.

Car rental will be returned on the following day of the last working day till noon time. Employees will be entitled for reimbursement of one taxi expense in this case.

Spouse / Companion Travel

The Company will not reimburse spouse/companion travel expenses. Spouse / companion travel should not be booked using the [Spend Platform] or using our company corporate cards.

Tipping Guidelines

Tips should be consistent with local customs. For example, tipping is not customary in Japan.

Employees will only be reimbursed for a maximum of 20% in US of services rendered. Any tipping more than 20% will be at the employee's own expense.

International Bank Fees

When traveling abroad, we recommend using an international credit card to avoid bank fees. However if inaccessible, international bank fees may be expensed.

Airport and Train Station Parking

If taking public transportation to the airport will not be convenient or will be more expensive than taking your personal vehicle, please use your personal vehicle and you'll be reimbursed for your parking fee.

Taxi/Shuttle

Upon arrival at your destination, the use of airport shuttles, Uber, Lyft and rideshare are the Company's preferred method of transportation. Taxis may be utilized when rideshare is unavailable. Do not forget to request an original receipt. Public transport including undergrounds can also be used where appropriate and safe to do so.

When multiple employees are traveling together, if logical/reasonable, please try using the same vehicle. This is both good for the Company and the environment!

Car Rental

Car rental must be justified as an economic need and not a matter of personal convenience and require prior approval from your manager. Car rentals should be booked in [Spend Platform].

As a general guideline, all employees should:

- Use rental cars only when other means of ground transportation are unavailable, impractical or more costly.
- Use rental cars when traveling with a large volume of equipment or when traveling with other employees
- Rent the least expensive car type that meets your business needs
- Ensure that the rental car is returned with a full tank of fuel if more economical to do so. Actual fuel costs are reimbursable while using a rental car
- All fuel receipts should be submitted via the normal expense process.

- Please request and pay for additional travel insurance at point of rental (you can then expense this in per normal expense procedures).
- You should only rent a car for work-related travel if you are over 21 years old and have a clean driving record.
- Company does not reimburse for unnecessary car rental upgrades.
- We ask that you use your best discretion, so the following arrangements should be made prior to returning a rental car:
 - Car should be returned to the original rental city unless approved for a one-way rental.
 - Make sure to inspect the condition of the car, paying special attention to existing damages.
 - Return the car on time, to avoid additional hourly charges.

If a rental car is necessary, tolls will be reimbursed.

Personal Car

Employees may use their personal car for business purposes if it is less expensive than alternative means of transportation (e.g. taxi, rental car, etc.). Employees using their personal car for Company business must maintain automobile insurance coverage levels in accordance with their required national standards.

Employees may use their personal vehicle for long distance travel providing the trip is pre-approved by their manager.

Employees using their personal car for business travel will be reimbursed for actual mile / kilometer driven to and from the business site at the local, official standard auto mileage reimbursement rate. This rate covers all costs, including gas, maintenance, wear and tear on the vehicle, tolls and insurance. Mileage can only be claimed for the excess mileage/cost traveling to and from a work location to an off-site location.

Commuting from home to the office and back is not considered business travel for those registered for Office and Flexible working.

You can submit your mileage for reimbursement on the [Spend Platform].

Hotel Overview

The Company has negotiated special rates with hotels in some cities which can be seen in [Spend Platform]. Please book at these hotels wherever possible. If a “Company Preferred” hotel is not available employees should target to book a 3-star business hotel, where possible, at the lowest rate available for a standard room.

Home and Apartments booked through Airbnb or VRBO are an acceptable accommodation method if the cost is the same or cheaper than a comparative hotel.

Employees may book a hotel for a meeting if it is being held more than 60 miles from their primary residence.

Employees are encouraged to book a reasonably priced, single-occupancy room for themselves. Guideline prices per night are included in the spend platform.

Hotel Expenses

The following expenses are reimbursable:

- In room Wi-Fi
- Hotel gym
- Room service (provided it is within the meal limit below)
- Laundry services if traveling for more than one week (reimbursed for up to \$75 USD per week or equivalent in local currency)
- COVID tests

The following expenses are not reimbursable:

- Video/In-room entertainment services
- Mini-bar expenses
- Valet parking
- Child care, babysitting, house sitting, pet sitting, kennel charges
- Evening or formal wear expenses
- Haircuts and personal grooming

Early Arrival

Employees that are traveling more than 8 hours may arrive a day before.

If you are scheduled to land before 6:00am, and an early check in is not available then an extra night is approved.

Cancellations, No Shows and Changes

While the Company will try to negotiate flexible cancellation policies at corporate hotels, it is the employee's responsibility to ensure that trips are canceled as soon as it is known that travel will change or not take place to minimize cancellation and no-show fees.

Employees must notify their managers of any travel cancellations. If possible, a refund should be initiated if the ticket or hotel has been arranged. Travelers should also enquire about using the same ticket and/or reservation for future travel.

Employees will be held responsible and will not be reimbursed for "no-show" charges.

Any changes to pre-booked travel requires manager approval.

 **Meals and entertainment.** The company will reimburse employees for meals and entertainment deemed reasonable and customary.

The following per person daily meal expense guidelines apply (and are inclusive of hotel mini bar charges)

- Breakfast - \$20 USD or less country equivalent
- Lunch - \$25 USD or less country equivalent
- Dinner - \$50 USD or less country equivalent

Client Entertainment

This includes entertainment expenses including events such as a client breakfast/lunch/dinner or different social events where a business discussion takes place.

We trust your judgment and are sure you will choose the most appropriate way to treat your customers.

- USA – Up to \$100 USD per person per outing

Any entertainment that is anticipated to be over \$1,000 USD should be brought to the CFO. The excess amount will be approved if the person(s) entertained have an actual business or potential relationship with The Company.

Please do not forget to collect all the information needed for customer entertainment. The expense report should include the date, place, person(s) present, business reason for the expense and the total cost including tips and taxes, supported by an original receipt.

Conference Registration Fees

If the conference fee was not prepaid directly by the company, the Company will reimburse registration fees, including business-related banquets or meals that are part of the conference registration. Original receipts to support the payment are required.

Registration fees paid directly by an individual will not be reimbursed until the conference is completed.

What internal meetings are eligible for travel?

- **Small Hands** – Strategy/roadmap planning at the team leadership level (no more than twice times per year)
- **Learning / Training events** – Training will be delivered remotely by default, but sometimes in-person events may be required. Any training event that requires travel will be communicated in advance to attendees.
- **Strategic project planning** – A limited number of particularly complex, global projects may benefit from bringing together a part of the team for alignment – if so these are reviewed point in time by the owning executive.

Best Practices for travel-eligible internal meetings

- The location of the event should be determined based on where the majority of the team attendees sit, in order to minimize travel footprint
- Organizing hotels, meeting rooms and meals is the responsibility of the team
- For team building purposes, we recommend that all traveling members should stay at the same hotel
- Employees should coordinate their flight schedules to stay the full day of onsite meetings and not leave early to make the most of the investment in travel

Small Hands

Small Hands are an opportunity for teams to collaborate and strategize for the quarter. Each team is entitled to four total Small Hands meetings per year where expenses are acceptable. Two of these small hands may be in person and two may be virtual.

Virtual Small Hands

Meals may be expensed during the hours that the Small Hands takes place, and will follow the daily meal allotment. (Ex: a virtual Small Hands from 8 am - 10 am would include breakfast only, as $\frac{1}{3}$ of the daily meal allowance).

Onsite Small Hands

Teams are entitled to travel to gather up to twice per year, and unless there's a good reason, aim to minimize the number of people needing to travel.

For Onsite Small Hands, those traveling will use their meal expense reimbursements.

Company Sponsored Events

When attending Company sponsored events, e.g. All Hands, where meals are provided as part of the event, any other meal expenses will not be reimbursable.

Cell phone Usage

When traveling with your cell phone it is expected that you will add a travel plan to your package. All reasonable travel plans for business travel will be reimbursed. The cost of any such roaming plan is expected to be less than USD \$20/day (or equivalent in local currency).

Other Telephony and Internet Charges

Air-phone telephone use will not be reimbursed.

Hotel telephone services will not be reimbursed.

In-flight internet

In-flight internet for business purposes will be reimbursed up to \$30 USD on flights that are more than 2 hours.

The following expenses are non-reimbursable

- Parking tickets or other fines
- ATM cash withdrawals fees
- Delinquency fees/Finance charges for personal credit cards
- Excess baggage charges unless approved for a specific business purpose
- Expenses related to vacation or personal days while on a business trip
- Loss/theft of personal funds or property/Lost baggage
- Avoidable "No Show" charges for hotel or car service
- Non-compulsory insurance coverage
- Airline, Rail, Hotel or Rental car upgrades
- Repairs to baggage or personal belongings due to accidents. These amounts should be covered by your travel insurance policy
- In-room entertainment/mini-bar charges

Insurance

Company's employees are insured for business travel under Company's travel insurance policy.

Accidents

Any employee involved in an accident while on Company business should report the accident immediately to:

- The car rental agency (if applicable)
- Your manager
- VP of People Experience

In the case of any vehicle accident, the police (or equivalent agency) should be contacted, and a report should be requested. Do not place blame or admit fault to the other driver. Reserve your comments for the police. Be sure to obtain names and other pertinent information of any witnesses, as well as the other driver(s).

If an employee has an accident with their personal vehicle while on Company business, the employee's insurance coverage is considered primary.

Onboarding new hires:

New hires that start remotely should be onboarded virtually. When a new hire starts remotely, they should not fly to the location of the manager (or vice versa), just for the purpose of onboarding. Meeting in-person is important, but should be coincided with other business/leadership meetings as they occur naturally. New hires will be integrated with local team members and into the culture of our domestic offices through our new hire induction process.

Work from Home Stipend:

Employees are eligible for \$100 worth of supplies per calendar year, to be expensed through the spend platform. Funds may be put towards:

- Pens / Pencils
- Paper
- Printer Ink
- Printer
- Headphones
- External Monitor