



A V E N U
INSIGHTS & ANALYTICS

EMPLOYEE TRAVEL & EXPENSE POLICY

Revised December 1, 2018

Table of Contents

1. Introduction	4
1.1 Applicability	4
2. Policy Overview	4
3. Employee/Manager Responsibilities	5
3.1 Employee Responsibilities	5
3.2 Manager Responsibilities	5
4. Corporate Card	6
4.1 Eligibility for a Corporate Card	6
4.2 Use of the Corporate Card	6
4.3 Payment of the Corporate Card	6
5. Reporting of Expenses	7
5.1 Consequences of Failure to Report Expenses on a Timely Basis	7
5.2 Expense Report Approvals	7
5.3 Receipts Required	7
6. Travel Services	8
6.1 Companion Travel	8
6.2 Air Travel	8
6.2.1 Lowest Fare Requirements	8
6.2.2 Early Ticket Purchasing	8
6.2.3 Pre-Trip Notification/Approval	9
6.2.4 Unused Tickets	9
6.2.5 Lost Tickets	9
6.2.6 Airline Club/Lounge Memberships	9
6.2.7 Frequent Flyer Programs	9
7. Ground Transportation (auto, train, other)	9
7.1 Rental Car	9

7.2	Public Transportation.....	10
7.3	Taxi/Car Service.....	10
7.4	Rail/Trains	11
7.5	Personal Auto	11
7.6	Mileage Reimbursement.....	11
7.7	Insurance.....	11
7.8	Gasoline	11
7.9	Parking	12
7.10	Tolls, Ferry Charges, etc.	12
7.11	Lodging.....	12
7.12	Wireless Charges	12
8.	Meals.....	13
8.1	General Business Meals Guidelines.....	13
8.2	Employee Activities	13
8.2.1	Requirements	14
9.	Telephone.....	14
10.	Tips.....	14
11.	Memberships	15
12.	Laundry.....	15
14.	Expense Report Monitoring	15
15.	Exceptions	15

1. Introduction

This document (the Policy) describes the Avenu (or the Company) Travel and Expense (T&E) Policy and applies to all Avenu employees. It includes travel requirements for employees on business travel and reimbursement of business-related travel and entertainment expenses. The primary purpose of this Policy is to provide employees the information they need to:

- Properly manage business travel and safety
- Accurately report expenses
- Control costs

1.1 Applicability

This policy applies to the following categories of expenses:

- All business-related travel expenses such as airfare, hotel, meals, etc.
- Certain General/Entertainment Expenses:
 - Team Building/employee meals
 - Off-site meetings
 - One-time, infrequent gifts to employees (considered de-minimis >US\$10)

The policy does not apply to the following categories of expenses:

- Accounts Payable spend
- Invoice spend for general business expenses (Advertising, marketing, strategy, etc.)

2. Policy Overview

Avenu will reimburse reasonable and necessary travel and entertainment expenses incurred by employees in the conduct of Company business. Expense claims are submitted and paid via Concur (www.concursolutions.com). Expense reports are processed weekly and are paid via direct deposit 3 business days after processing.

In order to receive reimbursement, employees must show that their expenses were incurred for a legitimate Company business purpose and must provide all required documentation, including relevant receipts.

Avenu employees are required to comply with this Policy. If an employee violates this Policy, the Company may take one or more of the following actions:

- Delay or deny reimbursement
- Impose disciplinary action or terminate employment based on management discretion and applicable laws
- Facilitate taxation of reimbursements

3. Employee/Manager Responsibilities

3.1 Employee Responsibilities

Each employee is required to:

- Read, understand and comply with all aspects of this Policy
- Determine if there is a way to meet business objectives without traveling (Teleconferencing or videoconferencing may meet business needs and result in less cost and less time away from home and work)
- Proactively manage how the Company's funds are spent and provide details as to the business reasons for those expenses through the expense reporting process
- Ensure that all expenses incurred are in compliance with all policies and guidelines that govern appropriate business and ethical conduct
- Take proper precautions to ensure personal safety and to prevent theft or loss of Company property (e.g., cash, tickets, computers) by keeping valuable property close at hand or locked in a secure location
- Minimize expenses by selecting the lowest fares, taking advantage of advance booking fares wherever available, using company preferred suppliers and choosing the method of transportation that is most cost effective whenever possible
- Obtain all required approvals prior to travel or incurring costs
- Submit required expense reports and required receipts on a timely basis and ensure they accurately reflect actual costs incurred

3.2 Manager Responsibilities

Managers are required to:

- Ensure that employees understand the Company Travel Policy
- Monitor employee's travel expenditures to ensure they are reasonable and consistent with business requirements
- Review and approve (or reject) expense reports and/or other requests that require approval in a timely manner

- Fully cooperate in any investigation and work with human resources to determine and execute appropriate disciplinary action
- Review and approve (or reject) expense reports and/or other requests that require approval in a timely manner
- Fully cooperate in any investigation and work with human resources to determine and execute appropriate disciplinary action

4. Corporate Card

Employees are personally responsible for the safekeeping of their Corporate Card. The only person entitled to use the Corporate Card is the person whose name appears on the face of the card.

4.1 Eligibility for a Corporate Card

Employees are eligible for a Corporate Card if (1) their positions require travel and/or entertainment, (2) they have a documentable reason that they cannot use their personal credit card, (3) their immediate manager approves the issuance of a credit card and (4) as a condition of receipt of the Corporate Card, the employee agrees to permit the Company where permissible by law to either (a) deduct from earnings, via payroll deduction, or (b) deduct directly from the employee's bank account, via automatic withdrawal any erroneous or unauthorized expenses the employee bills to the Corporate Card.

4.2 Use of the Corporate Card

The Corporate Card is intended for business use only. Incidental personal expenses charged on the Corporate Card during Company business (e.g., movie rental on a hotel bill) must be designated in the traveler's expense report as personal charges and immediately reimbursed by the employee to the Corporate Card Issuer. Additional information about non-reimbursable expenses is listed in Appendix A.

4.3 Payment of the Corporate Card

The Corporate Card must be paid directly by the employee. Failure to pay any outstanding balance on the Corporate Card in a timely matter will result in unreimbursable fines and permanent closure of the account. Any amounts unpaid will be repaid by the employee by the methods outlined in Section 4.1.

5. Reporting of Expenses

All business travel expenses, regardless of type or amount, must be submitted as part of an expense report through the designated expense reporting process. Employees shall report all travel expenses within 15 calendar days of the date expenses are incurred.

5.1 Consequences of Failure to Report Expenses on a Timely Basis

Failure to submit expense reports on a timely basis may result in the suspension of the employee's Corporate Card or other disciplinary action, in addition to having the value of open items reported as income for tax purposes.

- Failure to submit reports within 60 days will result in suspension of the employee's Corporate Card and placement of a hold on all reimbursements due the employee. The Corporate Card will not be reactivated until the employee has submitted a report explaining the business purpose of the charges and paid any money owed to the Company.
- After three suspensions, additional disciplinary steps, as outlined in Section 2.0, will be taken.
- Cash expenses that are not filed within 120 days of when the expense was incurred may not be reimbursed.

5.2 Expense Report Approvals

Expense reports with exceptions to the rules and guidelines contained in this Policy and/or with expenses greater than certain threshold amounts will require approval by the CFO prior to processing.

5.3 Receipts Required

Receipts are required for all expenses greater than US\$25. In the event a receipt is lost, a credit card statement will suffice. However, repeated usage of credit card statements is not acceptable and may result in disciplinary procedures.

6. Travel Services

6.1 Companion Travel

“Business travel” includes spousal/companion travel only if authorized as part of a specific Company event by the CEO or CFO. Employees should not use company travel services for personal travel arrangements for themselves or others, or to provide information regarding personal travel plans, such as company negotiated rates or phone numbers for hotels.

In certain situations, Personal/vacation travel may be combined with business travel provided there is no additional cost incurred by the Company,

Avenu will not reimburse any vacation-related expenses such as sightseeing, bus tours, rental cars, ground transportation souvenirs and personal expenses.

Generally, where Business Travel and Personal/Vacation Travel is combined, the employee will be responsible for the difference between the business-related costs and the total cost of the trip. Individual exceptions to the above should be pre-approved by the CFO on a case-by-case basis.

6.2 Air Travel

6.2.1 Lowest Fare Requirements

Employees are expected to take the lowest fare offered when making flight reservations, unless there is a valid business reason to take an alternate flight (e.g., unavoidable schedule constraints). Exceptions will be flagged and require justification. In the event multiple carriers offer the same low fare, a preferred airline should be selected if it is one of the carriers offering the low fare.

6.2.2 Early Ticket Purchasing

Employees are expected to purchase tickets at least 14 days in advance whenever possible. Exceptions may be flagged and require justification.

While advance ticket purchasing may require tickets to be non-refundable, purchasing tickets in advance is encouraged for employees who frequent a particular destination and may be able to use the ticket on a future trip, in the event the current trip is cancelled.

6.2.3 Pre-Trip Notification/Approval

- Managers must be notified of all travel plans. It is the employee's responsibility to make sure his/her manager is aware of and approves of the employee's plans.
- All international travel requires pre-approval of the CEO or CFO

6.2.4 Unused Tickets

It is the employee's responsibility to make use of unused tickets for future travel prior to their expiration.

6.2.5 Lost Tickets

Employees should immediately notify the travel agency provider of any lost tickets. Airline lost ticket application fees are the responsibility of the employee.

6.2.6 Airline Club/Lounge Memberships

Avenu does not reimburse for airline club or lounge memberships.

6.2.7 Frequent Flyer Programs

Employees may participate in frequent flyer programs while traveling on Company business, provided there is no additional cost to the Company.

7. Ground Transportation (auto, train, other)

Employees should use the most cost-effective ground transportation option.

7.1 Rental Car

Avenu has negotiated discounted rates with both Enterprise and National rental car services. When renting vehicles for business travel, Avenu requires use of the company's these preferred rental partners Enterprise and National unless circumstances require the use of another provider. When booking travel, please reference our corporate account **XZ16AG3** in the account or promo code areas on the website. The corporate discount code may also be used for personal travel.

Employees should:

- Use the company preferred rental car vendor (National/Enterprise)
- Select an Economy/Midsize car, unless three or more employees are traveling together and renting a larger vehicle would avoid additional vehicle rentals
- Share rental vehicles whenever possible
- Ensure that vehicles are only driven by company employees
- Return rental cars on time to avoid late charges
- Decline the collision insurance offered
- Avoid costly surcharges by refueling rental vehicles before returning them. Gasoline refueling expenses for rental cars are reimbursable.
- Rental car agencies often charge costly surcharges for cars with onboard navigation systems. When making reservations, employees should generally request cars without these systems and use company smart phones for navigation technology. Renting of luxury cars and limousines are prohibited in most situations.

Please note that Avenu does maintain a corporate rental car insurance policy that covers damage to a vehicle rented during business travel. Should there be damage to another party's vehicle or other liability resulting from the incident, the employee's personal auto insurance will be the primary coverage. To the extent that any damage is incurred beyond the limits of the employee's personal insurance, the Avenu policy will cover the balance.

7.2 Public Transportation

Public transportation should be used when it is a reasonable, cost effective method of travel that does not present safety concerns for travelers.

7.3 Taxi/Car Service

Taxis or car services should be used where they are the most cost-effective ground transportation option, when public transportation is not a reasonable option, or to ensure traveler safety where alternative ground transportation methods are cause for concern.

7.4 Rail/Trains

Rail or train travel should be used whenever it is the most cost-effective option that meets business needs.

When traveling by rail, employees should pick a reasonable class of ticket that provides safe and adequate travel to the required destination. Business class is allowable if the fare is less expensive than traveling by air.

7.5 Personal Auto

Use of Personal Automobile is generally not recommended for business trips.

7.6 Mileage Reimbursement

Avenu will reimburse employees only for mileage that qualifies as business mileage under the U.S. Internal Revenue Code or applicable tax code. Mileage incurred on Company business will be reimbursed at the rate listed by the IRS for the relevant year. This reimbursement is intended to cover gasoline, operating expenses, repairs/ maintenance, depreciation and insurance. Commuting mileage between an employee's home and regular business location is not reimbursable

7.7 Insurance

Employees who use a personal vehicle on Company business are required to carry the minimum automobile liability (per person and per accident) insurance required by law.

Generally, employees should avoid use of personal cars while travelling for business purposes.

7.8 Gasoline

Gasoline purchased while using a rental car is reimbursable. Gasoline purchases for personal car use are not reimbursable because the cost of gasoline is covered in the reimbursement for mileage rate for business use of personal vehicles.

7.9 Parking

Necessary parking expenses incurred when traveling on Company business are reimbursable. Long-term parking is strongly encouraged for trips over 24 hours.

No reimbursement is permitted for parking at or near the employee's residence or other personal destination. Parking fines and traffic tickets are not reimbursable expenses.

7.10 Tolls, Ferry Charges, etc.

Bridge, tunnel and ferry tolls/fees incurred as part of valid business travel are reimbursable.

7.11 Lodging

- **Lower Rates** – It is always best practice to ask if there is a lower rate at the hotel at check in. Hotels run specials that may not be loaded in to travel reservation systems but can be secured simply by asking.
- **Cancellation of Reservations** – It is the employee's responsibility to be sure that guaranteed hotel reservations are cancelled if they will not be used. Itineraries should be checked for the required cancellation time.
- **Personal Charges** – Personal Expenses such as spa fees, in room services, mini bar or merchandise are not reimbursable.

Generally, employees should book hotels within a price US\$200 per night; however, a 20% increase is allowed in high cost cities (e.g., New York, Los Angeles, D.C., etc.). See Appendix B for a list of high cost cities. The above rate limits apply to the base rate only.

It is important to remember that these limits apply only to base rate and are maximum limits. Wherever applicable, employees should use discretion to use the most economic option, as needed.

7.12 Wireless Charges

Wireless Internet charges during travel on Avenu issued devices are considered business expenses and will be reimbursed.

8. Meals

8.1 General Business Meals Guidelines

This expense category should be used for reimbursement of expenses incurred for business meals in the company of suppliers, customers, or other employees.

There may be certain situations where exceptions to these guidelines are warranted; however, exceptions will be flagged and may require additional substantiation and/or manager approval.

The most senior employee is expected to expense the cost of any such meal.

The following information should be included on the back of receipts or on an additional sheet of paper for business meals with multiple attendees:

When reporting business meals, employees must submit actual expenses incurred along with the corresponding receipt. Reasonable meal expenses would be US\$75 per day per person (daily average).

A 20% increase will be allowed for high cost cities (see Appendix B for high cost cities)

There may be certain situations where exceptions to these guidelines are warranted; however, exceptions will be flagged and may require additional substantiation and/or manager approval.

Discretion is allowed for corporate events or meetings with clients, subject to manager approval.

8.2 Employee Activities

This category includes activities that focus on employees, not customers. Reimbursement is permitted for events that are intended to promote team morale and foster cohesion within a team. Reimbursable expenses include, but are not limited to, those related to holiday parties, annual picnics or team building events, including the cost to rent the facility, meals and entertainment.

8.2.1 Requirements

- Expenses for each event must be reasonable and pre-authorized by the CFO. A key factor in making this determination is how often such events are held and how many times any individual employee attends them.
 - Activities held at personal residences require prior written approval from the Department Executive
- A full attendee list, description of the event and receipts must be submitted for reimbursement
 - No company event may include “adult entertainment”

9. Telephone & Internet

Travel-related telephone charges not associated with Company approved cell phones may be expensed if the traveler does not have either of the above. Hotel phone charges must be itemized as part of the hotel folio.

Company approved cell phones may be issued for individuals who travel frequent or who work remotely with the approval of the CIO and/or CFO. Reimbursement for portions of an employee’s personal cell phone bill used for business purposes is subject to pre-authorization by the CFO.

No reimbursement will be made for home phones or home internet except where required by local law or jurisdiction, in which case it will be limited to \$25 per month in total.

10. Tips

Gratuities to waiters and taxi drivers should be included in the cost of meals and taxis and should not be separated as tips. Company practice is to tip 15%-20% for meals and service unless not customary to do so. In cases where receipts are required, tips should be noted on receipts.

11. Memberships

Initiation fees, assessments and dues for membership in professional, business related organizations should be settled via a Purchasing card or Accounts Payable wherever possible. These expenses will be reimbursed as a travel expense through the expense reporting system only when settlement via Accounts Payable is not possible.

12. Laundry

Reasonable laundry and dry-cleaning costs while traveling may be charged back to the Company if the trip is greater than five business days or if special circumstances occur. Manager approval is required for special circumstances. Employees should make all reasonable efforts to pack appropriately and avoid laundry charges during travel.

13. Non-Reimbursable Expenses

See Appendix A for a list of Non-Reimbursable Expenses.

14. Expense Report Monitoring

Expense reports will be audited for the following:

- Entry or accounting mistakes
- Compliance with this Policy
- Appropriate approval documentation as required by this Policy
- Adequate explanations for charges requiring descriptions
- Appropriateness of the expenditures to ensure that amounts are not excessive or improper
- Supporting documentation (receipts, attendee lists, etc.)

Discrepancies will be addressed directly with the employee and his or her direct manager.

15. Exceptions

All Policy exceptions can only be approved by the CEO or CFO.

Appendix A: Non-reimbursable Expenses

Non-reimbursable expenses generally include the following:

- Membership fees for airline, hotel, rental vehicle and frequent flyer clubs
- Tickets bought outside the Travel Policy
- Incremental costs of double-occupancy over single-occupancy rates for a spouse/guest unless in connection with a Company event where Avenu has agreed to pay guest-related travel expenses
- Hotel charges associated with cancellation, where reasonably prudent actions were not taken to avoid such charges
- Flight and other travel insurance (the Company provides insurance for employees)
- Parking tickets/traffic violations
- Personal credit card fees
- Personal entertainment or recreation items (e.g., magazines, books, movies)
- Personal expenses incurred in employee's absence (e.g., lawn care, snow removal)
- Membership in health clubs and associated fees (except for fees charged by hotels for use of fitness center by hotel guests)
- Lost airline ticket application fees
- In-room movies during hotel stays or charges for in-flight movies on airlines
- Charges for barbershops, beauty salons, massages, shoeshine or similar items
- Purchase of clothing, toiletries or medicines
- Adult entertainment
- Charities and contributions to political organizations
- Pet Boarding Fees

Appendix B: High-Cost Cities

North America	
<p><u>California</u> San Francisco San Mateo/Foster City/Belmont Santa Barbara Santa Monica Sunnyvale/Palo Alto/San Jose Los Angeles</p> <p><u>Colorado</u> Denver/Aurora Grand Lake</p> <p><u>District of Columbia</u> Washington, DC metro area</p> <p><u>Florida</u> Fort Lauderdale Fort Walton Beach Key West Miami Naples</p>	<p><u>Illinois</u> Chicago</p> <p><u>Massachusetts</u> Boston/Cambridge</p> <p><u>New York</u> Lake Placid New York City</p> <p><u>Pennsylvania</u> Hershey Philadelphia</p> <p><u>Virginia</u> Washington, DC metro area</p> <p><u>Washington</u> Seattle</p> <p><u>Puerto Rico & the Caribbean</u></p> <p><u>Canada</u> Toronto Vancouver</p>