



TRAVEL AND ENTERTAINMENT POLICY

INTERNATIONAL

This policy applies to all Interpublic Group of Companies (IPG) agency offices and its employees including IPG subsidiaries outside of the U.S. Variations to this policy may be necessary in different countries to accommodate international laws and tax regulations, and the provisions of this policy may be changed at any time by IPG. The expense policy guidelines define the policy and procedures pertaining to Travel and Entertainment (T & E), and Corporate Credit card expenses. It has been designed to provide guidance to employees, travel arrangers, and approvers on the effective management of T&E costs. It is intended to describe the types of business expenditures that are reimbursable. It is the primary responsibility of each business unit to insure that their employees are in compliance with this policy.

It is the policy of IPG to reimburse employees for reasonable and approved expenses incurred in the conduct of company business. Employees should neither gain nor lose personal funds as a result of a business assignment. The submission of expense(s) by the employee, and the approval by their department approver on an expense report, represents that all expenditures are in full accordance with IPG policy. Good judgment is expected of employees when incurring business expenses on its behalf.

The policies contained herein reflect the considerable trust IPG places in the honesty and integrity of its employees. All employees are expected to comply with the IPG Travel and Entertainment Expense and Corporate Credit Card Policy. Failure to do so, or misrepresentation of expenses, may result in disciplinary action, including denial of non-compliant charges and immediate termination.

The IPG designated Corporate Travel Agency (CTA) must be used for all business related travel reservations. Client contracts that require use of a non-IPG designated CTA must be reported to the IPG U.S. Travel Services Group (IPG Travel) for consideration and exception approval.

SCOPE

This policy applies to all employees of IPG operations and its subsidiaries outside of the U.S.

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3. SUSTAINABLE BUSINESS TRAVEL

As a client services business, business travel is essential to IPG providing best-in-class solutions for our clients. However, to limit the effects of climate change, it is the policy of IPG to continually find ways to reduce the environmental impact of employee business travel.

3.1 PURPOSE

We have adopted work-from-home protocols in response to the COVID-19 pandemic and increased our use of virtual meetings, telepresence applications, and other technologies whenever possible. As we return to the office, we shall continue to employ flexibility in our work model and expect that the continued use of alternative meeting and communication methods among employees and with clients will result in a reduced level of business travel. We welcome and encourage the reduction in emissions that will result from this shift.

In 2021, IPG established [new climate action commitments](#) to reduce our Company's greenhouse gas emissions. IPG's global climate commitments include sourcing 100% renewable electricity by 2030 and reaching net-zero carbon emissions by 2040. Additionally, IPG is setting a science-based target to guide our achievement of these goals. Reinforcing these commitments, IPG is a signatory and/or member of

various net-zero campaigns and coalitions, including: [AdGreen](#), [Race to Zero](#), [Business Ambition for 1.5°C](#), [The Climate Pledge](#), and [America is All In](#).

In line with our commitment to transparency and accountability, IPG tracks our emissions related to business travel, helping us better understand our environmental impact and identify opportunities to reduce our carbon footprint. This is vital to making progress toward our climate action commitments. IPG's program to track travel-related emissions was among the first to be instituted at a Fortune 500 company. IPG shares our global emissions and energy data, including business travel emissions, with employees and other stakeholders on a regular basis in IPG's annual sustainability report.

As a client-facing business, we understand the importance of in-person client communications and relationship building. We must balance this with the urgency of slowing global warming. In recognition of the impacts of business travel on the environment, IPG is implementing specific strategies to reduce carbon emissions associated with employee business travel and commuting, and to neutralize unavoidable emissions with carbon offsets. These strategies include regularly updating our travel policies, providing and promoting low-carbon travel and transport measures within our scheduling tools, and educating employees and managers on guidelines for low-carbon travel.

3.2 SCOPE

IPG's sustainable business travel policy applies to all subsidiaries in both domestic and international offices. The policy applies to IPG business travel, including billable travel unless the client directs otherwise.

3.3 TRAINING

The provisions of this policy, and its rationale, will be included in new-hire trainings at IPG to cultivate and maintain a culture of attention to our climate and environment.

3.4 POLICY REQUIREMENTS

IPG is committed to reducing our emissions by, among other strategies, limiting employee business travel in innovative ways that balance the relationship-building needs of a client services business.

Employees should consistently find ways to travel in a manner that is as sustainable as possible, with the ultimate goal of reducing emissions. These choices can also lead to cost savings, helping us align with our clients' expectations and our own commitments. We will demonstrate our responsibility to all of our stakeholders by continuing to track our travel and emissions related to that travel.

IPG's sustainable business travel policy requires every IPG employee to:

1. **Carefully consider the need to travel**, as follows:
 - Employees should carefully consider essential roles and responsibilities for a meeting and/or client relationship, and minimize the number of employees traveling when possible.
 - When evaluating whether to travel, consider if technology might be used as an effective way to accomplish your business goals.
 - Travel blending (combining a trip with another purpose) should be considered in balance with the health, family and other work-life needs of the employee. Travel blending refers to accomplishing more tasks on one trip rather than making multiple trips at different times, with the aim of reducing the impacts of travel.
2. **Identify least emitting option for air travel:** In 2014, IPG introduced an enhancement to IPG's online booking tool (SAP Concur) for our business travelers to sort possible flights by carbon dioxide (CO₂) emissions as well as by timing and cost. In 2021, IPG implemented additional updates to this tool to better help employees identify more sustainable airline and hotel options. When travel is necessary, employees must use these tools to choose the optimal itinerary that accounts for cost, preferred vendors, employee wellness, and minimizing carbon emissions. We will continue to promote tools that further assist employees in achieving these goals.
3. **Prioritize electric or hybrid vehicles:** When driving for business-related travel, employees should rent (or hire) an electric vehicle or a plug-in hybrid, wherever possible, or select the most efficient model for miles per gallon (MPG).
4. **Book sustainable accommodations:** IPG is continually updating its travel tools with features to support sustainable travel (SAP Concur and IPG's Hotel Health and Wellness Reference website). These tools include displaying the sustainability criteria of hotels and accommodations, with a focus on low-carbon strategies (e.g., LEED certified hotels). Employees are expected to utilize these tools and resources when making travel arrangements.
5. **Protect employee health and wellness:** In 2021, IPG launched the Hotel Health and Wellness Reference site to actively foster wellness for business travellers. Employees should utilize this site in support of their health and wellbeing while travelling.
6. **Offset carbon emissions:** When employee business travel is necessary, IPG is working toward neutralizing all emissions from air travel, through purchasing carbon offsets and continuing to explore and monitor alternative offset methods, such as the use of sustainable aviation fuel (SAF). This strategy will help ensure IPG reaches net-zero carbon by 2040.

4. PRE- AND POST-TRIP PLANNING

4.1 Client T&E Policies

When a client requires agency personnel to comply with its or a project-specific T&E policy, that client policy supersedes the IPG policy. If the client T&E policy is more restrictive than the IPG T&E policy, the employee will be reimbursed the full amount of the expense up to the IPG allowable limit. Though the employee will be reimbursed in accordance with the IPG policy, the client policy will be used to determine billable versus non-billable expenses. If the IPG policy is more restrictive than the client policy, the employee should follow the IPG policy. If local statutory requirements only allow for certain types of expenses or amounts, those requirements must take precedent.

4.2 Billable and Non-Billable Expenses

All expenses must be clearly designated as either client billable, client non-billable, or agency non-billable. For client billable and client non-billable expenses, all relevant information (e.g., client name, job number, etc.) must be included with the expense report.

4.3 Exceptions to Policy

Exceptions to this policy, whether booked through the CTA or the Corporate on-line booking tool, where applicable, require pre-approval from IPG Travel unless otherwise indicated in this policy.

4.4 Pre-Trip Approval

Requirements for pre-trip approval are established at the agency level by the local agency CFO or Financial Director.

4.5 Receipt Requirements

Original receipts for all expenditures greater than or equal to \$75.00 USD or the local currency equivalent, are required to qualify for reimbursement. If client billing and receipt requirements or statutory requirements are more restrictive than the foregoing, that shall take precedence over the IPG requirement. Local agency management may choose to have a more restrictive receipt requirement, if they so desire.

Photocopies of receipts and credit card statements are not considered acceptable documentation for receipts (see **VALUE ADDED TAX (VAT) RECLAIM** section).

In countries where an IPG Expense System has been established, a receipt report will be generated identifying which receipts are required for submission. Receipts, along with the fax cover sheet, must be submitted when submitting expense reports.

4.6 Expense Report Approval/Authorization Process

Local agency management may also have a more restrictive approval/authorization process if they desire. No employee is authorized to approve their own, a peer's, or a superior's travel expense report. Each employee expense report should be reviewed by the Department Head and Senior Finance Director for:

- Approval signatures
- Business purpose (including those expenditures under the \$75 receipt threshold)
- Correct totals
- Supporting documentation and receipts
- Travel Itinerary from the CTA

4.7 Submission Frequency

All Travel and Entertainment related expenses should be promptly submitted to the designated approvers, and once approved, processed for payment.

All client billable credit card expenses should be submitted within 14 days or sooner after expense incursion or trip completion to avoid interest and penalties that are not reimbursed.

Local office non-billable expenses should be submitted within 14 days or sooner of expense incursion or trip completion and should be aggregated where possible when multiple reports are being filed.

Expenses filed after 60 days must be approved by the local agency Chief Financial Officer (CFO).

4.8 Combining Personal Travel with Business Travel

Employees who wish to combine vacation before or after a business trip may do so. Employees are required to pay for the personal portion of their trips using personal credit card, cash, or other non-corporate card methods. "In lieu of" and "tradeoff" expense reimbursement is not permitted (e.g., although incurring a Saturday stay reduces the cost of your flight, you may not use the difference to offset all or part of your personal expenses).

4.9 Converting Foreign Currencies

Expenses incurred and paid directly by the traveler are converted at the actual exchange rate supported by the original foreign currency exchange receipts, or the employee's corporate credit card billing statement.

4.10 Value Added Tax (VAT) Reclaim

VAT may be “reclaimed” for certain business expenses incurred overseas, particularly in Europe and Canada. IPG submits applications for VAT refunds annually. European employees should also be aware that for travel to other European and non-European countries there is also scope to reclaim VAT on certain business expenses. In addition to the standard receipts required for expense reports, international travellers must save original receipts for the following business expenses: lodging, entertainment, gasoline, meals, car rentals, rail travel, conferences, trade shows, training courses and certain professional fees, etc.

All receipts must be submitted within 30 days upon return with the traveller’s expense report. Only original, itemised receipts are acceptable for VAT reclaim purposes. Charge card receipts are not acceptable.

5. CORPORATE CARDS

5.1 Eligibility

In those jurisdictions where IPG has established a Corporate Card program: Argentina, Austria, Australia, Bahrain, Belgium, Brazil, Chile, China, Colombia, Denmark, Egypt, Finland, France, Germany, Greece, Hong Kong, Hungary, India, Ireland, Italy, Japan, Kuwait, Lebanon, Malaysia, Mexico, Netherlands, New Zealand, Norway, Peru, Philippines, Poland, Portugal, Qatar, Romania, Saudi Arabia, Singapore, South Africa, Spain, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, and United Kingdom all employees who travel or incur business expenses two or more times per year must have an IPG issued Corporate Card. There is no cost to the employee. All business related expenses must be placed on the Corporate Card in the employee’s name. Employees are responsible for ensuring timely submissions of expenses and/or payment of all charges due. IPG will not reimburse employees for: non approved credit card fees; reward program fees; or late payment or interest charges. If an account exceeds 60 days past due, the employee is in jeopardy of having their Corporate Card canceled by

the Corporate Card vendor and incurring additional delinquency charges until satisfied. Failure to adhere to these procedures may result in disciplinary action and/or termination. Contact your Corporate Credit Card/ Human Resource Administrator for Corporate Card payment information.

5.2 When to Use

IPG has mandated that the Corporate Card be used by employees for all T&E. Only business related purchases are permitted to be placed on the Corporate Card and employees are restricted from using it for personal expenses. Employees are also restricted from using their corporate credit card for the business expenses of another employee and may not be used as payment for company meetings or events. Cash advances on these cards are not permitted.

In the event that the individual Corporate Card program has not been established at your agency or, if you are a new or existing employee and have not yet applied for an individual Corporate Card, the CTA, where designated, will obtain permission to charge Air/ Rail reservations to your company’s centrally billed lodge credit card account (contact your local finance department for details on how to expense these charge types).

Personal cards may only be used if the individual Corporate Card is not accepted and the charge cannot be handled by your company’s central bill account.

5.3 Employee Termination

Upon termination of employment, Corporate Cards must be returned to your designated Corporate Card Administrator or to Human Resources at the exit interview and all outstanding balances must be satisfied in full on the account prior to your last date of employment.

5.4 Payment Responsibility

Employees are responsible for ensuring timely payment to the Corporate Card provider, either through the IPG Expense System or directly, paying in full for all outstanding charges prior to the payment due date to avoid delinquency charges.

5.5 Delinquency

Should an employee's Corporate Card become delinquent, IPG's credit card administrators will notify the employee directly, as well as, the employee's local Senior Finance administrator. The employee will be expected to immediately satisfy all unpaid balances. If not immediately satisfied, the employee's CFO will be notified, the privilege of using the Corporate Card will be revoked, and future travel by the employee will be prohibited.

The employee's personal credit history will be affected if the Corporate Card is delinquent or canceled by the Corporate Card company.

5.6 Corporate Meeting Cards

Business related expenses for Corporate Purchases, Meetings and Events should be placed on an IPG issued Corporate Meeting or Events Card. It is against IPG policy for any employee to use a personal or non-approved IPG issued credit card for the purchase of:

- Events including but not limited to award entry fees, catering, floral, audio visual, event car/limo services, group meals, printing services, equipment rental, furniture rental, event signage, subscriptions, event supplies, event or sports tickets, digital studios, book purchases for author signings.
- Corporate Meetings including but not limited to hotel prepaid room blocks, hotel meeting space, hotel food and beverage, car/limo services, conferences, trade shows, conventions, employee outings for any/all IPG sponsored or client billable Events.

The issuance of Corporate Meeting or Event Cards must be reviewed and approved by IPG Global Travel Services and by local or Worldwide CEO/CFO.

5.7 Reporting Lost/Stolen Cards

A lost or stolen Corporate Card must be reported immediately to your Corporate Card/Human Resource administrator and the Corporate Card company as soon as the traveler discovers it is missing. Data indicates that unauthorized use of stolen cards is greatest in the first few hours after the theft or loss.

5.8 Rewards Points

Corporate Card providers extend card members the opportunity to join their rewards program. Fees for enrollment, or to reinstate rewards points, are not reimbursable. Employees may keep earned awards.

5.9 AMEX Online

American Express allows you to view your AMEX Corporate Card Account Online once you have registered your account number. For registration information, please contact your local Corporate Credit Card/Human Resource Administrator.

5.10 Corporate Credit Card and Traveler Benefits

Contact your Corporate Credit Card/Human Resource Administrator for Corporate Card information or applications, as well as country specific Traveler Benefits information.

5.11 Travel Insurance Coverage through the Corporate Card:

Under the terms of IPG's agreement with its Corporate Card vendors, all employees with a Corporate Card automatically receive travel insurance coverage. For more information on the insurance coverage details, please access the Corporate Travel website at <http://travel.interpublic.com>

6. BOOKING RESERVATIONS

6.1 Travel Agency

Where established; Argentina, Austria, Australia, Belgium, Brazil, Chile, China, Colombia, Denmark, Finland, France, Germany, Hong Kong, India, Italy, Japan, Kuwait, Mexico, Netherlands, Norway, Philippines, Poland, Portugal, Qatar, Romania, Singapore, South Africa, Spain, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, and United Kingdom, all business travel, including air, rail, lodging, rental cars, meetings, events and conventions, must be booked through the CTA. Use of a non-IPG designated CTA is prohibited. If there is a client contract requiring the use of another travel agency, this must be reported to the IPG Travel Services Group for exception approval prior to the use of that agency.

6.2 Corporate On-Line Booking Tool (TravelSource Direct)

The IPG on-line booking tool, TravelSource Direct, provides an easy, effective way for employees to book air, lodging, car rentals and other T&E services while accessing our IPG corporate discounts. Where applicable, TravelSource Direct shall be used by all employees for all:

- Domestic travel;
- Single-stop international round trip itineraries, absent a compelling business reason to the contrary; and
- All other travel requirements whenever practicable. TravelSource Direct fees are half the cost of the telephonic reservation; and more than half of the after-hour telephonic reservation fees.

6.3 Preferred Suppliers

IPG has negotiated significant discount agreements with major global airlines, hotels, and car rental companies. IPG travelers are required to use the IPG preferred vendors for all travel arrangements. The CTA, if designated, ensures that preferred vendors with IPG negotiated rates are used whenever possible. Traveler requested exceptions will be pre-approved by the local company CFO, or designated approver, and documented. Client specific exceptions will be allowed only if there is a documented business requirement.

6.4 Reservation Timing

Travel planning should be completed as far in advance as possible to obtain the lowest airfares and to secure first choice flight times and room accommodations. As it is not unusual for plans to change, your CTA, if designated, will issue airline tickets no earlier than 48 hours in advance of the flight in order to avoid unnecessary ticket transaction fees. If the airfare booked requires that the ticket is purchased sooner than the 48 hour period, the reservations will be ticketed in accordance with the airfare booking requirements.

6.5 Frequent Flyer/Guest/Reward Points

Travel arrangements should be made without consideration of point/incentives earned by employees.

6.6 Itinerary Changes

Should your plans change and necessitate a change in flight, hotel, or car reservation, contact the CTA, if designated, immediately. Employees should plan business trips in advance to avoid unnecessary change fees. These fees will be reimbursed provided there is a business justification.

6.7 Meetings and Events Reservations

Meetings should be held at company facilities whenever possible. Events held at a hotel for offsite meetings, conferences, trade shows, conventions, employee outings, and room rentals (Events), for any/all IPG sponsored, or client billable events, must be booked through the IPG approved CTA Meetings Services Department where established, or through the local CTA.

It is against the IPG policy for a contract to be signed by any IPG employee without obtaining prior review and approval by the IPG approved Meetings Services Department, where established, or the CTA, and the Vice President of IPG Travel. Once a contract has been negotiated and approved, it must also be signed by a VP level officer at the local agency

Contract & vendor payments for Events shall not be paid for by an employee Corporate Card. The CTA Meetings Services Department, where established, or the CTA, will arrange for payment to be made via an approved agency lodge or meeting credit card, or through accounts payable where applicable.

7. AIR TRAVEL

7.1 Booking/Fares and Ticket Types

- Where we have an established CTA, purchase of web fares is not permitted. Any exceptions must be pre-approved by IPG Travel.
- Air travel for group meetings and events must be arranged through the CTA, if designated, and paid for with your employee issued corporate credit card (where applicable)
- Transaction fees associated with business travel are reimbursable.
- Employees are required to utilize IPG’s online booking tool (SAP Concur) to find the best possible combination of cost and emissions, obtaining the lowest possible airfare that also takes into consideration emissions from a given flight. This means that employees must compare both the costs and the emissions of potential itineraries, book one of the most economical tickets, and the lowest-emissions option whenever financially feasible, use the Interpublic preferred airline carriers, and make arrangements without regard to frequent flyer or promotional programs.
- IPG requires the use of electronic tickets (e-tickets) to avoid fees for paper tickets and paper ticket delivery fees via courier. Paper tickets will only be issued if the airline does not offer e-ticket capability. The CTA, if designated, will issue, via e-mail, a full receipt package with all tickets.
- Non-refundable or restricted airfares that have advance purchase requirements should be booked whenever appropriate. These tickets types can cost up to 70% less than refundable tickets. Fees associated with changes for non-refundable tickets will be reimbursed provided there is a business reason.

7.2 Airports

Where multiple airport options exist, the CTA, if designated, will reasonably determine the most economical airport, when appropriate.

7.3 Non-Commercial Air Travel

Non-Commercial aircraft is defined as follows: chartered, leased, fractional ownership or wholly owned (private) ownership.

Non-commercial air travel will not be authorized. Exceptions will be forwarded to the IPG Travel and will ultimately require IPG CEO or CFO and IPG Chief Risk Officer approval.

Employee pilots are strictly prohibited from flying themselves, other employees and/or clients on company business on chartered, leased, fractional ownership or wholly owned (private) aircraft.

No employee is authorized to enter into any use or long-term contract or agreement on behalf of the corporation or its subsidiaries for the use of non-commercial aircraft or lease of any aircraft, including helicopters. This restriction applies even if the contract or agreement is being done on behalf of an IPG client.

For further information regarding non-owned aircraft mandatory requirements, conditions and restrictions see **SP&P 119** along with Interpublic’s Insurance Manual.

Tickets booked outside of this policy will be reported to management and are subject to non-reimbursement.

7.4 Preferred Airlines

IPG has negotiated significant global airline discount agreements including international alliances. IPG travelers are required to use the IPG preferred vendors for all travel arrangements. The CTA, if designated, ensures that preferred airlines with company negotiated rates are used whenever practicable. The CTA, if designated, will recommend the lowest fare within a 2 hour window of the requested departure time on any FAA approved carrier, which should be accepted if schedules permit. Traveler requested and approved exceptions will be documented. Client specific exceptions will be allowed only if there is a documented business requirement. For information about the preferred carriers, contact the CTA, if designated, or the Corporate Travel website at <http://travel.interpublic.com>

7.5 Airline Class of Service

Qualifications for the different classes of service:

| | |
|-----------------------|---|
| Coach Class | All domestic and pan-regional flights less than 6 hours in duration |
| Business Class | All intercontinental flights including transatlantic or transpacific destinations, and pan-regional flights of more than 6 hours in duration. |

Exceptions to class of service must have pre-trip approval by (i) the local agency CFO, CEO or designee or (ii) Worldwide or regional CFO, CEO or their designee. Exceptions should be granted for compelling business reasons.

7.6 Unused and Non-refundable tickets

Employees are responsible for informing the CTA, if designated, as soon as it is known that a trip needs to be cancelled. If your non restricted electronic airline ticket has already been issued, the CTA, if designated, will cancel the trip in its entirety and refund the ticket that was charged to your corporate card. Restricted tickets have no value unless the original reservation has been altered or changed. In this case, if there is a residual value, it will be applied to the exchanged ticket.

- Unused paper tickets must be returned to the CTA, if designated, within 5 days of cancellation.
- Unused paper tickets must not be sent to the airlines and must not be included with the expense report.
- Unused paper tickets that are not returned will not be reimbursed.
- The credit to your corporate credit card is to be issued by the airline, and may take up to 60 days to appear on your credit card statement. To avoid having to pay for a cancelled trip, the traveler must contact the credit card company and explain that this charge is in dispute due to an outstanding credit not yet applied.

7.7 Upgrades

Costs associated with upgraded fares are not reimbursable.

7.8 Airline Clubs

One airline club membership will be reimbursed to all employees who travel frequently (10 domestic or 5 international trips per year). Local CFO approval is required for reimbursement.

7.9 Number of Interpublic Group Employees on Same Plane

The number of company personnel traveling together on the same flight may not exceed the following parameters:

- No more than 4 employees per department are allowed to travel together.

- No more than one-half of any individual's direct reports are allowed to travel together.
- CEO, Chairman, and President of any entity are not allowed to travel together.
- IPG Corporate Chairman, CEO, or President, or any of their direct reports, are not allowed to travel together.
- No more than 18 employees of the entire corporation can fly together on commercial flights.
- No more than 8 employees can fly together on chartered flights including the crew.

Exception requests shall be forwarded to IPG Travel for review and require the Chief Risk Officer's approval.

7.10 Travel Risk Management

Travel is a vital part of our business culture as a global company with clients in all major markets. To mitigate the risks associated with business travel, travel bookings are centrally monitored and evaluated by IPG Risk Management & IPG Travel in accordance with existing policy.

For more information on the Risk Management Program please access the Risk Management page at <https://inside.interpublic.com>

7.11 Prohibited Travel

Because of the inherent risks and other considerations associated with travel to high risk or unsafe destinations, business travel may be prohibited as per the Interpublic Chief Risk Officer. To assist in this process we have partnered with a travel risk management vendor who provides intelligence and reports on global security-related issues and concerns. Travel destinations are risk rated based on intelligence related to the following criterion:

- Crime: Prevalence of petty crime, violent crime and random violence that threatens foreigners.
- Security Services: Trustworthiness and capability of local police and security services.
- Civil Unrest: Level of civil unrest, violent demonstrations, and prevalence of anti-government and/or anti-foreign sentiment.
- Terrorism: The level of terrorist activity within the country, including terrorist acts targeting domestic and international targets and state sanctioned terrorism.

- Kidnapping: Occurrence of kidnapping for ransom and political leverage within a location.
- Geopolitical Stability: Relative assessment of the political infrastructure and economic stability that affects the overall security environment

This rating process yields an aggregated risk rating which indicates the relative risk associated with a given destination. Based on continuously updated intelligence, destinations are assigned a numerical risk rating ranging from minimal (1) to very high (5). Because of the risks associated with a destination with a security rating of very high (5), employees may not be permitted to travel. In addition to security risks, there may also be economic and trade sanctions and business travel insurance considerations. Exceptions will be evaluated on a case-by-case basis and approved by the Interpublic Chief Risk Officer. A list of current restricted travel destinations is maintained on the Risk Management page on the IPG intranet. For more information please access the Risk Management page at <https://inside.interpublic.com>

7.12 Baggage

Excess baggage charges will not be reimbursed unless required for business.

Lost baggage is covered by the airline and your company card and will not be reimbursed by the company.

7.13 Helicopters

Helicopter usage is not permitted.

7.14 Lost or Stolen Airline Tickets

If in the rare instance where a paper ticket needs to be issued upon discovery of a lost or stolen ticket, the traveler must immediately report the loss to the IPG CTA, if designated, and complete a lost ticket application at the airline ticket counter. The company will not reimburse the cost of lost or stolen tickets or the associated processing fees.

7.15 Air Phones

Air phones should not be used and will NOT be reimbursed.

7.16 Other

Any savings resulting from downgrading to a restricted coach ticket (from full coach), or as a result of downgrading to any coach class airfare when an employee has the option to travel business class, is not reimbursed to the employee.

8. RAIL TICKETS

Travel by train is significantly less GHG-intensive than driving or flying. Short-haul flights are discouraged when rail is available, practical, and costs less than flying.

All rail travel must be booked through the CTA.

Rail tickets over \$75 USD or the local currency equivalent should be booked and issued by the CTA, if designated. Those under \$75 USD or the local currency equivalent single fare may not be issued by the IPG CTA, if designated, and must be purchased at the place of departure by the traveler.

8.1 Class of Service - Rail Travel

Rail travel will be in standard class only for all journeys under 2 hours.

First class/reserved seating for rail service may be utilized under the following circumstances only:

- Journeys over 2 hours in duration
- When accompanying a client
- When upgrade is at no extra cost
- If the upgrade is at the traveler's expense

8.2 Rail Travel to and from London, Paris & Brussels

Given the significant cost savings to travel by rail, vs. air, all travel to and from London, Paris & Brussels must be via EuroStar. Specific to these routes, business class will be allowed.

9. HOTELS

9.1 Interpublic Preferred Hotels

Worldwide, IPG has negotiated significant discount agreements with major hotels and hotel chains (IPG Preferred Hotels). IPG travelers are required to use the IPG Preferred Hotels for all travel arrangements. The CTA, if designated, ensures that IPG Preferred Hotels with company negotiated rates are used whenever possible. Client specific exceptions will be allowed only if there is a documented business requirement such as:

- Externally sponsored seminars in specific hotels.
- When all IPG Preferred Hotels are sold out or are not within reasonable proximity to the business event.

9.2 Reservations

- All hotel reservations must be made through the CTA, if designated, and paid for with the Corporate Card or the charges will not be reimbursed.
- Hotels must be booked within the same reservation as the employees overnight airline reservation, where applicable, to mitigate the risks associated with business travel.
- Employees should stay at an IPG Preferred Hotel in standard, single rooms with private bath only. Upgraded rooms will not be reimbursed without pre-approval by operating company CFO or its designee. Suites are not reimbursable.
- Use of a non-IPG Preferred Hotel will not be reimbursed if not approved in advance.
- Employees bringing spouses or guests will pay the difference between the single and double occupancy rate.
- Hotel bill and receipts must always be provided and all charges must be itemized on the T&E report.
- Employees must cancel hotel reservations with the CTA, if designated, in advance of their cancellation policy to avoid no-show charges. Failure to do so will result in non-reimbursement of any such charges.

For information on IPG Preferred Hotels, contact the Interpublic CTA, if designated, (or) the Corporate Travel website at <http://travel.interpublic.com>

9.3 Frequent Guest Programs

Rewards belong to the employee. Hotel booking

decisions must be made irrespective of the employee's rewards program membership. Membership fees associated with joining these programs are NOT reimbursable.

9.4 Hotel Exercise Facility/Gym

Hotel health club policy and guidelines:

- In the event that exercise facilities are not complimentary, exercise facility fees will be reimbursed up to a maximum of \$15 USD per night or local currency equivalent.
- Exercise facility fees must be itemized on the hotel bill.

9.5 Laundry and Dry Cleaning/Valet

Reasonable and necessary laundry and/or dry cleaning charges will be reimbursed when an employee travels for 3 or more consecutive nights. The charge must be incurred while traveling (not after the trip is complete).

9.6 Long-term Stay

Long term stay facilities/corporate housing, may provide a cost effective alternative to hotel accommodations. These facilities must be used for any IPG employee conducting business when traveling to the same location for 5 consecutive nights or longer in any given month (where applicable). Travelers must contact the IPG CTA, if designated, in order to set up long term stay options.

9.7 Lodging at Private Residences

Although travelers may stay at a private residence, this is not encouraged and will not be reimbursed.

If you do chose to stay at a private residence, the following guidelines apply:

- Employees cannot exchange meals or gifts for free lodging in the home of a friend or relative.
- If private residences are required for business purposes, then the reservations must be made through the CTA, if designated, or it will not be reimbursed.

9.8 Room Service

Room service is allowed but is limited to the Meal Allowance amounts. See Section 13 "Meals" for guidelines.

9.9 Hotel Telephone

Use of hotel phones is prohibited and not reimbursable unless cell phones or calling cards are not readily available alternatives.

9.10 In-Room Movies

In-room movies are permitted (limit of one per day).

10. RENTAL CAR PROCEDURES

10.1 When to Use

Rental cars should be used when they are less expensive than alternative means of transportation (e.g., taxi or car service) or where there are convenience, sustainability, or safety issues that justify the additional cost. When selecting a rental car, electric and hybrid vehicles are preferred and should comply with other aspects of this policy (e.g. vehicle class, parking considerations).

When IPG or one of its affiliated agencies is providing transportation for a large group meeting, rental cars are generally not permitted. Please refer to SP&P 119 for transportation issues related to clients or events.

10.2 Reservations

All car rental reservations must be made through the CTA, if designated, and paid for with the Corporate Credit Card, where established, or the charges will not be reimbursed.

At the time of rental, the car should be inspected and any damage found should be noted on the contract before the vehicle is accepted.

10.3 Interpublic Preferred Rental Agencies

IPG has negotiated significant discount agreements with car rental companies. IPG travelers, therefore, are required to use the IPG preferred car vendors, (IPG Car Vendors) for all travel arrangements. The CTA, if designated, ensures that IPG Car Vendors are used whenever possible. Traveler requested exceptions need to be approved in advance by IPG Travel, including client exceptions, and will be documented accordingly.

For more information on IPG Car Vendors and frequent renter programs, please contact the CTA, if designated, or IPG Travel, or the website at <http://travel.interpublic.com>

10.4 Car Class

- IPG will reimburse for car rentals up to a standard/mid size car. Exceptions will be allowed only when there is a compelling business need for a larger car (e.g. entertaining clients, carpooling, etc.).
- Upgrades are not reimbursable in any other case.
- When two or more agency people travel together and stay at the same location, reimbursement will only be made for one car.
- All other exceptions require local CFO or designee pre-approval.
- Motorcycle rentals are not permitted at any time due to insurance restrictions.

10.5 Insurance

For car rentals outside the United States (e.g., renting in Canada, EMEA/ASIAPAC) the rental rate does not include Loss Damage/Auto Physical Damage and Liability Insurance and therefore, should be accepted as a part of the rental agreement and is a reimbursable item. IPG Car Vendors, if designated, shall be used for business auto travel.

When renting vehicles in the United States, please refer to IPG SP&P 113.

Additional insurance questions should be directed to the IPG Travel or <http://travel.interpublic.com> or to the corporate Insurance page on the IPG intranet website.

10.6 Incidental Expenses

All business related tolls and parking charges that are not part of employee's regular commute are reimbursable. Tickets or fines or towing associated with parking are not reimbursable. Charges from lockouts are not reimbursable. All traffic violations are not reimbursable. Valet parking is not reimbursable if less expensive reasonable options exist.

10.7 Accidents

If you are in an accident while driving a rental car on company business, report the accident details to the local rental car company and human resources department immediately.

10.8 Returning Rental Cars

Car rentals must be returned 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

10.9 Gasoline

Employees are expected to refuel the rental car prior to returning to the rental agency and to decline the pre-paid fuel options. The cost of fuel is reimbursable.

10.10 Cancellation

Travelers are responsible for cancelling rental car reservations.

11. TAXIS, CAR SERVICE

11.1 When to Use a Taxi or Car Service

- Public transportation should be the primary choice when reasonably convenient. If public transportation is not a viable option, taxis, as opposed to private car services may be used. This includes trips to and from airports and during the course of business trips.
- Subway, rail or car service should be used when taxis are not a viable option (e.g., airport trips from the suburbs, client entertainment).

11.2 Reservations

When reserving a car service, employees must use one of the preferred vendors. For more information on preferred ground transportation vendors, please contact the CTA, if designated. In the United Kingdom, IPG has negotiated rates with local car vendors and employees are required to utilize these vendors when traveling for business.

12. PERSONAL AUTOMOBILE

IPG does not encourage employees to use personal cars for transportation on authorized company business. If an accident occurs while using your personal car on business, IPG's insurance does NOT cover the damages incurred. It is also the personal responsibility of the

owner of a vehicle being used for business to carry adequate insurance coverage for their protection, the protection of any passengers, and The Interpublic Group.

In situations where the use of a personal car is necessary when traveling on company business, the only items that will be reimbursed are mileage, parking and tolls. Mileage allowances are meant to cover the cost of gasoline and wear and tear expenses at the current local statutory mileage rate per mile/km (or) the equivalent of the current U.S. IRS authorized mileage rate per mile.

12.1 Parking

All parking for business purposes will be reimbursed. Commute related parking charges are not reimbursable.

12.2 Mileage reimbursement

Employees who receive car allowances are not eligible for mileage reimbursement. Normal commute miles do not qualify for reimbursement.

12.3 Accidents/Maintenance/Repairs/Fines

Employees will not be reimbursed for accidents, regular car maintenance, fines, penalties, towing, and repairs even if these costs result from business travel.

13. MEALS

13.1 Guidelines

Meals should demonstrate a valid business need and be reasonable for the occasion and location.

A meal is reimbursable in the following circumstances:

- A client is present.
- At least one colleague is from out-of-town.
- For confidentiality reasons, the meal must be taken offsite.
- The meal is for team building or in recognition of an event.

Attendee names are required and should be entered directly onto your expense report before submitting. Meals among Interpublic colleagues should be kept to a minimum and incurred specifically for extended business discussion.

13.2 Payment for Meals

The Corporate Card should be used for payment whenever possible. The most senior Interpublic employee attending the business meal is responsible for payment of the meal and reimbursement of the cost.

13.3 Meal Allowance While Traveling

NOTE: All standard meal amounts below are in US dollars and the local country equivalent would apply.

While traveling out of town overnight for business, employees will be reimbursed for the reasonable actual costs of their meals. In general, the meal costs should be reasonable and in line with costs that would normally be incurred on your own. For U.S. locations, the daily meal allowance guideline is up to \$125 USD per day in New York City, Chicago, Dallas, Washington DC, Atlanta, San Francisco, Los Angeles, Miami, Seattle, and Boston. The daily meal allowance guideline for all other domestic locations is up to \$100 USD per day. This includes any room service and mini-bar charges.

For international locations, the daily meal allowance guideline is up to \$150 USD per day in Tokyo, Osaka, Hong Kong, Seoul, Shanghai, Beijing, Bangkok, London, Paris, Madrid, Frankfurt, Berlin, Hamburg, Milan, Amsterdam, Brussels, Dublin, Athens, Moscow, Geneva, Copenhagen, Stockholm, Oslo, Helsinki, Basel, Zurich, and St. Petersburg. The daily meal allowance guideline for all other international locations is up to \$100 per day. This includes any room service and mini-bar charges.

13.4 Entertainment of Clients/Prospects

- Meals with two or fewer clients or prospects should be commensurate with level of employee and level of business being conducted.
- Any entertainment beyond normal business need requires approval by the local agency CFO and either WW CFO or IPG CFO.
- Occasionally, it is desirable for IPG or an affiliated agency to host an unusually expensive entertainment event or to make an unusually expensive presentation (i.e., golf outing or large group meeting). Major entertainment expenses involving large groups and/or expenditures must be pre-approved by the agency CFO and either WW CFO or IPG CFO.
- The names of all attendees and their title/company should be listed in the expense report along with the specific business topic discussed.

- In instances where entertainment involves event tickets or similar purchases, if the purchaser is not present, this will be categorized as a gift and not entertainment.

14. COMMUNICATION

Employees are responsible for assuring the security of the Interpublic network and Interpublic intellectual property accessed through mobile devices or home computers that they own.

14.1 Mobile Phone

For those employees who do not have a company issued mobile device, employees will be reimbursed for mobile phone calls made for business purposes. Reasonable personal phone charges incurred while traveling on business will be reimbursed. Mobile phone charges must be billed individually and then expensed through the T&E system. Employees are required to submit their mobile phone bills with business calls highlighted to approvers for review. IPG will reimburse \$0.06 USD per minute or local currency equivalent for domestic calls and \$0.23 USD per minute or local currency equivalent for international calls with total reimbursement not to exceed the total amount of the bill.

Employees will not be reimbursed for the purchase of cell phones or accessories unless approved by IPG GIS.

14.2 Personal Digital Assistants (PDA) and Wireless Email (e.g., Blackberry)

For those employees who do not have a company issued Blackberry or PDA and cannot access IPG Webmail over the internet, wireless email and PDA charges will be reimbursed only when there is a compelling business need. IPG will reimburse a pro-rated amount up to the maximum amount of the bill.

14.3 Home Phone/Fax Lines

If cell phones are not available, business calls must be itemized and highlighted, and receipts must be submitted for reimbursement unless it is deemed that 100% can be reimbursed based on business need and employment terms.

14.4 Other

- Air phone and rail phone are not reimbursable.
- Hotel phone usage is not reimbursable. Use mobile phone or calling card (if available) instead.
- Home internet service will not be reimbursed unless based on business need and employment terms.

Reimbursement for spousal travel will be included in the employee's Form W-2, Wage and Tax Statement to the extent required under income tax regulations.

15. MISCELLANEOUS

15.1 Non-T&E Expenses

- Items not specifically mentioned in this policy are not considered T&E expenditures.
- Any separately negotiated arrangements will be addressed on an individual basis

15.2 Examples of Reimbursable Items (when used for business purposes)

- Airfreight for business
- Currency conversion fees
- Missed appointment fees
- Postage
- Tips (reasonable and customary)
- Visa, passport, consulate fees
- Exercise facility fee up to \$15 or local currency equivalent per night

15.3 Examples of Non-Reimbursable Items

- Annual fees for personal credit cards
- Barbers / hairdressers
- Car washes
- Clothing
- Company or personal card delinquency fees
- Country club membership
- Financial planner

- In or out of hotel spa services
- Home ISP
- Luggage and briefcases
- Meals for social occasion's
- Non-business periodicals
- Optional baggage insurance
- Personal accident insurance
- Personal property insurance
- Pet care
- Shoeshine
- Subscriptions (not a T&E expense)
- Baby sitting
- Car service for normal commute
- Charitable contributions
- Company car
- Corporate mobile phones
- Golf fees (personal)
- Home fax
- Hotel or car "no-show" charges
- Membership reward fees (or) fees to reinstate rewards points
- Non-business membership fees
- Non-business postage
- Parking tickets and/or speeding tickets
- Personal entertainment (e.g. sporting events)
- Personal toiletries
- Prescription refills
- Souvenirs and personal gifts
- Vacation and personal expenses when on business trips

15.4 Tipping Guidelines

Tips are reimbursable as long as they are reasonable and customary.

15.5 Spousal/Guest Travel

Business travel is normally done alone or with other colleagues. Rarely is guest travel reimbursable. An employee of IPG or one of its operating companies must obtain the prior approval of his/her company's Chief Executive Officer (CEO) or Chief Financial Officer (CFO) for a spouse to accompany the employee on a trip at company expense.

Prior approval for spousal travel for CEO's or CFO's of operating companies must be obtained from the next highest ranking regional or worldwide CEO or CFO. Prior approval for spousal travel for an operating company's worldwide CEO or CFO must be obtained from the CEO or CFO of IPG.

Reimbursement for spousal travel will then be allowed to the extent required under local statutory regulations.

- **Tax Authority Requirements:** Failure to comply with instructions relating to the reporting and approval of sundry and travel expenses, including entertainment, may result in a claim by the tax authorities that all or part of the reimbursed expense is taxable compensation.

Tax authority requirements, governing the classification of sundry and travel expenses, including entertainment costs as tax-deductible business expenses for either the employee and/or the company, necessitate the inclusion of expense receipts and full details (i.e., the amount, time and place the expense was incurred, the business purpose and nature of the business relationships to the person(s) entertained). This information must be provided for all entertainment claimed via expenses.

Where the entertainment takes place at a cultural or sporting event, in addition to the information noted above, details of the location of the meeting, description of the event, its duration, the individuals present and the nature of the business discussed should be provided. If any employee is present, who is not attending for a specific business purpose this must be clearly indicated.

16. KEY CONTACTS

- IPG Travel: <http://travel.interpublic.com>

17. DEFINITIONS

- **Direct Bill versus Employee Reimbursement:** In order to ensure that vendor invoices for services rendered to individual employees are actually incurred and the charges are reasonable, payment should be made directly by the employee on the IPG issued corporate card (Corporate Card), if available, and submitted on the individual's expense report for reimbursement whenever possible. Examples include hotels, car service, mobile phones, travel, etc.

Direct billing by vendors to IPG agencies for individual employee services is discouraged and requires advanced approval of the local office CFO or General Manager/Finance Director. Charges incurred on behalf of a group (i.e. catering services, rental of event venues, etc.) where an account can be established and the proper review of charges are in place are appropriate.

Specific operating companies may, at their discretion, impose greater control than required by this policy but never less. Such modifications to this policy require the approval of the Chief Risk Officer.