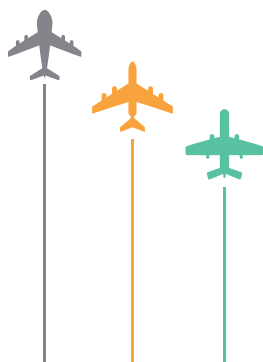




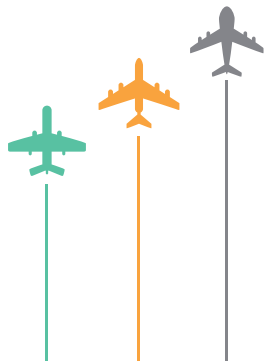
# WFS Global Travel Policy & Guidelines



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## **1. TRAVEL POLICY PURPOSE AND ENFORCEMENT**

### **1.1. PURPOSE**

This document provides guidelines and establishes procedures for employees incurring business travel and related expenses on the company's behalf.

Objectives are:

- To ensure all employees have a clear and consistent understanding of WFS policies and procedures for business travel,
- To provide business travelers with a reasonable level of service and comfort at the lowest possible cost,
- To maximize the company's ability to negotiate discounted rates with preferred suppliers and to reduce travel expenses.

### **1.2. SCOPE**

This Travel Policy applies to all WFS legal entities (subsidiaries, branches, representative offices, joint-ventures, partnerships, etc.) and any other entities in which WFS is a shareholder. In instances where WFS owns a minority of the entity shares or does not exercise effective control, such entity(ies) shall adopt this or a materially similar Policy.

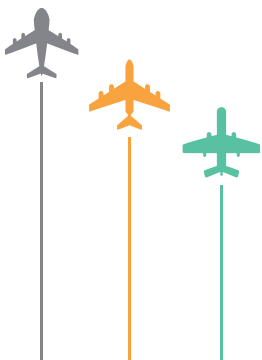
Specific business units or entities may, at their own discretion, impose greater control than required by this Policy, but never less. Local laws shall always supersede this Travel Policy and such requirements should be verified by the Legal Department and the Human Resources Function.

### **1.3. RESPONSIBILITY AND ENFORCEMENT**

This Policy applies to and must be complied with by all individuals working at all levels and grades for WFS, including Executives, senior managers, directors and employees (whether permanent, fixed-term or temporary) wherever located; collectively and individually referred to here-in as "Employees".

- Non-compliance with this Policy may be grounds for discipline, up to and including termination of employment.
- The company will reimburse employees for all reasonable and necessary expenses incurred in compliance with this Policy while traveling on authorized company business.

Any exception to this Policy, will need to be evaluated on a case by case basis, and escalated to the hierarchical Executive Committee member for approval. Such approval would need to be documented and included in the employee expense report.



#### 1.4. TRAVEL AGENCY SERVICES

WFS has appointed Travel Agency Services Suppliers globally, and all business travels must be booked through them. These agencies have access to all Procurement Agreements negotiated on behalf of WFS.

Travelers must not book independently or via any other means.

To comply with WFS's Duty of Care obligation as an employer, and to ensure WFS's ability to track its travelers at all times, it is mandatory that all bookings be made only via the authorized Travel Agency suppliers.

Refer to the WFS Sourcing department or your local HR, for further guidance on business travel bookings, the list of authorized travel agencies and on-line booking tools, and authorized approvers at your WFS location.

#### 1.5. BUSINESS TRAVEL BOOKINGS & AUTHORIZATIONS

Prior to any business travel, employees must obtain authorization of his/her approver (by e-mail, or via the on-line booking tool - wherever this option exists for use), for:

- Domestic and International Air Travel,
- Domestic and International Rail Travel,
- Short term Car Rental,
- Hotel booking.

#### 1.6. LOYALTY / FREQUENT USER PROGRAMS

Membership of loyalty / frequent user travel programs can assist business travel through preferential service, potential upgrades and use of lounges. Travelers may retain the benefits of such schemes for their private use. Any ensuing tax liability will be the individual's responsibility and not the Company's. All travel decisions that are taken on the sole basis of benefits accruing from such loyalty scheme are prohibited.

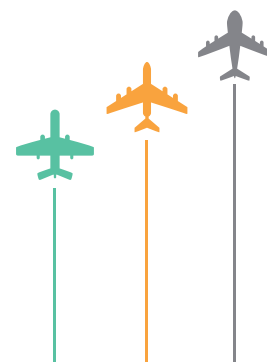
#### 1.7. CHANGING TICKETS / VOLUNTARY DOWNGRADES

The changing of tickets provided by WFS into cash or lower-class tickets for personal gain is not permitted. Travelers may not volunteer to be off-loaded from overbooked services. Travelers are also not permitted to voluntarily down grade to a lower class to enable to take their partner/spouse at the company's expense. This practice will constitute a potential "Benefit in Kind" tax liability.

#### 1.8. BUDGETARY CONTROL & COST-EFFECTIVE TRAVEL

The traveler and its appropriate/authorized approver share the responsibility to ensure that all travels are undertaken in the most cost-effective way:

- Consider the appropriate travel options according to business needs.
- Procurement Preferred Travel Agreements should always be used to allow cost control.
- Travel agencies may offer booking and information services after official business hours. This service has a cost and it should only be used by exception for emergency cases.



## 1.9. TRAVELERS TRAVELLING TOGETHER

For travelers travelling together, the following restrictions apply:

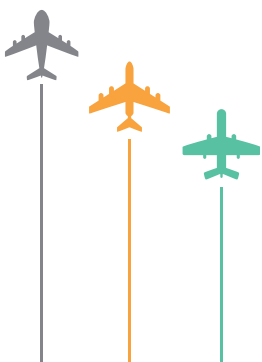
- The CEO and CFO should not travel on the same means of transport (airplane, train, car, etc.). However, whilst every effort will be made to avoid this from taking place, there may be occasions where due to business necessity, it is unavoidable,
- No more than four (4) Executive Committee members should travel on the same means of transport,
- No more than half of the members of any business function should travel on the same means of transport,
- Responsible leaders of large business events / conferences shall ensure that the majority of their team members do not travel together on the same means of transport.

This restriction shall not apply for emergency evacuation when necessitated due to pandemic or natural disaster, if directed / enforced by the WFS Crisis Management Team.

## 1.10. GENERAL TRAVEL SAFETY & SECURITY TIPS

Before you leave:

- Be familiar with your destination,
  - Periodically due to various situations, restrictions on travel may be advised for safety and security reasons. Prior to any travel, employees should check their government's travel advice website and avoid business travel to any country or city there-in listed.
    - o Any exception requires approval by your Line Manager + the Global Head of Safety and Security.
  - Ensure you take all medical precautions according to your personal health condition, and follow travel recommendations by international organizations such as the World Health Organization ([www.who.int](http://www.who.int)):
    - o Immunizations requirements, disease information and general precautions per destination country and mode of travel: Medical consultations, medical kits, or other such as the use of compression stockings for long distance travel, etc.
  - Refer to chapter 5 for reimbursement of related expenses.
  - Train & Air travel
    - o Be prepared for extra security checkpoints and follow local government regulations.
    - o Be alert and aware at all times.
  - At destination
    - o Carry your photo identification and name of a person to contact with you in the event of serious illness or any other emergency
    - o Preparing your travel and common sense can go a long way toward preventing loss or damage while traveling or staying in a hotel. Alertness, vigilance and time (origin to destination) by more than 2 hours and there is no disruption to traveler's business activities. Caution can be among the more effective preventive actions that a business traveler can take.



## **Blacklisted Airlines**

- The usage of sanctioned Airlines for safety reasons, “Blacklisted” by the European Union or the FAA, is strictly restricted. To identify the list of Blacklisted airlines by the European Union, refer to:
- [https://ec.europa.eu/transport/modes/air/safety/air-ban/search\\_en](https://ec.europa.eu/transport/modes/air/safety/air-ban/search_en)
- In the event that the “blacklisted carrier” has a route monopoly and therefore must be used, exceptional approval by your Line Manager + the Global Head of Safety and Security is required.

### **1.11. SOCIAL NETWORK**

For confidentiality, image and security reasons, WFS strictly prohibits employees from sharing widely on social network sites (Facebook, Instagram, LinkedIn, etc.) professional travel itineraries.

- Employees may only share route and itinerary information to personal / family contacts for convenience and security.

Refer to the Corporate Communications department for external communications guidance when assisting to WFS or customer events.

Avoid posting «reviews» or negative comments about WFS’s preferred suppliers on social network sites such as Facebook, Twitter or Trip Advisor. Please contact WFS Central Procurement Team to report any negative experiences with WFS Preferred Providers.

## **2. TRAVEL POLICY GUIDELINES**

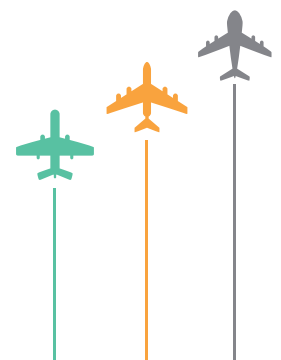
### **2.1. AIR TRAVEL**

#### **2.1.1. Eligible classes of travel**

- First class is never permitted.
- All other travels:
  - **0-4 hours** “Direct Flying Time”: Economy Class must always be used at the lowest logical airfare available,
  - **4 + hours** “Direct Flying Time”: Business Class may be used for all employees.

**Note:** “Direct Flying Time” is defined as the scheduled time on board, without time on ground for stop-over connection flights.

**Note:** “Lowest Logical Air fare / Rate” is defined as the lowest preferred supplier fare for a particular route or destination. On top routing requires no more than one additional interim stop each way and does not increase the one-way total elapsed time (origin to destination) by more than 2 hours and there is no disruption to traveler’s business activities.



- Upgrades for Air travel: upgrades at the expenses of the company are not permitted. Upgrades earned on frequent flyer programs may be used. Upgrades are allowed at the traveler's expense.
- Discounted Airfares: the following types of low fare alternatives will be considered in determining the lowest logical airfare:
  - Non-refundable fares,
  - Penalty fares,
  - Advanced purchase fares,
  - Connecting and one-stop flights,
  - Off-peak flights.
- Travelers are not allowed to book private or charter aircraft.
  - Exception: this shall not apply for emergency evacuation when necessitated due to pandemic or natural disaster, if directed / enforced by the WFS Crisis Management Team.

### 2.1.2. Low cost carriers

The usage of Low-cost Carriers is strongly encouraged to produce savings. The WFS on-line travel self-booking tool (where available) or the authorized travel agency must always be used for all Low-cost Carrier bookings as this is required to ensure safe travel compliance and global traveler tracking.

### 2.1.3. Non-preferred Carriers

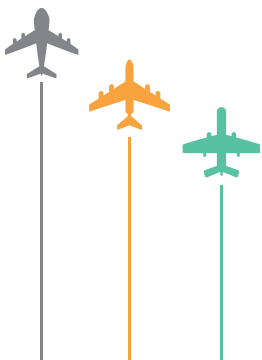
Non-preferred carriers may only be used where no other local service is provided, or when total savings (taking in consideration baggage, credit card fees and ground transportation costs) are more than €100 (or equivalent in local currency) for continental travel, or €500 (or equivalent in local currency) for intercontinental travel.

### 2.1.4. Loss of Baggage

The ultimate responsibility for retrieving and compensating for lost baggage lies with the airlines. In the case of loss of baggage, the rules of the Montreal Convention shall apply, to which all airlines are subject to, for the exception of non-IATA carriers. Refer to the airline recovery procedure when baggage lost in route. In any case:

- Always carry valuables (e.g. jewelry, laptop computers, cameras, etc.) on board the aircraft: consider traveling cheap, keep non-necessary valuables home.
- Always carry important and/or confidential documents on board the aircraft.
- Clearly tag luggage with name, address and phone number.
- Retain baggage claim receipts for checked baggage.

WFS travel insurance (chapter 6 of this document) can offer support on compensation for lost luggage if necessary.





### 2.1.5. Denied boarding compensation

Airlines occasionally offer free tickets or cash allowance to compensate travelers for delays and inconveniences due to over booking, flight cancellations, changes of equipment etc. Travelers must not volunteer for denied boarding compensation when on company business.

Travelers who are involuntarily denied boarding should immediately obtain free vouchers from the airline and may keep the free voucher for personal use.

### 2.1.6. Overnight delays

Should an airline delay necessitate an overnight stay, the traveler must first attempt to secure complimentary lodging from the airline. The travelers may contact the helpdesk of the Travel Agent or use the Self booking Tool to book hotel.

### 2.1.7. Cancellations / Used – Voided airlines tickets

When a trip is cancelled after the ticket has been issued, the traveler must notify the Travel Agent (during business hours) or the helpdesk of the Travel Agent as soon as possible.

Unused airline tickets must be provided to the Travel Agent to obtain refund.

## 2.2. RAIL TRAVEL

### 2.2.1. Eligible classes of travel

- Domestic routes:
  - **0-4 hours** "Direct travel time" – 2nd Class must always be used at the lowest logical fare available,
  - **4+ hours** "Direct travel time" – 1st Class may be used.
- International routes:
  - For all international routes, 1st class may be used.

## 2.3. HOTELS / ACCOMMODATIONS SELECTION

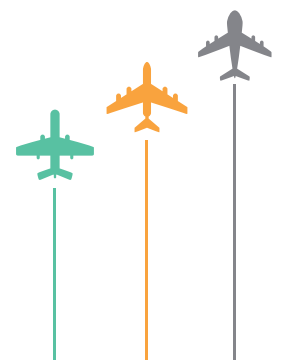
### 2.3.1. Making Hotel reservations

Travelers are required to book accommodations that offer economy or moderate rates (preferring WFS negotiated corporate rates), based on availability. Nightly rate limits will be higher in larger metropolitan cities than in smaller rural areas.

Travelers may accept room upgrades to suites or executive floor rooms only if the upgrade incurs no additional cost to the company.

### 2.3.2. Long term hotel stays

Travelers staying a week or longer or who are involved on ongoing projects should have the Travel Coordinator or Travel Agent inquire about weekly/long term discount.



### 2.3.3. Hotel room guarantee

Hotel room bookings shall be guaranteed with the traveler's corporate credit card. Travelers without corporate credit card shall guarantee hotel room bookings using their personal credit card.

- In the event of an overnight flight, the traveler shall be permitted to book the previous night in the event such a flight arrives prior to 10am local time.

### 2.3.4. Hotel cancellation procedure

Travelers are responsible for cancelling hotel rooms:

- Travelers will be held responsible and will not be reimbursed for "no show" charges unless there is sufficient proof that the billing is in error, or that travel has been cancelled after hotel deadlines due to business or other external reasons to the traveler.
- Travelers booking via Self Booking Tool or the Authorized Travel Agency, should request and record the cancellation number in case billing dispute.

### 2.3.5. Mini-bar expenses

Mini-bar expenses (except water) are not reimbursed by the company.

## 2.4. FERRIES / EUROTUNNEL / SEA TRAVEL

Overnight cabins are booked in Business class. If you are taking your company car abroad, it is important that you notify your Car fleet Administrator.

## 2.5. ROAD TRAVEL

Rental cars should be used when suitable, cost effective, public transport or company-owned are not available. The rental should be arranged wherever possible prior to your journey through the Self Booking Tool or via the Travel agency. Drivers must ensure they have an appropriate license for the country visited and are familiar with local traffic regulations.

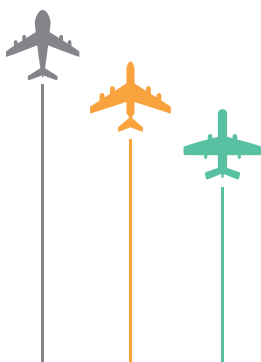
Travelers are always required to request low emission vehicles.

All rental cars should be refueled before they are returned to avoid unnecessary costs. Every reasonable effort must be made to return the rental car to the original rental city, unless approved for a one-way rental, intact (i.e. no bumps, scratches or mechanical failures), on time to avoid additional hourly charges.

Any damage incurred to a rental car must be immediately reported and the car must only be returned to the rental car location advised by the supplier for repair.

### 2.5.1. Rental cars

- WFS has selected regional suppliers. The least expensive of these ones will be booked with the following guideline: compact is the company standard (Groups B & C) unless in a group of 3 or more when an intermediate size can be rented.'
- In the event the local office has fleet cars available for the travelers, such may be used instead of rental cars.



### 2.5.2. Rental car insurance – Domestic

- The traveler should ensure that rental cars obtain 100% insurance policies against damage and third-party liability.
- Rental car insurance is included in the company negotiated rates.
- Therefore, travelers must decline all insurance coverage except:
  - Coverage for additional drivers (when applicable),
  - Coverage for drivers under 25 years of age, unless local laws permit the drivers to be below the age of 25 years old,
  - At licensee locations domestically or when booking overseas

### 2.5.3. Rental car insurance – International

- Traveler should accept 100% insurance coverage when renting cars in a foreign country against damage and third-party liability.
- Insurance coverage purchased in foreign countries is reimbursable.

### 2.5.4. Rental car cancellation procedures

- Travelers are responsible for canceling rental car reservations with the designated Travel Agency or through the Self Booking Tool as soon as possible.
- Travelers via Self Booking Tool or Travel Coordinator should request and record the cancellation number in case of billing dispute.

### 2.5.5. Employee's own cars

Employees may use their personal car for business purposes at the traveler's discretion. Frequent use of personal vehicles for business is not encouraged.

- It is the personal responsibility of the owner of a vehicle being used for business to carry adequate insurance coverage for their protection and for the protection of any passengers.
- Travelers will be reimbursed for business usage of personal car based on local laws, including the refund of gas utilization.
- Employees will not be reimbursed for any repairs to their personal car even if these costs result from business travel.
- To be reimbursed for the use of their personal car for business, travelers must provide on their expense report:
  - The purpose of the trip,
  - The date and location,
  - A mileage log.

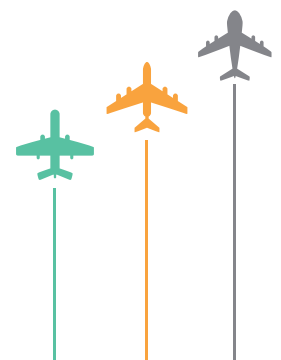
## 2.6. PARKING CHARGES ROAD TOLLS & SPEEDING FINES

Parking charges and road tolls may be-claimed if incurred on company business. WFS will not reimburse speeding or any other fines.

## 2.7. GROUND TRANSPORTATION

Taxis, ride-hailing services (Uber, Lyft, etc.), hotel shuttles, airport transfers and pre-arranged vehicles should be used for safety and security. WFS suggest car and taxi sharing with other WFS employees, in particular for transport between airports, hotels and offices.

The usage of hybrid and/or low carbon emissions vehicles is preferred, wherever these vehicles are available for use. The booking agency will monitor and report on usage and exceptions.



## 2.8. MEALS (PERSONAL & BUSINESS)

### 2.8.1. Personal meal expenses

Personal meals are defined as meal expenses incurred by the traveler when dining alone on an out-of-town business trip.

Travelers will be reimbursed for personal meal expenses according to actual and reasonable cost and subject to the traveler's immediate manager's approval.

### 2.8.2. Business meals taken with other employees

Employees will be reimbursed for business related meals taken with other employees only in the following circumstances:

- When a client is present,
- When at least one company employee is from out of town,
- When, for confidentiality reasons, business must be conducted off company premises

Meal costs or entertainment for social occasions, such as employee birthdays, are not classified as business meals and require special approval from your general manager or department executive.

### 2.8.3. Tipping for meals:

Tips included on meal receipts will be reimbursed, for the exception of jurisdictions where tipping is included in meal costs (i.e. France, etc.) as a general rule, employees should tip between 15-20%. Any tips over 20% will not be reimbursed.

## 2.9. PERSONAL / VACATION TRAVEL

Personal/vacation travel may be combined with business travel:

- Provided there is no additional cost for the company,
- With approval from your line manager.

Company negotiated hotel and car rental rates may be used for personal/vacation at the traveler's expense, however contracted car insurance coverage does not apply.

## 2.10. TELEPHONE USAGE

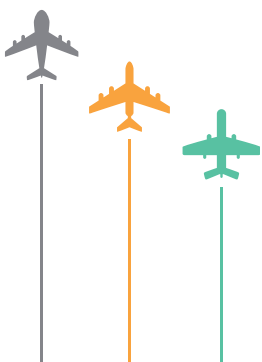
Travelers will be permitted to expense data consumption on board of flights to permit the employee to conduct work related matters.

Travelers will be reimbursed for business call made on cellular phones that are reasonable and necessary for conducting business, in the event WFS does not provide a company phone. A copy of the bill must be attached to the expense report form.

## 3. MEETINGS & ENTERTAINMENT

### 3.1. MEALS AND ENTERTAINMENT OFFERED TO THIRD PARTIES

WFS acknowledges that providing hospitality is a common business practice intended to develop and strengthen business relationships.



However, we must ensure that we act appropriately at all times and that we do not give the appearance that business decisions have been influenced or an improper advantage gained as a result of such practice. For that matter:

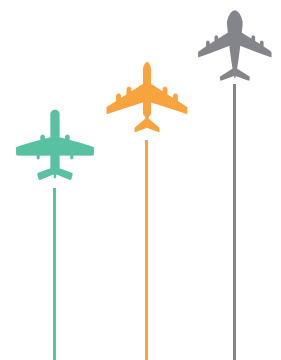
- Prior to offering any meal, gift or entertainment to customers, prospects, associates, or any other WFS third party (vendor, supplier, JV partner, etc.), make sure such offer is in compliance with the WFS Gifts & Entertainment Policy, and obtain appropriate pre-approval when required.
- When more than one employee is present at a business meal, the most senior level employee should pay the bill.
- The following information is required and must be consistently recorded on the expense report:
  - The names of individuals present, their titles and company name,
  - The name and location of where the meal or event took place,
  - The exact amount spent per person and day of the expense.

For further guidance on the requirements that must be met when offering hospitality to third parties (business meals, gifts, entertainments, or other), refer to the WFS Gifts & Entertainment Policy.

### 3.2. MEETINGS & CONFERENCES

Whilst it is recognized that it is important that we interact effectively and regularly with each other, we have the responsibility to consider alternative forms of communication to physical meetings and travel. When the latter is necessary, the following set of guidelines apply:

- Wherever and whenever possible, all meetings and conferences should be held in WFS facilities,
- Wherever possible, invitations should be limited to one team member representing a specific team/subject/project,
- External venues should be located near to main airport hubs,
- Meetings should be held in the lowest cost location (where most participants are based)
- The objectives of the meeting (e.g. information sharing, communication, consultation, decision making, etc.), agenda and a list of invitees should be communicated in advance,
- Where / whenever possible, meetings should be arranged in such a way that minimizes the requirement for any overnight accommodation, Consideration should always be given to the impact the scheduling of a meeting will have on the participants and their work-life balance,
- Individual employees are responsible to book all travel based on the cheapest options available with WFS preferred suppliers,
- Exception may be granted by the employee's line manager, when attending industry events and conferences where specific hotels have been designated.
- Meetings should be planned in advance to identify the lowest cost travel options available,
- Wherever possible, meetings should not be changed once they have been confirmed to avoid the potential risk of significant and unnecessary cancellation penalties,
- Where external venues are being considered, they should be professionally sourced and managed. Preferred meeting & event venue suppliers "must" always be used to ensure leverage benefits are maximized and to comply with WFS safe travel requirements for global traveler tracking.



## 4. CORPORATE CREDIT CARDS

- Manager-level employees who incur frequent business expenses in performance of their job duties (at least 10 times per year or incur 1000€ yearly in business expenses, or the equivalent in local currency), may apply for a Corporate Credit Card which would be provided only if approved by its entity's management:
  - The corporate credit card is a personal liability of the employee and must be used in compliance with this global travel policy.
  - The corporate credit card is to be used for bona-fide business expenses only, personal charges **ARE PROHIBITED**.
  - Employees with a corporate credit card must use it to pay for all related travel expenses, which may include, but are not limited to: ground transportation (taxi, car rental, etc.), meals, gasoline, tolls, etc.
- Accounting department will not reimburse travel expenses in a legitimate case where the employee could have used the corporate credit card but chose not to do so. The company will take appropriate disciplinary action for misuse of the corporate credit card.
- Any interest or fees accrued for failure to pay on time will be the sole responsibility of the employee.
- Lost or stolen cards must be reported immediately to the banking institution. The employee must also report the lost or stolen credit card to WFS's corporate Finance department within 48 hours.
- The employee must return the credit card to his supervisor upon termination of employment with WFS or when the card is deemed no longer necessary. The supervisor/manager will notify the company's Finance department and the card will be cancelled.

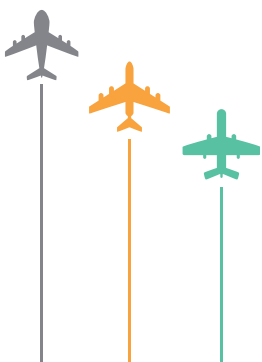
## 5. EXPENSE REPORTS

### 5.1. TIMING FOR EXPENSES REPORT COMPLETION AND SUBMISSION:

- Travelers must file the approved travel expense report within thirty (30) days.

### 5.2. REIMBURSEMENT PROCESS:

- All expense reports must be reviewed and approved by the employee's line manager, general manager or department executive.
- The accounting department will review each employee expense report form:
  - Approval signatures,
  - Business purpose,
  - List of invitees,
  - Correct amounts,
  - Supporting documentation, receipts, etc.
  - Policy compliance.



- When a receipt is not available, a full explanation of the expense and the reason for the missing receipt is required.
  - Actual bills/receipts must be submitted whenever possible. Photocopies will be acceptable only with a detailed explanation of why the original is unavailable.
  - Receipts must include the name of the vendor/client, location, date and amount in local currency of the expense.
- Converting foreign currencies for expense report purposes:
  - Cash expenses in foreign currencies should be converted to local currency of traveler using the XE universal converter (at the exchange rate of the payment day).
  - Credit/Debit card payments in foreign currencies: conversion rate considered is the one applied by the financial institution. Bank statement evidence shall be provided.

### 5.3. REIMBURSEMENT OF EXPENSES:

- Reimbursement for approved expenses will be sent to the employee within 30 working days after validation of the expense report.
- Expense reports that are incorrect or incomplete will be returned to the approver for corrective action and will result in delay or non-reimbursement of specific items.

### 5.4. OTHER EXPENSES:

- Laundry expenses are allowable when the trip is over five working days. Receipts must be included in the expense report.
- Expenses of personal nature ARE NOT reimbursable, i.e. movies, toiletries, magazines, special room services, tips (other than meal tips), child care, boarding costs for pets, traffic fines or parking tickets, personal credit card fees, briefcases, luggage, personal services, health clubs or spas, clothing, bars, hats, shirts, sightseeing, souvenirs, etc.

## 6.INSURANCE

Travel insurance coverage:

- WFS's employees are covered by the WFS travel insurance policy.
- Coverage includes among other:
  - Medical assistance, expense coverage and compensation
  - Assistance and compensation for lost property and delayed/cancelled trips
  - General liability insurance
- Expenses for additional travel insurance coverage will not be reimbursed by WFS.
- In case of emergency (Medical Assistance, Security Assistance or Emergency Assistance), refer to:

**Name of the Insurance Company: Chubb European Group Ltd**  
**N° Policy and validity date: UKBBBD0456 – From 30/04/2018 to 29/04/2019**  
**N° Tel: +44 (0)20 7173 7796**

