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TRAVEL AND EXPENSE POLICY
NBCUniversal

I. BUSINESS TRAVEL & ENTERTAINMENT POLICY.....	3
1.1 DETAILS.....	3
1.2 RESPONSIBILITIES	3
1.3 REIMBURSEMENT OF EXPENSES.....	4
1.4 RECEIPTS	4
1.5 DIRECT BILLINGS.....	5
1.6 REVIEW AND APPROVAL	5
II. CITIBANK VISA CORPORATE CARD.....	6
2.1 CHIP and PIN	6
2.2 FRAUD IDENTIFIED BY CITIBANK	6
2.3 TRANSACTIONS IN DISPUTE	6
2.4 PERSONAL CHARGES.....	6
III. TRAVEL PROCEDURES AND RELATED EXPENSES	6
3.1 TRAVEL SERVICES.....	6
3.2 TRAVELER PROFILE	6
3.3 TRAVEL INSURANCE	6
3.4 TAXICAB/CAR SERVICE/UBER/LYFT.....	9
3.5 TRAVEL TO/FROM AIRPORTS	9
3.6 AIR TRAVEL.....	9
3.7 AUTOMOBILE TRAVEL	10
IV. ACCOMMODATIONS AND MEALS 4.1 LODGING AND ACCOMMODATIONS.....	13
4.2 MEALS.....	14
V. ENTERTAINMENT	14
VI. REIMBURSABLE EXPENSES	15
6.1 PERSONAL PROPERTY LOSS/DAMAGE.....	15
6.2 LAUNDRY AND VALET	15
6.4 TIPS	16
6.3 OFFICE SUPPLIES	16
6.5 GYM COSTS.....	16
6.6 INTERNET SERVICES.....	16
6.7 Gifts	
6.7 a NONREIMBURSABLE ITEMS.....	16
6.8 ITEMS TO BE PAID THROUGH ACCOUNTS PAYABLE.....	17
6.9 MEDICAL EXPENSES.....	17
VII. NON-REIMBURSABLE EXPENSES	18
7.1 ADULT ENTERTAINMENT.....	18
7.2 PERSONAL EXPENSES.....	18
7.3 ACCOUNTS PAYABLE ITEMS	19
7.4 MEDICAL EXPENSES.....	19

I. BUSINESS TRAVEL & ENTERTAINMENT POLICY

NBCUniversal's Travel and Entertainment Policy defines the criteria governing the reimbursement of authorized expenses incurred by employees traveling and/or entertaining on behalf of NBCUniversal and its designated subsidiaries and affiliates.

This Policy provides guidance to employees, administrators, and expense report approvers regarding Company policies that pertain to business travel and entertainment expenses.

This Policy outlines the procedures for obtaining transportation, lodging and ground transportation, defines reimbursable vs. non-reimbursable expenses; and outlines the documentation required to prepare the NBCUniversal Travel & Entertainment Expense Report in order to obtain reimbursement for qualified expenses and comply with IRS standards.

1.1 Details

NBCUniversal's Business Travel and Entertainment Policy applies to all employees and contractors engaged in business activities on behalf of the Company Preferred vendors, such as Citibank VISA, Concur (Travel and Expense) and BCD (the Travel Agency) must be used when possible. The procedures detailed in this Policy are intended to establish standards for the consistent treatment of all employees who incur business travel and entertainment expenses.

For security purposes, all air and hotel travel arrangements must be made using the Company designated Travel Agency where such requirements exist. All travel and entertainment expenses must be charged to the Citibank Visa Corporate Card when employees have been designated as eligible for the Corporate Card Program (see criteria set forth below).

1.2 Responsibilities

Business Leaders and Business CFO's: Business leaders and CFO's are responsible for the proper day-to-day administration and enforcement of this Policy.

Managers: Managers are required to review and approve all their employee's expense reports. It is imperative that the Manager is familiar with the Policy and all required documentation for expenses. A Manager's approval of an expense report certifies to the Company the following:

- All receipts have been reviewed and are complete, reasonable and attached to the expense report.
- All submitted expenses are compliant with this Policy.

- All submitted expenses are fully documented and the documentation is attached to the expense report.

It is the sole responsibility of the Manager to promptly review and approve or question and reject any submitted expense that is not in accordance with this Policy within 30 days of receiving the expense report. Failure on behalf of the Manager to accurately review expense reports may result in disciplinary action, including termination of employment.

Employees: All employees shall conduct Company business with integrity and good judgment and shall exclude considerations of personal advantage when traveling or entertaining on behalf of the Company. Expenses shall always be reasonable and kept to the minimum amount necessary to perform authorized Company business. Employees are expected to comply with this Policy and report all expenses promptly and accurately with the required documentation.

Employees are responsible for keeping their T&E expenses up to date. Any Citibank Visa charges that are aged greater than 60 days and not submitted in an expense report will cause the Citibank Visa card to be suspended. Cash advances that are not settled through an expense report will also suspend the Citibank Visa card. Employees who have corporate cards suspended three times within a rolling 12-month period are in jeopardy of losing their corporate card privileges. If Employees do not return funds to the company for personal charges within 60 days, it will cause their card to be suspended.

1.2a Missing Receipt Affidavit

- When a valid receipt cannot be obtained from the merchant, the Missing Receipt Affidavit must be accepted by the employee and will be electronically attached to the expense report. This form cannot be used for Hotel and Car rental expenses. An expense delegate can complete the expense report; however, any Missing Receipt Affidavits will need to be acknowledged and submitted by the employee.

1.3 Reimbursement of Expenses

The Company shall reimburse employees for reasonable and actual expenses incurred while engaged in authorized Company business. All T&E reimbursement payments will be made via ACH (direct deposit) to the traveling employee's bank account. Employees will be reimbursed for actual expenses allowable according to the parameters of this Policy upon submission of a properly completed and approved expense report accompanied by required

supporting documentation. Reimbursement for out-of-pocket business expenses must be submitted within 12 months of the purchase date. The destination and business purpose of each trip and/or mode of travel must be included on the expense report. Incomplete forms or forms lacking appropriate receipts, approvals, or other required documentation may result in reimbursement delays, denials, or unprocessed expense reports.

Expense reports must be submitted within 30 days following completion of a business trip or the occurrence of the expense event. Each employee must submit his/her own expense report. Failure to submit Corporate Card charges within 60 days of the corporate credit card transaction date via an expense report will result in a 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 an expense report explaining the business purpose of the charges.

While traveling, paying for expenses for another NBCU employee is not encouraged except in rare instances where the colleague will not be issued a Citibank Visa Corporate Card. Every employee is responsible for the review and submission of their business expenses. A delegate may be utilized to create an expense report; however, the employee must perform a final review of expenses and submit the expense report.

1.4 Receipts

All food and beverage expenses greater than \$250.00 (inclusive of taxes and tips) require the submission of both a signed receipt and a detailed (itemized) receipt. This includes business meals and/or business entertainment with clients, vendors or employees. You will need to submit the itemized receipt that shows what was ordered, plus tip, along with the credit card receipt with your signature. This is a global requirement.

All other receipt requirements for expense documentation can vary depending on the country where the employee is based (many countries require all receipts, regardless of amount). The guidelines below are for employees on the US payroll. Employees located in other countries should consult their country-specific policy addendum for guidance on receipt requirements. All hotel folios (must be in local currency) and itemized rental car receipts are required, regardless of the amount of the charges. Some vendors provide e-receipts, which eliminate the need for paper copies of these documents. For other types of T&E expenses, U.S. based travelers must provide all receipts, except for the following:

- Domestic Corporate Card charges

- Cash items less than \$25

If receipt is lost or unavailable, employee must complete the electronic “Missing Receipt Affidavit” located under the Receipts tab in the expense report. This form can only be completed by the employee and not an expense delegate.

1.4 a Receipts Incurred outside the US by US based Employees

Original paper receipts are required for VAT reclamation purposes. Concur will prompt you for receipts for required countries, view FAQs for details. All hotel bills must be addressed to NBCUniversal Media LLC - not your home address. All hotel, meal and car rental original paper bills with vendor VAT number and invoice number must be mailed to NBCUniversal Travel (30 Rockefeller Plaza, Campus 620 – Desk 3453-D, New York, NY 10112).

1.5 Direct Billings

No employee has the authority to have travel, lodging, meals, or entertainment expenses billed directly to the Company, except where the Company has established an existing account and granted consent to the employee to charge to that account.

1.6 Review and Approval

It is the sole responsibility of the Manager to question and reject any submitted expense that is not in accordance with this Policy. Failure on behalf of the Manager to accurately review expense reports may result in disciplinary action up to and including termination of employment.

II. CITIBANK VISA CORPORATE CARD

Employees who incur regular business-related expenses should apply for the Citibank Visa Corporate Card. The Citibank Visa Corporate Card is the required method of payment for all NBCUniversal business-related travel and expenses. Eligible nonunion employees who spend more than \$1,000 per year must have an active Citibank Visa card. To request a card or a change in credit limit refer to <http://travel.nbcuni.com>.

The employee is personally responsible for all charges to the Card. Fees related to “rewards” programs and special promotions are considered personal and will also not be reimbursed. The Citibank Visa Corporate Card **may not** be used for any Non-NBCUniversal business expenses.

2.1 Chip and Pin

The Citibank Visa Corporate card is a chip and pin card, to activate the card the employee is required to establish a four-digit pin. This pin will be used every time the employee inserts the card into a chip and pin terminal at the time of the transaction. The first time the employee uses the chip feature on the card, the employee must use a terminal attended by a person. The card will be inserted into the terminal, the employee will enter his/her pin, the transaction will decline at first, but once reprocessed the transaction will be approved. Refer to the FAQs for additional details.

2.2 Fraud Identified by Citibank

Citibank may contact the employee concerning possible fraudulent transactions on the corporate card. The employee must immediately contact Citibank at 800-248-4553 to confirm if the highlighted transactions are valid. Citibank will then credit the employee's corporate card for the fraudulent transactions. All debit and credit transactions must be submitted by the employee on an expense report within 60 days of the transaction date to prevent card suspension.

2.3 Transactions in Dispute

The employee should contact Citibank at 800-248-4553 to raise a dispute for specific transactions. Citibank will then contact the vendor on the employee's behalf to dispute the transaction. A credit may be issued to the employee's corporate card which then needs to be submitted on an expense report within 60 days of the transaction date to prevent card suspension.

2.4 Personal Charges

The Citibank Visa Corporate Card is NOT to be used for personal expenses. The purpose of the card is to facilitate business payments only. Albeit, NBCU encourages the partial allocation of charges as personal when appropriate. For example, paying for a movie at a hotel which is not an allowable expense and the employee didn't have time for a revised invoice. Or, the employee goes out to dinner and orders an expensive bottle of wine- the difference should be allocated and indicated as "personal". (See check box in Concur)

If an error did occur and a personal charge was made; please mark the item as "personal" in Concur and submit repayment to NBCU through the following Citibank URL: [Click To Pay](#). If the corporate card is used inappropriately more than three times in a rolling year, the employee's card is subject to suspension. To reactivate your card, your Manager must send an email with this request to travel.admin@nbcuni.com.

If monies are owed to the company for personal transactions, the employee must:

- 1) Submit payment through [Click To Pay](#).
- 2) Enter your SSO and a few additional details, including the REPORT KEY found in the expense report header (Print/Email > Report Cover Page).
- 3) Enter in the amount you owe to NBCU and your personal banking details for the payment.
- 4) Click PAY to process the payment and you will receive a completed payment email:

The payment must be received within 60 days of submitting the expense report to prevent the employee's corporate card from suspension.

III. TRAVEL PROCEDURES AND RELATED EXPENSES

Employees are expected to exercise good judgment and observe normal safety precautions while traveling on Company business in a cost-efficient manner. As stated above, the destination and business purpose of each trip and/or mode of travel must be included on the expense report.

3.1 Travel Services

Selection of airlines, rental car, hotel, ground transportation, and related travel services must be made through the NBCUniversal Travel website: <http://travel.nbcuni.com> or directly in www.concursolutions.com.

In all cases, travel arrangements are to be made at a reasonable cost consistent with achieving the goals of the business trip. BCD is to be contacted for business travel only.

3.2 Traveler Profile

In those locations where Concur is the required travel booking system, all NBCUniversal employees who travel should have a Traveler Profile on file with Concur. The Concur system can be reached from the NBCUniversal Travel website: <http://travel.nbcuni.com> or directly to www.concursolutions.com.

The travel profile contains all the relevant information and personal preferences needed to process a reservation in an accurate and expeditious manner. The travel profile in Concur must match the traveler's government documents. To update the name displayed in Concur, contact HR.

3.3 Travel Insurance

Employees are automatically covered by NBCUniversal's Accidental Death and Dismemberment insurance at no cost while traveling on Company business. Additional travel insurance is regarded as a personal expenditure for which reimbursement will not be made.

3.4 Taxicab/Car Service/Uber/Lyft

The destination and purpose of each ride must be indicated on the expense report. As a guideline, the lowest cost method of transportation should be selected. The company has negotiated rates and insurance requirements with certain car service providers. Please visit the NBCUniversal Travel website <http://travel.nbcuni.com> for a list of vendors and requirements for usage. Note that gratuity has been negotiated into preferred car service vendor's rates, additional gratuity to drivers will not be reimbursed by NBCUniversal.

When traveling, only the Corporate T&E Visa card (P-Card is for production travel only) should be used. Anyone without a Corporate Visa Card may use a personal credit card and submit an expense report for reimbursement.

Approved car service, taxis or Uber/Lyft are allowed for trips from work in Manhattan to home in NYC (includes boroughs) between 9pm and 6am – if the employee has worked more than 10 hours in the day.

Uber is allowed when it is most economical. Employees may only use Uber Pool and UberX. UberBlack, UberXL and UberSUV are NOT in policy and should only be used in emergency scenarios.

Lyft is allowed when it is most economical. Employees may only use Line (ride sharing) and Lyft. Lux, and Lux SUV are NOT in policy and should only be used in emergency scenarios.

3.5 Travel to/from Airports

The NBCU black car services as described on the NBCU travel website should be used. Uber/Lyft should not be used for the airport due to variable pricing vs. NBCU negotiated fixed rates (refer to website for common airport rates). In the NY Tri-State Area the "Black Car companies" can be contacted by calling 212-664-7433 (212 664- RIDE).

3.6 Air Travel

Air travel should be purchased at the lowest possible price consistent with good business practice and without any significant inconvenience to the traveler. All air travel must be booked through Concur/BCD Travel who is the required travel agent. The travel website has been configured to offer travelers the lowest possible rates. Whenever possible, employees must fly on preferred (contracted) airlines where NBCUniversal has a negotiated discount.

Employees are expected to take the lowest logical non-stop offered, unless there is a valid business reason to take an alternate flight.

Travelers may choose to select flights with stops or connections which may result in a more substantial discount providing all other low airfare policy objectives are met. Alternative airports and low-cost airlines will occasionally be suggested when they fall within the parameters of the NBCUniversal lowest possible airfare policy. Do not contact BCD Travel regarding airfare upgrades or travel mileage questions.

3.6.1. Flight Class

Unless otherwise permitted, coach class is required for all U.S. domestic flights excluding Hawaii and Alaska. There is a defined population of employees who are permitted to travel in another class of service. These individuals will be contacted by HR and are required to comply with the guidelines for those flight class designations. Nothing contained herein shall preclude an employee from utilizing an upgrade certificate personally obtained by the employee.

Employees who are at VP level or below with international flights greater than six hours are eligible to upgrade one-cabin. Premium economy is required when available, otherwise business class is permitted. Each business has the ability to be more restrictive and not allow the upgrade.

Charges for extra legroom, plus preferred seating and accessing wi-fi during flights are reimbursable business expenses.

3.6.1a Exception Process

In the instance in which an employee wants to request a travel upgrade (outside of their designated flight class), the employee must request approval from their Manager. If the Manager believes there is a business reason for an upgrade, the Manager must then forward the request to the

Business CFO. Following the Business CFO approval, it will require the approval of the NBCUniversal CFO and/or designee's approval.

If a traveler would like to upgrade their flights with frequent travel miles or by paying the additional costs, the traveler would need to call the airline directly. The additional charges for the upgrades are non-reimbursable.

3.6.2. Flight Arrangements

Ticketing arrangements should be made as early as possible to take advantage of all available discounts or promotional programs, including those requiring cancellation fees. The NBCUniversal Travel website will choose the most cost-effective routing based on the lowest airfare available that satisfies the business objectives of the NBCUniversal traveler. Generally, non-refundable tickets will be issued.

Airfare must be booked on the employee's corporate card. If they do not have a card yet, their manager's card must be used

Only in circumstances when reservations cannot be made or managed online (e.g. production related travel) should employees call the NBCUniversal Travel Center:

- US-based travelers can call +1 (855) 844-NBCU (6228)
- Numbers for other countries are available on the NBCUniversal Travel website <https://travel.nbcuni.com>

For unexpected or emergency changes in travel plans while on the road, please contact BCD Travel's 855 844-6228. When traveling outside the US +1 (818) 487-0933. Please note that the Company incurs additional costs when these calls are made outside of normal business hours.

If you are traveling outside your home country and need to update your travel arrangements, you must contact your home country BCD Travel office. (e.g. the BCD office who booked your original ticket).

Please contact NBCUniversal's Global Mobility Services prior to booking any Relocation travel.

3.6.3. Employees Traveling Together

In order to preserve the continuity of the NBCUniversal Management team, the Company limits the number of Company management personnel flying corporate, charter or commercial aircraft together.

When using aircraft for travel, it is the responsibility of the most senior management member on the flight to determine in his/her good faith judgment, if the combination of the Company officials on the same aircraft poses a substantial risk to the continued operations of the Company in the event of an accident. Traveling together does not alter any employee's flight class designation for that trip.

3.6.4. Denied Boarding Compensation

NBCUniversal employees are not permitted to volunteer their reservation or make themselves eligible for any compensation relating to an airline over sale situation if such action results in additional expense to the Company or loss of any work time.

3.6.5. Frequent Flyer Programs

Employees are permitted to keep any frequent flyer points earned as a result of traveling on NBCUniversal business. However, any unauthorized travel, airline favoritism, circuitous routings, or other activities specifically designed to accumulate frequent flyer points is strictly prohibited.

3.6.6. Unused Tickets

When tickets are unused or partially used, travelers must designate this ticket status within the expense report in Concur.

Unused ticket credits which can be used for future travel are being tracked by BCD Travel and Concur. You will be prompted to use the unused ticket credit when booking your next trip.

3.6.7. Excess Baggage

Many airlines changed their checked baggage policies and now charge for either the first or second bag checked. Baggage fees are generally reimbursable. However, NBCUniversal employees are expected to minimize the occurrence of these fees and check the fewest number of bags possible. Additional checked baggage as required for business needs is also allowed, but employees should follow their business policy and applicable laws for shipping equipment, tools and/or merchandise. Refer to Travel website <http://travel.nbcuni.com> for Media bags process and pricing.

3.6.8 Lost Luggage

Lost luggage must be reported directly to the airline at the arrival airport location by completing the airline's required paperwork.

Citibank Visa Corporate Card provides benefits for permanently lost, damaged or stolen baggage or personal articles while checked with or carried on a common carrier, when the entire common carrier fare is charged to your Citibank corporate Visa card. The cardholder must also inform Citibank within 45 days of the date of the loss, theft, or damage. Employees may file a claim if calling stateside by calling toll free stateside (800) 586 8458. If calling from outside the U.S., call collect by dialing (804) 673-1164.

3.6.9 Private Plane and Chartered Flights

Employees are not permitted to pilot private planes/rental aircraft or arrange chartered flights when traveling on Company business due to potential liability and insurance issues.

If chartered flights are required, please contact John Harris, EHS Production Manager, Transportation: 818-777-2945 or john.harris@nbcuni.com.

3.7 Automobile Travel

3.7.1 Personal Auto

NBCUniversal will reimburse employees only for mileage that qualifies as business mileage under the U.S. Internal Revenue Code or applicable international tax code. Mileage incurred on Company business for employees on the U.S. payroll will be reimbursed at the prevailing IRS rate which is programmed into Concur. 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 and cannot be expensed through the T&E reporting system. Mileage to airport/train station is allowed only to the extent that it is greater than his/her normal commute.

3.7.2 Automobile Rental

All car rentals must be booked through Concur or directly with Hertz or using the NBCUniversal Corporate Code 50013 and charged to the Citibank Visa Corporate Card when the Card has been issued. Following this procedure ensures that car rental is covered by NBCUniversal's insurance program. If vehicle required is not available through Hertz, i.e. Production vehicle, or is not available in the city in which you are

traveling, National/Enterprise is a secondary option, please use contract number XZ17C52 for all National/Enterprise rentals.

3.7.3 Car Size

When one or two employees are traveling, a midsize or intermediate (“C-intermediate”) size rental auto should be used. When three or more employees are traveling together, they should request a standard, full size, or the minimum size automobile necessary to conduct Company business.

3.7.4 Rental Agreement Insurance Coverage

Loss Damage Waiver (LDW) and personal accident insurance should be declined on all Hertz and National/Enterprise rentals within the US. For locations outside of the US, refer to the travel website <http://travel.nbcuni.com> for your specific country requirements. Employees using a rental car for business purposes are covered by the Company’s insurance program. Employees are permitted to request the NBCUniversal rate for personal use however it must be paid with their own personal credit card and they should purchase the insurance.

3.7.5 Refueling

Travelers ***should not*** purchase the fuel service option offered by Hertz and National/Enterprise. Employees are required to return the car with a full tank of gas whenever possible unless circumstances prevent the car from being returned with a full tank of gas. Fuel charges are reimbursable to the employee.

3.7.6 Car Rental Receipts

A receipt is required for all car rentals.

3.7.7 Driver’s License Requirements and Insurance

Employees operating a vehicle (rental, personal or Company-owned) on Company business must have a valid, current driver’s license. Employees who use their automobile for business purposes shall maintain a minimum of insurance coverage equal to that required under state law.

3.7.8 Parking and Tolls

Parking fees and tolls incurred while traveling on Company business are reimbursable expenses. Receipts should be obtained where required.

Parking and tolls will not be reimbursed for travel to and from work at the normal work location.

3.7.9 Traffic Fines

Fines for parking or moving traffic violations are not reimbursable (except as approved at the Company's discretion).

3.7.10 Commuting Expenses

Expenses incurred (mileage, fuel, parking, and tolls) commuting to and from work at an employee's regular work location on regular work days are not considered "travel" and are not reimbursable.

3.7.11 Rail Travel

Travel by rail on Company business shall be at economy rates. Amtrak or Acela Express business class travel is authorized when necessary to meet timely arrival at a destination. First Class travel is prohibited.

3.7.12 Personal Travel and Travel of Spouses

Family Member Expenses

There may be instances in which the presence of an employee's spouse or domestic partner serves a bona fide business purpose. Establishing a business purpose for spousal/domestic partner attendance generally requires more than simply asserting that spouses are required to attend or that their presence will facilitate social interaction among employees. In particular, a spousal business purpose is most effectively established if there are scheduled business-related activities specifically for spouses. Documentation should be retained to show details of planned spousal activities. When a spouse/domestic partner is involved in activities involving customers, his or her specific assignment should be documented in writing to avoid taxable personal income. Reasonable expenses for spouses in such cases may be reimbursed. Therefore, ANY business travel that includes family members MUST be coordinated AND documented through the Human Resources team

Combining Company and Personal Travel

Employees may extend a Company business trip to include personal travel. In such instances, both the employee and approving Manager

must exercise care to avoid the appearance of unnecessary or poorly timed business travel to finance a primarily personal trip.

Weekend stays are considered business travel if business is conducted over the weekend. Employees must use personal credit cards to pay for any expenses related to the personal portion of the trip.

3.7.13 Telecommunication Charges During Travel

Charges for business-related telecommunication services and reasonable charges for personal calls while out of the office are reimbursable. Telecommunications services include telephone calls, cell phone, and fax charges. Phone calls made directly from a hotel phone are prohibited due to the high access charges. Travelers may call (855)876- 6228 to be connected to the NBCUniversal switchboard to facilitate making office or other business calls. Cellular phones should be used whenever possible. When travelling overseas, employees must call NBCUniversal telecom to ensure that an international rate plan is effective. If telecom is not contacted, those calls will not be reimbursed.

IV: ACCOMMODATIONS AND MEALS

The designated online booking tool or designated travel agency must be used to book hotels. Specific hotel accommodations are designated for major cities where we normally conduct business, and travelers are required to use these properties.

4.1 Lodging and Accommodations

4.1.1 Reservations

All rooms must be booked using the designated online booking tool or travel agency available via the NBCUniversal Travel website <http://travel.nbcuni.com> to ensure use of all available discounts. Homeshare accommodations (Airbnb, VRBO, etc.) are not allowed due to Security and Duty of Care concerns. Exceptions must be approved by the Business CFO and Global Security.

For employees attending seminars, conferences or related meetings where a specific hotel has been contracted for the conference, the hotel reservations may be made through the sponsoring organization provided that this rate is lower than the corporate rate.

As a reminder, a copy of the hotel “folio”, including a record of charges, is the required receipt for hotel accommodations. Scanned/faxed images are required for all travel within the U.S. Original (paper receipts) are required for hotels in certain countries outside the U.S for VAT reclaim.

4.1.2 Booking Room Rates

Accommodations should be for a standard room only. Generally, upgrades to suites, concierge or executive floors are not permitted unless charged at the standard room rate. The rates for hotel reservations should be set when booking a reservation and should be confirmed at the time of check-in. Where the Citibank Visa Corporate Card has been issued, all hotel expenses must be charged to the Card.

4.1.3 Room Guarantees

Rooms should be guaranteed to the employee’s individual Citibank Visa Corporate Card (where issued). Employees are responsible for canceling rooms if plans change. Hotel “no show” charges are not reimbursable, except upon the approval of employee’s Manager.

4.2 Meals

4.2.1 Personal Meals – Per Diem

Each NBCUniversal business may authorize “Per Diem” reimbursement at its own discretion. If not determined by Union Contracts, reimbursement rates should be at or below established government limits. Businesses are responsible for determining and ensuring compliance with all relevant payroll or other tax reporting caused by payment of Per Diems.

- 4.2.1 a** Individual meals for employees are reimbursed when traveling outside an employee’s normal business site(s). Meals delivered onsite should be kept to meals provided during all-day work events/meetings. Scheduling events/meetings during lunch, to provide lunch, is prohibited. All meals must be clearly documented with the Business reason for the meal.

4.2.2 Meals for Two or More Employees

When two or more employees travel together, each should report only his or her meals. When it is not practical to do so, however, the more senior

employee should cover the business meal expense. The business meal must be reported as “Meals Multiple Attendees”.

In addition, employees with titles at or above Senior Vice President may, on occasion, take personnel out for a business meal. These meals may or may not occur while employees are traveling. The cost of the meal should remain as reasonable as possible. The business meal must be reported as “Meals Multiple Attendees” by the person with the title at or above Senior Vice President.

V. ENTERTAINMENT

Employees shall be reimbursed for reasonable entertainment expenses, provided that such expenses are incurred for a valid business purpose. This section of the policy applies to activities or events focused on customers.

5.1 Reimbursable Entertainment Expenses

5.1.1 Business Entertainment

Business entertainment includes the following if attended by the organizer (or NBCUniversal Employee) and during which business matters are discussed: meals, entertainment, participation in recreational activities or events, and tickets, passes or other access to cultural or sporting events. Entertainment expenses are reimbursable only if they are directly related to Company business. This means that (1) business must actually be conducted either during the entertainment or immediately before or after and (2) there must be an expectation that the Company will derive a business benefit from the entertainment (other than the goodwill of the person or persons entertained). This does not mean that the Company is required to show that income or another business benefit actually resulted from each and every entertainment expenditure. Employees must avoid situations where it might appear that business entertainment is being offered in exchange for a particular business benefit, such as a contract for purchase of services or equipment. Rather, business entertainment events should be used as an opportunity to promote NBCUniversal's products and services and to learn more about the customer's, or prospective customers, business.

In order to qualify for reimbursement, employees must be able to document the business purpose and provide documentation that supports the amount of each expense, the date and place of the entertainment, and the business relationship of the persons entertained. If only NBCUniversal employees are

present, expense should be classified as “Entertainment- Employee (non-client)”.

Please refer to the NBCUniversal Business Entertainment Guidelines which clarify the factors to be considered before accepting, offering, and where required, seeking pre-approval for, business entertainment.

VI. REIMBURSABLE EXPENSES

The following types of personal expenses will generally be reimbursed to the traveling employee:

6.1 Personal Property Loss/Damage

Pending Manager approval, employees shall be reimbursed for personal property (necessary for the purpose of a business trip) that is lost or damaged due to fire, theft or natural disaster while traveling on business, unless the loss or damage is due to lack of care on the part of the employee. An explanation of the incident and appropriate documentation to substantiate the loss, such as a police report, must be submitted for reimbursement.

6.2 Laundry and Valet

Reasonable laundry and dry-cleaning expenses are reimbursable business expenses on trips for 4 or longer consecutive nights. Reasonable clothing pressing expenses are reimbursable on trips longer than 2 consecutive nights. Maximum amount allowed is up to \$30.00 for laundry and dry cleaning and \$15.00 for pressing for each occurrence, respectively.

6.3 Tips

Reasonable tips for porters, baggage handling or similar services are reimbursable business expenses.

6.4 Office Supplies

Out-of-pocket purchases for office supplies (stationery, postage) while traveling are generally reimbursable expenses provided that they are bona fide business expenses.

6.5 Gym Costs

Employees may be reimbursed for gym costs while out of town on business. Gym membership and packages are not reimbursable. Spa services are not reimbursable for employees.

6.6 Internet Services

Charges for business-related wireless internet connection in the hotel room are reimbursable. Wireless internet connections at “hotspots,” including those on airplanes, are reimbursable. Reimbursement for airplane wi-fi subscriptions (*i.e.* Go-Go, etc.) are not reimbursable unless employee is a frequent traveler where a subscription will save the company money.

Expenses relating to internet, cable & wireless services at employee’s homes are not reimbursable.

VII. NON- REIMBURSABLE EXPENSES

7.1 Adult Entertainment

Adult entertainment is not a reimbursable expense in any circumstance. Regardless of local practices in countries where the Company conducts business, NBCUniversal will not allow Company funds to be used for the purchase of adult entertainment. “Adult entertainment” is defined as nightclub type entertainment that includes shows or other activities with overtly sexual content (e.g. topless bars, strip clubs, etc.).

7.2 Gifts

- Business Gifts/Flowers to employees for lifecycle events (birth, wedding or engagement, hospital stay or death in immediate family) up to \$150 is allowed. One gift per event from the Company (*i.e.* not per employee) up to \$150 is allowed. (Gifts may only be purchased for the employee not their family members). Gift amounts above and beyond this company policy must be purchased/paid for personally.
- **Gifts to clients/talent/non-government employees should be kept to less than \$250 in total per year.** Gift amounts above and beyond this company policy must be purchased/paid for personally.

- **7. 2a Personal Expenses Generally Not Reimbursable**

- Personal Items: Employees will not be reimbursed for personal items such as clothing, haircuts, drugstore items, personal reading material, the theater, or other personal amusements.
- Damage to Personal Items: Damage to or loss of personal items such as cameras and jewelry that are not required for business purposes are the responsibility of the employee and should be covered by personal homeowners' or supplemental insurance.
- Damage to luggage or briefcases caused by normal wear and tear.
- Business Gifts/Flowers: Gifts to employees are prohibited [(which include: Birthday Gifts or Birthday celebrations for NBCUniversal employees; Leaving the company gifts (non-retirement)], and will not be reimbursed, except for lifecycle (birth, wedding or engagement, hospital stay and death in immediate family) events. One gift per event from the Company (*i.e.* not per employee) up to \$150 is allowed. (Gifts may only be purchased for the employee not their family members). Gifts for retirement must be coordinated through the Human Resources department. All Gifts are to be purchased by the employee's Direct Supervisor. A clear business reason for the gift must be included. Gifts not within NBCU Policy may be rejected and if so, will be paid by the purchaser.
- Individual employee anniversary year acknowledgements will not be reimbursed as NBCU has a gift program for employees' milestone anniversary dates.
- Travel passports, passport renewal fees, and expedited fees are not reimbursable.
- Subscriptions to streaming services are not approved business expenses unless pre-approved by the employee's Manager and documented in Concur with a clear business reason for this service.

Other non-reimbursable expenses include, but may not be limited to the following:

- Airline Club Dues
- Baby-Sitter Fees
- Sightseeing Expenses
- Child or Pet Care
- In-room movies at hotels
- Hotel phone usage
- Gift Cards
- Social clubs
- Birthday Gifts or Birthday celebrations for NBCUniversal employees
- Leaving the company gifts (non-retirement).

7.3 Items to be Paid Through Accounts Payable

Employees will generally not be reimbursed for items that can be ordered through established vendors and paid through the Accounts Payable Department unless there are extraordinary circumstances and it is approved by the Business CFO. Donations or Payments to Charitable non-profit Organizations must be processed through Accounts Payable, do not submit the payments through T&E, including donations in lieu of flowers for bereavement of an Employee's death in their immediate family.

7.4 Medical Expenses

The costs for medicine or medical treatment resulting from accident or illness while traveling on Company business are not reimbursable business expenses. The Company maintains health and worker's compensation insurance for this purpose and any claim must be processed through those channels.