



a Trading Division of Swedish Sea & Air Claims AB

TRAVEL & EXPENSE POLICY

Version 1.1 dated 01-01-2020

1. Purpose

The purpose of this policy is to:

- a. Describe the types of expenditures that are reimbursable by the company.
- b. Inform employees of their responsibilities to control and report travel and entertainment.
- c. Describe the process for an employee to file and obtain travel expenses and reimbursement.

2. Employee travel and expense guide

This guide is intended to aid the company's business traveller by setting forth guidelines and reporting requirements related to the company's expectations and regulations.

All travellers bear responsibility for cost-effective business travel.

While these guidelines are intended to be comprehensive, it is impossible to anticipate every situation encountered by a traveller. The traveller is expected to apply these guidelines on a conservative basis, consistent with normal living standards and, where the policy is silent, to exercise good business judgment.

3. General travel policy

It is the Company's policy to reimburse employees for all expenses necessary, reasonable and actually incurred when traveling on authorized company business.

Travel expenses must be properly documented and approved on a Travel expense report.

Employees are expected to:

- a. Exercise good judgment with respect to expenses.
- b. Spend the company's money as carefully and judiciously as they would their own.
- c. Obtain appropriate approvals from the company's clients when required.
- d. Report all expenses and advances promptly and accurately with required documentation.



4. Travel procedures

4.1 Air travel

All travel reservations should be made as far in advance as possible to take advantage of available discounted airfares.

For air travel of less than six hours, the employee should book the lowest available flexible economy fare.

For air travel of six hours or more, the employee may book the lowest available flexible premium economy fare or, if not available on the applicable route or if more economical than a premium economy fare, the employee may book the lowest available flexible business class fare.

Travel routing (point to point or multi sector fares) should be selected taking into consideration the billed hours anticipated for travel versus fare costs.

Business and First Class travel is not allowed unless it is at the employee's expense.

Employees who are enrolled in airline incentive programs are permitted to utilize their personal upgrades along with the company's booking of the lowest available fare.

Reasonable stopovers enroute may be approved provided that:

- a. They do not interfere or adversely affect achievement of the desired business objective.
- b. They do not result in any significant loss of work time.
- c. The travel expense claimed from the company does not exceed either the actual cost, or the cost of the applicable air fare between the place of departure and the business destination, whichever is the lesser.

If such a stopover is made, the company, assumes no responsibility or liability of any kind for any employee actions or activities during or occasioned by the stopover.

Airline tickets are considered legal tender and care should be taken not to lose or destroy them. Return any unused tickets or portions of tickets to the company.

Employees will be required to submit all company paid airfare receipts incurred while traveling. Used airline tickets should be attached to the expense report.

4.2 Rental car

All drivers must hold a valid driver's license or a car may not be rented.

Rental car is generally the most expensive mode of transportation and should only be used when the nature of the trip or the locations of the customer being visited is such that the use of local transportation including taxis is not practical or would be more expensive.

Choice of vehicle should be based on appropriateness with regards to country, journey length and number of occupants.

Rental cars should be returned to the original rental location where possible.

4.3 Personal car

A car personally owned by an employee and authorized for business use will be compensated when driven for such purpose and will be reimbursed a fixed amount of SEK 4.80 per kilometer. Mileage should be fully documented as to date, starting location, ending location, persons visited, business purpose, and the business kilometers.



4.4 Taxis

Taxis should be used when other reasonable and less expensive forms of transportation are not readily available. In traveling away from home, overnight living accommodations should to the extent practicable be selected so as to eliminate or minimize the need to use taxis or other local transportation. When taxis are used, they should be shared to the maximum extent possible by employees traveling together on company business. A receipt for the fare charged must be obtained by the taxi driver.

4.5 Hotels

The cost of hotel accommodation should be the most economical choice available taking into account reasonable quality, convenient location and the employee's safety. Upon arrival, the traveller should verify that the rate shown on the itinerary is the rate received.

4.6 Meals

The employee should normally select restaurants which are reasonably priced for the locality and which are consistent with normal living standards. Receipts must be attached for all meals purchased.

Business related meals for customers or with other employees must be described as follows: date, amount, place and explanation of nature of business. A list of names of those entertained must be included. A receipt is required for all entertainment expenses regardless of the amount. Business conferences over meals may be reimbursed with proper approval. Wine and bar tabs are reimbursable only if they are associated with a business meeting and are not excessive. Entertaining other employees, unless for stated business purpose, is not a reimbursable expense.

4.7 Business entertainment

Business entertainment means ordinary and usual business entertainment such as an occasional meal, ticket to a sporting event or theater, or comparable entertainment, so long as it is neither so frequent nor so extensive as to raise any question of propriety. The person providing the entertainment must accompany the recipient.

Business entertainment must have either directly preceded or followed a bona fide business discussion.

4.8 Miscellaneous

The company does not pay for *dry cleaning expenses* while on a trip of less than five (5) days duration. However, where circumstances require these services, the expenses will be reimbursed. Explanations should be documented on the expense report.

The payment of *tips and gratuities* should be limited to those situations and services where such payments are normal practice. The amount of percentage of any gratuity paid should not exceed that which is reasonable and customary for that category of personal service.

The following are not reimbursable:

- Annual credit card fees
- In-room or in-flight movies or entertainment
- Personal reading materials
- Airline, hotel, restaurant or car rental club memberships
- Expenses deemed to be wholly and exclusively for personal benefit

The company request that receipts (proof of payment) for all expenditures be submitted.

5. Expense report

Travelling personnel should maintain an adequate record for each trip and post all pertinent information in support of each expenditure (who, what, why, when and how much). Expense reports are due no later than thirty (30) days of first expenditure incurred.

Entertainment expenses incurred in the process of completing company business objectives should be supported by receipts for all expenditures and documentation detailing dates and places of entertainment,



names and number of people involved, business relationship of all involved, business purpose, and amount of each separate expenditure. All names should be listed including those of other company employees, unless it is a group clearly identified by title. The date, nature of the business, and participants in the related discussion preceding or following the entertainment must be shown.

Receipts are required for reimbursements of all authorized business expenses. The receipt must identify the name of establishment, date, actual amount incurred, description, and receipt of payment. Items considered non-receptacle such as housekeeping/porter tips and some highway tolls can be reimbursed without a receipt. Photocopies and missing receipts require exception approval.