

Company

TRAVEL & REIMBURSEMENT POLICIES & PROCEDURES

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SCOPE

This is a statement of Company policy on travel and related business expenses and is intended to establish equitable standards and achieve consistent and fair treatment of all employees who incur such expenses.

The Company recognizes that reasonable and necessary expenditures by an employee on behalf of the Company may be reimbursable to the employee. Reimbursement is not intended to provide supplemental income to any employee. The employee is expected to use the Company funds with discretion and only to the extent necessary to enhance and further the interests of the Company.

All employees, supervisors and managers share a basic joint responsibility for the use of good business judgment in transacting the Company's business. It is the employee's responsibility to review the travel policy prior to making business travel arrangements.

GENERAL POLICY & GUIDELINES

- The employee incurring the expense and the manager approving the expense are primarily responsible for ensuring compliance with these policies. The Company has the right to audit expenses submitted for reimbursement and may reject (partially or in full) requests for reimbursement on any expenses that do not comply with these policies and guidelines. **Employees who misrepresent requests for reimbursement of business or travel related expenses may be subject to disciplinary action, up to and including termination of employment. Any exceptions to the policy, whereby reimbursement would be greater than otherwise permitted by these policies and guidelines, must be approved by the Chief Executive Officer (CEO) or Chief Financial Officer (CFO).**

TRAVEL MANAGEMENT COMPANY

Travel Incorporated is the corporate designated travel agency, and all travel arrangements must be coordinated through Travel Inc., via telephone or the online booking tool, Concur. This also applies to client reimbursable travel.

Traveler reservations must be booked via Concur or by calling Travel Inc. For travel reservations made online utilizing Concur, an eProfile must be completed prior to booking travel (that includes BOTH the traveler and employees booking on behalf of the traveler). Instructions on eProfile are below. Concur is available 7 days a week/24 hours a day. All changes for reservations booked on Concur must be made via telephone or email to Travel Inc. at:

During normal business hours Monday – Friday; 8am – 6pm EST

Company.travel@travelinc.com

Local: 770-291-4254

Toll Free: 800-246-7129

After hours

Toll Free: 800-246-7129

Travel Inc. charges service fees that will be billed directly to your branch:

- Agent or Concur online transaction fee for Car or Hotel only reservation is \$7.00.
- Agent call-in Transaction fee for domestic or International air travel is \$ 26.50.
- Concur online transaction fee for airfare is \$10.50 for Southwest or \$9.50 for all others.
- Concur online transaction fee with agent assistances is \$17.50 for Southwest or \$16.50 for all others.
- There is no additional service fee charge for car or hotel reservations that are included with an airline reservation and ticket.

eProfile:

Prior to commencing travel for the first time, all travelers must complete an eProfile. Company travelers may access eProfile via the Travel Portal from the Company Home Page or the following link:

<http://ctp.travelinc.com/?CID=%24%5EQ3Jhd2ZvcmQ%3D>

In the Travel Portal, under *eProfile*, click on *Create New eProfile*. This will bring up the eProfile form. Upon completion of the eProfile, click *Save My Profile* prior to submitting. Employees will receive a confirmation e-mail from Travel Incorporated that contains a link to activate the eProfile. Travelers are responsible for keeping their profiles updated.

Booking Reservations:

Once a traveler has their eProfile, the traveler may access Concur and begin processing travel arrangements.

You may access Concur from the Company Home Page under the *Travel Portal* in *Branch Applications*, then select *Concur – Online Booking Tool* on the left side of the page. To access Concur you must log on using the following information:

COMPANY NAME: *Company*

USER NAME: *Last name (space) first name* PASSWORD: (Enter your *eProfile* password)

You may also access Concur on the Travel Inc. website: <http://www.travelinc.com>

Under Login, click on Client Login, Traveler/Admin. Under item II, click *Personal Travel Portal*; Company is *Company*, User Name is your *last name, space, first name*. Password is your eProfile password.

AIR TRAVEL

Air travel reservations should be made as far in advance as possible (or a minimum of 14 days) to take advantage of available discount fares. When a reservation has been completed, either online or via calling an agent, travelers will receive an eItinerary from Travel Inc. Upon receipt of the e-Itinerary from Travel Inc., travelers are responsible for reviewing the itinerary and reporting any discrepancies to Travel Inc. immediately. **If additional expense is incurred for discrepancies reported after 24 hours, the expense will be the responsibility of the traveler.**

Traveling employees may retain frequent flyer program benefits. However, participation in these programs must not influence flight selection, which would result in incremental cost to the Company beyond the lowest available airfare, as defined in this Policy. Tickets obtained with mileage points and used for business travel will not be reimbursed.

Delta Air Lines and Southwest Airlines are the company's preferred airlines. Travelers are expected to utilize these airlines whenever possible.

Documentation

Travel Inc. e-Itinerary/invoice, with a ticket number, must be included with your Travel and Expense request for reimbursement of airfare expense. Travel Inc. will forward an e-Itinerary/confirmation immediately after the Concur reservation is submitted for purchase. This confirmation will not include a ticket number, and is not valid for expensing. When the ticket is issued, an e-Itinerary/ invoice will be forwarded and will include the ticket number. **Airline tickets purchased outside of Travel, Inc. may be subject to a maximum reimbursement at 85% of the total expense.**

Method of Payment

Airline tickets purchased through Travel Inc. will be charged to the credit card in the traveler's eProfile. The American Express Corporate card is the preferred payment method for all travel expenses.

Acceptance of Lowest Fare

Travelers are expected to accept the most economical fare available that meets the business objective of the trip. Travelers should be receptive to suggestions for connections, alternate airports, routings, and flight times within a two-hour window, to take advantage of significantly lower airfares. Travelers declining lower airfares must provide a reason for not utilizing a lower airfare. **Carrier preference is not considered a justified reason.** Lost savings opportunities will be reported to management.

Class of Service

All employees are required to fly coach class and accept the lowest available fare for all U.S. domestic travel (Canada should be treated as U.S. domestic travel).

Business Class domestic travel is approved for E13 or above for any flight segment that is scheduled to exceed four hours travel flight time.

Business Class Travel is approved for E13 or above traveling internationally any time a flight segment is scheduled to exceed four hours travel flight time. Any segments of the trip scheduled for less than four hours travel flight time will be booked coach class.

Economy Comfort, Premier Coach and similar economy class services are approved for any international flight exceeding four hours of flight time. Any exceptions must have prior approval from the business unit EVP.

Any additional exceptions must be approved by the CEO or CFO.

Seat Upgrades

Discretionary seat assignment/change/upgrade fees will not be reimbursed.

Travelers are allowed to use their frequent flyer status or points to obtain preferred seating as long as there is no additional cost to the company.

Cancellations/Voids

If a trip is cancelled, Travel Inc. should be notified immediately. Failure to cancel flights with non-refundable tickets may result in forfeiture of the ticket. Tickets that are canceled/voided within 24 hours of ticketing can often avoid a credit card transaction. Tickets canceled after 24 hours (depending on the type of fare) will have a credit card charge to the company and a resulting “credit” that will have to be used within 12 months of the original ticket issuance. The value of the credit is often reduced by airline exchange & service fees.

Restrictions

- Pursuant to IRS regulations, non-business legs of a trip (i.e. travel to other than the business destination) are not deductible; therefore, the company will not reimburse them.
- Travelers should balance the convenience and cost savings of traveling in groups against the associated risks. If the exposure to the company or individual business organizations outweighs the convenience and cost savings, employees must arrange travel separately or in smaller groups. Whenever possible, the company will alert travelers and management of potential risk.
- Employees may not pilot a private plane while on Company business.
- Employees may not fly on a corporate or private aircraft unless the aircraft carries a FAA Standard Category Airworthiness Certificate; the pilot is certified; and evidence of no less than \$10 million of Aircraft Liability (including Passenger Liability) insurance on the aircraft is produced.

Group Travel Guidelines for Officers

No more than two (2) officers, including the CEO, may travel on the same airplane together. The CEO and CFO may not travel on the same airplane together. Executive officers may not travel with more than two (2) of their direct reports. No more than two (2) officers from any one business group may travel together on the same airplane.

Airport Security

For the latest security procedures please click on the following link to The Transportation Security Administration: <http://www.tsa.gov>

Passports, Visas & Vaccinations

For employees travelling overseas, please ensure that you have sufficient unexpired time on your passport. Some countries now require a minimum of 6 months remaining on your valid passport.

When booking international travel, employee must verify whether a Visa is necessary for entrance into the destination country. Travel Inc. should be contacted for assistance in obtaining necessary Visas for international travel.

Employees travelling overseas, must ensure that they have the necessary vaccinations.

TRAIN TRAVEL

All train reservations must be booked through our designated travel company, which is Travel Inc via customer service at 800-246-7129.

Train travel reservations should be made as far in advance as possible to take advantage of available discount fares. Traveling employees may retain frequent traveler program benefits. However, participation in these programs must not influence carrier selection, which would result in incremental cost to the Company beyond the lowest available fare, as defined in this Policy. Tickets obtained with mileage points and used for business travel will not be reimbursed.

Documentation

Copy of itinerary and **ticket**, must be included with Travel and Expense Requests for reimbursement of train travel expense. **Train travel will be reimbursed at a maximum reimbursement at 85% of the total expense if both the itinerary and ticket are not provided.**

Acceptance of Lowest Fare

Travelers are expected to accept the most economical fare available that meets the business objective of the trip. Travelers should be receptive to alternative routes to take advantage of significantly lower fares.

Class of Service

All employees are required to travel coach class.

Business Class train travel is approved for E-13 or above for any train segment that is scheduled to exceed four hours travel time. Any segments of the trip scheduled for less than four hours travel time will be booked coach class. Business Class train travel is also approved for those 'express' trains when coach class is not available.

Any additional exceptions must be approved by the CEO or CFO.

Restrictions

- Pursuant to IRS regulations, non-business leg of a trip (i.e. travel to other than the business destination) are not deductible: therefore, the company will not reimburse them.
- Travelers should balance the convenience and cost savings of traveling in groups against the associated risks. If the exposure to the company or individual business organizations outweighs the convenience and cost savings, associates must arrange travel separately or in smaller groups. Whenever possible, the company will alert travelers and management of potential risk.

Group Travel Guidelines for Officers

- No more than two (2) officers, including the CEO, may travel on the same train
- The CEO and CFO may not travel on the same train together
- Executive officers may not travel with more than two (2) of their direct reports
- No more than two (2) officers from any one business group may travel on the same train

PERSONAL AUTO AND RENTAL CARS

Personal Auto

- Mileage allowance in lieu of actual expense, reimbursement for gas, oil, or tires will be the IRS published rate for allowable reimbursement.
- Travelers should compare the cost of renting a vehicle (including taxes, fees and gas) vs. the cost of mileage reimbursement when planning a trip. Car rentals are generally less expensive when the total trip mileage exceeds 150 miles.
- Normal commuting costs by auto, train or bus to the office are personal expenses not subject to reimbursement, regardless of miles traveled.
- Whenever feasible, business trips beyond 250 miles one way should be by air travel. If personal auto is used, extra meals, lodging costs and auto reimbursement will be limited to the lesser amount of the cost normally incurred using the class of travel routinely authorized or of the expenses related to personal auto travel. Business miles are the excess of business miles driven during the day over commuting miles. Round trip miles driven from home to the regular place of work are commuting miles.
- Employees utilizing their personal auto for Company business must carry at least bodily injury and property damage liability insurance limits as required by the state in which the vehicle is garaged. Minimum bodily injury and property damage liability coverage requirements are \$100,000/\$300,000/\$50,000.
- **If in an accident involving bodily injury or property damage while driving a personal vehicle on Company business, immediately notify the driver's personal auto liability insurer and Company Claims Alert at 877-346-0300.**

Rental Cars

Car rentals are to be held at a minimum and used only when they are the most economical means of transportation. Car rentals in metropolitan areas may not be necessary, as less costly modes of transportation are often available.

- Car rental reservations must be made through Travel Inc. Reservations at the negotiated corporate rate will be confirmed with preferred rental vendors Avis and Budget.
- **Car rental reservations booked outside Travel Inc. may be subject to a maximum reimbursement at 85% of the incurred expense.**
- Cancellations and changes should also be made through our authorized travel provider Travel Inc.
- Employees should request intermediate/mid-size cars.
- Minimum age requirement under the Avis and Budget agreements is 21 years of age. With non-contracted vendors, the minimum age requirement is 25 years of age.
- All renters must have a valid driver's license and a major charge card.
- All employees who intend to drive the rental vehicle must be added to the contract before accepting the vehicle.
- **Collision Damage Waiver is included with the contracted rate for Avis and Budget business rentals; and travelers should decline the CDW when renting a vehicle from Avis or Budget for business purposes. If an Avis or Budget vehicle is not available, the traveler should purchase the CDW coverage at the time of rental. For all travel outside of the United States, the CDW coverage should be purchased at the time of rental.**
- It is the employee's responsibility to confirm the proper CDW coverage has been included with the rental agreement before accepting a vehicle.
- If traveling outside the United States, drivers must purchase the CDW optional coverage. If any accident occurs outside the United States, it must be reported in the jurisdiction in which it occurred.
- It is the employee's responsibility to confirm the proper contract rate is being charged before accepting the vehicle.
- Check for any previous damage before entering the vehicle. Document your findings with the agency before driving away, or request another vehicle.
- Be sure the gas tank is full before driving away.
- You must refill the gas tank as required prior to returning the rental car to avoid inflated refueling charges by the rental agency.

- Employees should verify the charges on the invoice before accepting it to ensure that the correct rate was obtained and that charges were not made for services not used.
- The American Express Corporate card is the preferred payment method for all car rental expenses.

Avis Preferred Service – Discount Number: A091900

Under our agreement with Avis, Preferred Service is available at no charge to our travelers. Your personal “WIZARD” number allows you to board the Avis courtesy bus directly from your flight, give the driver your name and your car will be waiting when you arrive at the Express facility. With Avis Preferred, at over 1,200 locations, you will be dropped right at your car.

To apply for an Avis wizard number, or to upgrade your current wizard number to Preferred Service, click:

<http://www.avis.com/AvisWeb/html/bridge/corp/go.html?A091900>

Upon receipt of an Avis wizard number, the traveler should immediately add this number to their eProfile, in order to receive the benefits of the program.

Budget Fastbreak Service – Discount Number

Fastbreak is Budget’s express rental service. When you arrive at a *Fastbreak Choice Location* to pick up your vehicle, you just choose your car from a special group and just get on the road. At a *Fastbreak Counter Location*, you show your driver’s license at the special counter, get your keys and you are on the way to your car.

To apply for a Budget Fastbreak account, click:

<http://www.budgetcarrental.com/budget/fastbreak/index.html?Y029400>

Upon receipt of a *Fastbreak* number, it should be entered onto the traveler’s eProfile, in order to receive benefits of the program.

Rentals Made Through Non-Preferred Vendor

- If employees choose a rental vendor other than Avis or Budget, and the rental fee exceeds the corporate rate for an intermediate car, employees will only be reimbursed up to the corporate rate. *Rental cars from vendors other than Avis and Budget do not carry corporate insurance coverage.*
- If an Avis or Budget car is not available and you rent from another vendor, you should purchase the CDW. Employees should note in the appropriate comments section of their expense report the reason another vendor was used, to facilitate the approving manager's review, allowing for reimbursement at the higher rate.

Accident Reporting - Rental Cars

In case of an accident while driving a rental car on company business, take the following steps:

- Secure all possible information at the scene of the accident, i.e., names and address of other drivers involved their insurance carriers, names and address of witnesses.
- Notify the rental company, even if the accident did not result in any personal injury or property damage. Accidents with Avis vehicles should be reported to: 800-354-2847. Accidents with Budget vehicles should be reported to: 800-551-5998.

- Obtain copies of any police citations – or the appropriate contact information to obtain police documentation in the future. Include police jurisdiction, phone number, officer involved and e-mail/website to obtain information.
- The accident must be immediately reported to Company Claims Alert at 877-346-0300.

BUSINESS MEALS

General Policy

The Company will reimburse employees traveling on business for regular meal costs that meet the guidelines stated below.

- Employees are expected to dine at respectable establishments with reasonable/moderate prices. This includes taking advantage of company dining facilities, cafeterias, coffee shops and grills or other reasonable establishments in close proximity. Employees will not be reimbursed for meal expenses that are lavish or extravagant.
- Travelers must limit business meal costs to an acceptable level that is customary and is reasonable for the location/area per day, excluding tax and gratuities. Receipts are required for meal expenses in excess of \$25 including room service and dine-in restaurants charged on the hotel bill. **Receipts must include itemized charges or only \$25 will be reimbursed.**
- Gratuities for meal service of total billing must be within reasonable, acceptable and customary levels.
- Alcohol expenses outside of entertaining clients will not be reimbursed and must be backed out of the total meal cost by the Traveler when submitting a Travel & Expense Report.
- When entertaining clients or in gatherings with employees, we have a responsibility to act reasonably and professionally in the manner in which we entertain. Your entertainment expenses, particularly the consumption of alcohol, will be monitored for reasonableness and professionalism. Alcohol will only be reimbursed for client dinners and pre-approved company sponsored events, i.e., Circle of Excellence dinner. Employees dining alone or with other employees will not be reimbursed for alcohol, unless there is a legitimate business purpose and it is approved by the responsible officer.
- In travel situations or off-site meetings where separate checks are inappropriate, the most senior level person shall be responsible for payment of meals and for submission of the total expense on their expense report. Any person that benefits from the expense cannot be the approval authority for it.

Receipts

Original receipts are required for expenses over \$25. Employees are required to submit appropriate receipts for all meal expenses in excess of \$25. The receipt must be in the form of a charge slip or cash register type receipt, unless the vendor itself can only produce a handwritten or typed receipt. **The receipt must be itemized showing the date and amount of the expenditure, items purchased, name and location of the restaurant.** This includes room service and dine-in restaurant meals charged on the hotel bill. The bottom portion/stub from a bill is not acceptable. Employees are required to provide a legitimate business purpose for each meal along with their receipts.

Reimbursable Meals

- Meals costs incurred while conducting Company business are reimbursable under the following conditions:
When business travel requires overnight lodging.
- Necessary and reasonable business entertainment (see section on Entertainment).
- Authorized attendance at special outside group affair.
- When an employee on overnight business travel is invited to the home of a friend, business associate or a relative for dinner, costs incurred for a traditional guest thank you gesture are permissible. This expenditure will be reimbursable only under the following circumstances:
 - Due to the overnight lodging, a dinner would have been incurred
 - The reimbursement amount allowed is not to exceed \$15.00. There is a \$30.00 maximum reimbursement limit for two or more occasions per trip
 - Receipts are mandatory for reimbursement and must be submitted to support the claim
 - The actual expenditure should be recorded in the dinner column with explanation "third party gift" noted.
 - Cash or any cash equivalent gift (such as gift cards) will not be reimbursed.

ENTERTAINMENT

The company will reimburse employees for necessary business entertainment expenditures.

Definition

Business entertaining must meet the following Internal Revenue Service requirements:

- Must occur in a place or surroundings conducive to a business discussion.
- Must have been before, during or following substantial and bona fide business discussions.
- Must represent an active effort by the employee/company to obtain income or some other business benefit by the business discussion that the entertainment precedes or follows.
- Must be directly related to or associated with the active conduct of the business of the company.
- Type and frequency of entertainment should be appropriate and the expense incurred commensurate with the business purpose involved and the benefit derived.
- Entertainment expenses greater than \$2,000 require the pre-approval of the Business Unit Head. Entertainment expenses greater than \$5,000 require the pre-approval of the Chief Executive Officer.

Business Entertainment

Business entertainment includes the cost of meals, refreshments and other necessary expenses incurred in entertaining customers or other outside persons for the purpose of furthering an essential business relationship or purpose.

- Company dining facilities, whenever available, should be considered when entertaining a luncheon guest.
- A subordinate employee is not to pay for entertainment of a group when the manager/supervisor is in attendance. The senior member should pay for all charges.
- Should an occasion occur that prevents the senior person in attendance from handling the expense, the paying employee's Travel and Expense request must be presented to the senior person's superior for approval. Any person that benefits from the expense cannot be the approval authority for it.
- **Under no circumstances may Company employees provide meals, entertainment or gifts to employees or representatives of governmental entities, whether or not reimbursement is sought. Company will not reimburse any employee who provides meals, entertainment or gifts to employees or representatives of governmental entities.**

Employee Entertainment

Incurring an entertainment expense of other employees is considered an exceptional or unusual event. The use of the business meal is generally an accepted approach in furthering the Company's interest. When done, it should be given careful consideration and used sparingly, and the expense incurred should be commensurate with the company benefit achieved from providing such an event.

Documentation

Original receipts are required for entertainment expenses exceeding \$25. An itemized receipt must be in the form of a charge receipt or cash register tape. **The receipt must be itemized showing the date and amount of the expenditure, items purchased, name and location of the restaurant.** The bottom portion/stub from a bill is not acceptable. IRS regulations require complete and precise documentation of all business entertainment. This documentation is to include:

- Date
- Location of entertainment
- Names, titles, firm of attendees
- Nature or business purpose of meeting
- Dollar expenditure

LOCAL TRANSPORTATION AND PARKING

Local Transportation

Travelers should utilize complementary hotel and airport transportation whenever available. Reimbursement will be made for necessary bus, taxi and limousine service when cost justified. Many hotel properties have included local transportation (to and from airport, to and from office) in their nightly room rate. Where possible, these services should be utilized. The most cost-effective means should be used when traveling between home and the airport. The cost of mileage and airport parking should be compared against the cost of limousine or taxi service.

Airport Parking

Many airports provide both short and long term parking areas. Long term parking areas should be considered for trips of two or more days unless personal safety is a concern because of the time of departure or return or time constraints preclude its use. Short-term parking should only be used for one-day trips. Airport valet parking is not fully reimbursable. Airport valet receipts will only be reimbursed at the short-term parking rate.

LODGING

Reservations

- Moderately priced hotels should be selected in the general location where business will be conducted. A Marriott Courtyard Hotel or similar properties should be selected, or utilized as benchmark for hotel selection.
- Policy provides reimbursement for a standard single room plus tax and local fees at a preferred hotel.
- Travel Inc. or Concur will secure the lowest available rate at the time the reservation is booked. When checking into the hotel, the traveler should always ask if any special or lower rate is available.
- Should a travel delay occur necessitating an overnight stay, the traveler must first attempt to secure complimentary lodging from the airline. If unsuccessful, the traveler should contact Travel Inc. at 800-246-7129 to book a hotel reservation.

Preferred Hotels

Negotiated hotel rates are based upon the volume the Company is able to direct to a specific facility. The number of preferred hotels in an area is limited in order to direct business to those hotels for greater negotiating leverage. Travelers are to use preferred hotels where available.

The following preferred hotels are:

Atlanta Support Center:

Hyatt Place Perimeter Center

Marriott Atlanta Perimeter Center

Crowne Plaza Ravinia

Sunrise, FL:

Renaissance Plantation – Fort Lauderdale

Hyatt Place -Plantation

Lake Zurich/Long Grove, IL:

Holiday Inn Express, Palatine, IL

Schaumburg, IL:

Hyatt Place-Schaumburg

Hyatt Regency-Schaumburg

Dallas, TX:

Crowne Plaza Market Center

Garden City, NY:

Hilton Long Island Huntington

Cancellations

Whenever possible, hotel cancellations must be made by midnight the day before the date of arrival (unless otherwise stated on the itinerary). Hyatt and Marriott hotels will charge a no-show fee if the room is not canceled at least the day before arrival. It is the traveler's responsibility to cancel the reservation on Concur, contact Travel Inc. or the hotel directly to cancel the reservation. A cancellation number should be obtained to avoid a no-show penalty (if the reservation is canceled in Concur, the cancellation number is captured in Travel History). No-show charges are the responsibility of the traveler and are not reimbursable unless business needs dictate a last minute change in plans.

Method of Payment

The American Express corporate card should be used for hotel and all other business related travel expenses. **Direct billing to the company is not authorized.**

Documentation

- A Travel Inc. e-Itinerary with hotel reservation should be included when expensing hotel receipts for reimbursement. Hotel expense for reservations coordinated outside the policy is subject to a maximum reimbursement at 85% of the actual expense.
- Travelers attending conventions should attach a copy of the registration for the event to their receipt in order to receive full reimbursement. When lodging reservations for a convention are booked through the convention's housing bureau, a Travel Department e-Itinerary is not required for full reimbursement.
- Itemized original receipts are required for lodging expense. Lodging expense should be paid by the traveler and reported in the lodging section of the expense report.
- Any other reimbursable expenses must be broken out and reported under the appropriate category by day. Separate entries on the Expense Summary Report should be made for meals or other expenses incurred and billed to the room.

Third Party Lodging

Occasionally a fellow employee, business acquaintance, friend, or relative may provide an employee lodging without charge. When this occurs, it may be appropriate to offer the host (or hostess) a small token of appreciation. This expenditure is reimbursable only under the following conditions:

- The Company benefits from cost savings.
- A receipt of purchase for the gift is mandatory as an unusual item of expense.
- The gift of appreciation is limited to \$50 for overnight or \$80 maximum if two or more nights per trip.
- The expenditure incurred is to be recorded under "Lodging" on the Travel and Expense request with the explanation "third party" noted. If no entry is made regarding an expense for a night's lodging, an explanation as to the reason is to be provided for completeness in reporting.
- Cash or any cash equivalent gift (such as gift cards) will not be reimbursed.
- The third party lodging gift may not be combined with the meal gift. Travelers will only be reimbursed for one gift expense per trip.

WEEKEND STAYOVERS

Travelers who wish to extend their stay over a weekend for leisure time may do so. However, non-business related expenses incurred for weekend travel will be the responsibility of the traveler.

OTHER TRAVEL EXPENSES

Value Added Tax (VAT)

- Travelers to foreign countries should obtain a written receipt specifying the VAT amount for all expenses.
- This supporting documentation must be submitted with the Travel and Expense request.
- A credit card receipt is not sufficient documentation for reimbursement of this expense.

Telephone Expenses

- Employees traveling on Company Business are permitted a reasonable number of personal telephone calls. Employees should make an effort to place calls at times when the lowest rates are in effect.
- Computer/laptop charges: Use of phone lines for business related computer activity while traveling is permitted for a reasonable charge.

Laundry Service

- When an employee is on business travel, spending a minimum of four consecutive nights away from home, the company will reimburse laundry or dry cleaning service up to a maximum of \$50 per seven nights stay.

Expenses of Employee Spouses at Business Meetings

As a general rule, the company does not reimburse additional expenses incurred by a spouse when traveling with an employee on a business trip.

- Expenses attributable to the spouse will be reimbursed when the spouse's accompaniment is deemed necessary and/or will serve a bona fide business purpose.
- Advanced written authorization from the CEO must be secured in advance for the spouse's attendance. A copy of this authorization must be included with the receipts covering the spouse's expenses and noted on the expense report form.

NON-ALLOWABLE EXPENSES

The Company's policy is to reimburse the employee for all reasonable and necessary expenses incurred in conducting company business. However, there are specific types of expenses that are considered to be of a personal nature, and are not reimbursable.

- Babysitting services
- Barber, Manicurist, Shoeshine Services, Masseuse
- Books for personal growth
- Briefcases or similar items for personal use
- Changes for airfare scheduling changes (after initial ticketing) if changes are made for personal reasons
- Computer software - this is to be handled according to normal purchasing procedures
- Contributions of company funds to public officials or candidates for public office
- Home Internet/DSL Service (only full time work from home employees qualify for reimbursement)
- Hotel no-show charges
- Laundry service in excess of policy
- Office equipment and stationery supplies such as pens and file folders that should normally be ordered through the regular purchasing procedures
- Personal charge or credit card annual membership dues, fees or charges, including liability insurance for lost card use by third parties
- Personal reading matter or services
- Pet kennel fees
- Repairs, maintenance, or insurance on personal cars
- Special room service, in-room movies
- Stop payment fee on personal checks made payable to the Company
- Sundries such as cigarettes, toiletries, clothing, travel clocks and luggage
- Theater or other amusements for personal or non-business use
- Traffic fines, parking fines, and court costs
- Transportation to and from home to regular or temporary place of work
- Travelers' check fees
- Unauthorized club or other membership dues, subscriptions or fees including airline club memberships
- Unauthorized first class travel upgrades or seat upgrades; flight or baggage insurance
- Unauthorized trips, entertainment, gifts, or donations
- Upgrade on rental cars without approval
- Any late fees that are incurred due to not paying an invoice, bill, fine, etc. on time. The expense will be refunded minus all late payment penalties.
- Any expenses that are deemed not to be reasonable and necessary expenses eligible under the provisions of this policy

Any exceptions to the above must be justified in writing and approved by the appropriate Business Unit EVP, prior to submission with the expense report.

PAYMENT METHODS

Corporate Charge Card

Company has a corporate charge card program with American Express for individually billed corporate cards. Cards are available to employees who travel for business at least once per year, or who will incur at least \$1,000 per year in local business entertainment or travel-related expenses. The American Express card is the preferred payment method for all business-related travel and entertainment expenses.

Additionally, when applying for the American Express Corporate Card, you are required to complete the Corporate Card Agreement, which must be approved by your manager. To apply for a Corporate American Express card, please e-mail your request to .

Note: Credit limit of card will vary depending on credit of individual. The Company does not check or determine credit worthiness for corporate card purposes.

Payment of Corporate Charge Card Invoices

The corporate card is to be used **only** for travel and entertainment purposes. Personal expenses should not be charged to the Corporate American Express Card. Employees are solely responsible for making payment of all charges shown on individual statements. All cardholders are expected to pay their corporate card invoices in full each month. Late or non-payment affects the Company's ability to obtain corporate card services. Late fees are not reimbursable.

Employees, who allow their corporate card balance to become delinquent risk suspension or cancellation of charge privileges.

Non-payment of the account is a violation of company policy and may subject the cardholder (employee) to disciplinary action, including termination of employment

Return and Cancellation

Employees who terminate employment are required to return their corporate card to management. The card will be cancelled. Employees who go on a leave of absence may be required to return their corporate card to their manager during the term of their absence.

Cash Advances

Airfare expense submitted for reimbursement prior to the date of the trip will be treated as a cash advance. After the trip has been completed, the traveler must submit a Travel and Expense request with receipts for expenses incurred during the trip; in order to clear the cash advance for airfare expense. Otherwise, cash advances are discouraged and require approval by senior management.

PREPARATION OF EXPENSE REPORTS

- All Travel and Expense requests must include a CLEAR AND COMPLETE statement of business travel, and must have the approval of the employee's manager.
- An expense report should be submitted immediately upon the completion of each trip.
- Only one trip should be expensed per Travel and Expense request.
- Expenses must be itemized on a daily basis.
- Miscellaneous expenses may be submitted together on one expense form.
- Name, title and company of individuals in attendance for business meals and/or entertainment should be detailed on the expense form. Documentation must include names and companies of attendees, business purpose and date of function.
- All deviations from standard policy must be explained. This includes employee paid airfare, hotel or rental car; car rental from vendor other than Avis and Budget; deviation from standard/mid-size car category, and use of valet parking for trips of 2 days or more.
- If business mileage is claimed using a Company issued vehicle, select the "Mileage (Company Car)" option in Ariba. If business mileage is claimed using a personal car, select the "Mileage (Personal Car)" option in Ariba. Your regular commute to and from the office is not reimbursable as business mileage.
- Expenses received in Accounts Payable more than 90 days after the date incurred will not be reimbursed, absent extraordinary circumstances and approval by the Chief Executive Officer.

Expense Reports not properly completed may be held or deductions may be taken pending information/receipts required for further processing.

Receipts - Required Documentation

- Receipts are required for all expenses in excess of \$25.
- The receipt must detail the expenditure showing date, amount, name and location of the establishment.
- When other employees are present at an event where expenses are incurred, the senior employee is responsible for payment and reporting of expenses.
- Credit card statements and copies of checks are not allowable forms of documentation.
- Receipted bills or invoice statements for all lodging are required, regardless of amount.
- A copy of the Travel Inc. issued e-Itinerary/Invoice including airline, hotel and car reservations must be included.
- All third party gifts for lodging expenditures, regardless of cost, require receipts.
- Original rental car expense receipts are required.

TRAVEL MANAGEMENT CONTACT NUMBERS

Employee Travelers

Travel Reservations

Monday–Friday; 8:00 a.m. to 6:00 p.m. EST

24 Hour Assistance

Local Atlanta: 770-291-4254 or 800-246-7129

After Hours: 800-246-7129

PER DIEM PAYMENTS

The preferred method for reimbursing employees for travel and entertainment expenses is the Company's existing Travel and Expense request procedure. Under this method, employees are reimbursed for actual expenses incurred, supported by receipts and appropriate documentation. This method also incorporates proper manager approval. However, under certain circumstances, Company employees may be paid a Per Diem allowance when traveling on Company business in lieu of submitting a Travel and Expense request.

It is the Policy of the Company to reimburse the traveler at the Standard Rate published by the United States General Services Administration (USGSA) for geographic destinations within the continental United States (CONUS). Company has chosen to use the High – Low Per Diem Rate (or Two Rate Method) for determining the appropriate rates to be used for Per Diem payments. Periodically, the Federal government issues high-cost localities that have higher travel costs than most areas within the United States. **Please refer to the USGSA Website for a list of the High Cost Localities:**

<http://www.gsa.gov/portal/category/26429>

Per Diem should never be paid in excess of the High-Low limits. However, it is acceptable to pay less than the limits. If a lesser amount is paid, the amount should be allocated at 60% for Lodging and 40% for Meals & Included Expenses.

When it is deemed appropriate for business reasons, to reimburse an employee using the Per Diem method, the Manager should first request approval from his/her Regional Manager or Business Unit Head to use the Per Diem reimbursement method. An example of an appropriate Per Diem situation would be in the case of a branch employee being "loaned" to another branch. If the employee is required to spend the night away from his/her residence for an extended period of time, the employee would be eligible for Per Diem. The Manager would process a Per Diem payment to the employee for the number of days the employee was away times the appropriate Per Diem rate. The Per Diem payment should be requested through Accounts Payable by having the employee complete the attached "***Request for Per Diem***" form and having his/her Manager sign the form. If the **Per Diem** is paid in advance, the employee would be required to return to the Company, any Per Diem paid to them for days not spent away from their residence.

Company

Request for Per Diem

Week Ending _____

Employee Name _____

Employee # _____

Travel Location _____

Branch # _____

Per Diem Rate \$ _____ /DAY Lodging (a)

Per Diem Rate \$ _____ /DAY M&IE (b)

Note: Please refer to the Company
Travel Policies and Procedures for Instructions
on Per Diem Rates and GSA
Information on High Cost Localities

High Cost Areas Per Diem Rate \$ _____ /DAY Lodging (a)

High Cost Areas Per Diem Rate \$ _____ /Day M&IE (b)

| | Date | Per Diem Due Yes / No |
|-------------------------|-------|--------------------------|
| Sunday | _____ | _____ |
| Monday | _____ | _____ |
| Tuesday | _____ | _____ |
| Wednesday | _____ | _____ |
| Thursday | _____ | _____ |
| Friday | _____ | _____ |
| Saturday | _____ | _____ |
| Total Per Diem Days Due | | _____ (c) |

Lodging Per Diem Amount \$ _____

(a) * (c)

Branch # to be Charged _____

M&IE Per Diem Amount \$ _____

(b) * (c)

Branch # to be Charged _____

Employee Signature _____

Date _____

Manager Approval _____

Date _____