

Travel & Entertainment Policy

U.S. and Canada



Interpublic Group of Companies Last Revised: January 2023

This policy applies to all Interpublic Group of Companies (IPG) agency offices and its employees, including IPG subsidiaries. The expense policy guidelines are effective for all U.S. & Canada based IPG employees and defines 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 noncompliant 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 domestic offices and subsidiaries of Interpublic.

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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 plugin 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- & 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 nonbillable expenses. If the IPG policy is more restrictive than the client policy, the employee should follow the IPG policy.

All other provisions of this policy remain in effect.

4.2 Billable & 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 agency CFO.

4.5 Receipt Requirements

Original receipts for all expenditures greater than or equal to \$75.00 are required to qualify for reimbursement. If client billing and receipt requirements are more restrictive than the foregoing, the client's receipt requirement will take precedence over the IPG requirement. Local agency management may also have a more restrictive receipt requirement, if they so desire.

Photocopies of receipts and credit card statements are not considered acceptable documentation for receipts.

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

The employee's immediate supervisor or the next higher authority must approve all expense reports. No employee is authorized to approve their own, a peer's, or a superior's travel expense report. All CEOs that report to the office of the Chairman must submit their expense report to the IPG Chief Risk Officer (CRO) for approval. Each employee expense report should be reviewed by the Department Head and Senior Finance person for:

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

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 late penalty fees 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 VAT Reclaim

All VAT (Value Added Tax and GST) will be reimbursed to the employee. VAT is reclaimed at the corporate level.

5. Corporate Cards

5.1 Eligibility

All employees who must 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, which begin to accrue at 30 days past due. 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 Coporate 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 is either not accepted or, if you are a new or existing employee and have not yet applied for an individual Corporate Card, the designated CTA will obtain permission to charge Air/Rail reservations to your company's central bill account (contact your local finance department for details on how to expense these charge types).

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

5.3 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. An end user should expect payment to be received within 5 business days of an expense report's extract date.

5.4 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 can be affected if the Corporate Card is delinquent or canceled by the Corporate Card company.

5.5 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.

5.6 Corporate Meeting or Events 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 nonapproved 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 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.

5.8 AMEX Online

American Express allows you to view your AMEX Corporate Card Account Online once you have registered your account number. You must register at the following URL: http://www.americanexpress.com/myca.

5.9 Corporate Credit Card & Traveler Benefits

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

5.10 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 go to http://travel.interpublic.com.

6. Booking Reservations

6.1 Travel Agency

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 IPG Travel 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.

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 less than half those of the telephonic reservation; and less than a quarter of the after-hour telephonic reservation fees.s.

6.3 TravelSource ProFILER

Employees, who travel for business, including assistants who will be booking travel on their behalf, are required to create an active TravelSource profile. TravelSource ProFILER allows travelers and their assistants the ability to create and maintain their own individual profiles in a password-protected environment 24/7. Maintaining accurate profiles is the key to traveler satisfaction and any new or updated information will be immediately synchronized to the Corporate on-line booking tool (TravelSource Direct). To access TravelSource Profiler, please go to: https://travel.interpublic.com.

To access profile tool: https://direct.interpublic.com/.

6.4 Preferred Suppliers

IPG has negotiated significant discount agreements with major airlines, hotels, and car rental companies, (Please refer to http://travel.interpublic.com). IPG travelers, IPG Travel and Entertainment Policy (U.S. and Canada) - October 2021 — P 7 therefore, are required to use the IPG preferred vendors for all travel arrangements. The CTA ensures that preferred vendors with company-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.

6.5 Reservation Timing

Travel planning should be completed as far in advance as possible. Advance travel planning is key to obtaining the lowest airfares and securing first choice flight times and room accommodations. As it is not unusual for plans to change, your CTA 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 be purchased sooner, the reservations will be ticketed in accordance with the airfare booking requirements.

6.6 Frequent Flyer/Guest/ Reward Points

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

Employees can keep all rewards related to travel (e.g., Company Card Reward Points, Delta Sky Miles, Hilton HHonors). Enrollment fees for these programs are a personal expense and are not reimbursable.

6.7 Itinerary Changes

Should your plans change and necessitate a change in flight, hotel, or car reservation, contact the CTA immediately. Fees associated with changes, provided there is a business reason, will be reimbursed.

6.8 Meetings & 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 Travel designated meeting planner (Meeting Planner).

It is against the IPG policy for a contract to be signed by any IPG employee for Events without obtaining prior review and approval by the IPG Meeting Planner and the Vice President of IPG Travel. Exceptions to this policy must be approved in advance by 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 IPG Meeting Planner will arrange for payment to be made via an approved agency meeting credit card, or through accounts payable where applicable.

7. Air Travel

7.1 Booking/Fares & Ticket Types

- 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
- 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.
- With prior local business unit approval, and after your coach airline ticket has been ticketed through the designated CTA, employees are permitted to purchase and expense extra leg room seating directly through the airline website for flights of more than 5 hours in duration.
- Interpublic requires the use of electronic tickets (e-tickets) to avoid fees for paper tickets. Paper tickets will only be issued if the airline does not offer e-ticket capability. The CTA will issue a full receipt package with all tickets.
- Non-refundable fares should be booked whenever appropriate. Non-refundable tickets 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. IPG Travel and Entertainment Policy (U.S. and Canada) - October 2021 – P 8
- Where a valid business reason exists, there may be exceptions for declining the lowest fare recommended by the CTA.

- A business justification will be required prior to the ticket being issued and must be approved by the local finance administrator.
- Every effort should be made to make reservations at least 14 days in advance, whenever possible.

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 noncommercial 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 ensures that preferred airlines with company negotiated rates are used whenever practicable. The CTA 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 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 will be escalated to the IPG Travel Services Dept. for review. Out of class exceptions should be granted for compelling business reasons and must have the approval of:

- The local agency CFO or CEO; (ii) Regional or Worldwide CFO, CEO or their designee; and
- The IPG Vice President of Global Travel Services and the IPG CFO or Senior Vice President, Corporate Services.

On 2-class planes (i.e., trip qualifies for business class but business class is not offered), Travel Services will determine whether the front cabin qualifies as 1st or business class. If airline coding qualifies the front cabin as business class, then the front cabin may be flown.

7.6 Unused & Non-refundable tickets

Employees are responsible for informing the CTA as soon as it is known that a trip needs to be cancelled. If your electronic airline ticket has already been issued, the CTA will cancel the trip in its entirety and refund the ticket that was charged to your corporate card. Unused paper tickets must be returned to the IPG designated Corporate Travel Agency within 5 days of cancellation. Unused paper tickets must not be sent to the airlines Coach Class All domestic (U.S.), including Caribbean, Canada, and Mexico destinations. Business Class All other international destinations, Hawaii and Alaska (intra- Continental flights are in coach unless through fares apply). IPG Travel and Entertainment Policy (U.S. and Canada) - October 2021 — P 9 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 call or write the credit card company and explain that this charge is in dispute due to an outstanding credit not yet applied.

In a case where the airline ticket is a non-refundable ticket, a credit will be placed in your traveler profile (TravelSource Direct) so that the amount of the nonrefundable ticket can be reused for a future business trip (a credit will only apply if the flight is cancelled in advance of the actual departure time/ flight). The CTA has an automated process to apply these tickets for future trips. All non-refundable tickets must be cancelled in advance of the trip so that a credit can be applied. It is IPG's policy that employees must immediately reuse all nonrefundable tickets, where it is possible for any/ all future business trips and will automatically be applied to future online bookings where applicable. Travel must commence within one year of original ticket issue date. The CTA will alert the IPG Travel Services Department of any employee refusing to reuse a non-refundable ticket.

7.7 Upgrades

Costs associated with upgraded airfares 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 securityrelated 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 antigovernment 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 designated Corporate Travel Agency, 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.

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 domestic Amtrak tickets should be booked through the CTA. Employees are eligible to travel in coach class.

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

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 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 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. 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 in advance of their cancellation policy to avoid noshow charges. Failure to do so will result in non-reimbursement of any such charges.

For information on IPG Preferred Hotels, go to 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..

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 per night.
- Exercise facility fees must be itemized on the hotel bill.

9.5 Laundry and Dry Cleaning

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 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 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 Interpublic 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 and paid for with the individual corporate credit card or the charges will not be reimbursed.

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 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 go to http://travel.interpublic.com.

10.4 Car Class

- IPG will reimburse for car rentals up to a standard/ mid size car. Exceptions will be made 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.
- All other exceptions require local CFO or designee preapproval.
- Motorcycle rentals are not permitted at any time due to insurance restrictions.

10.5 Insurance

When renting a car for business purposes in the United States, Loss Damage/Auto Physical Damage and Liability Insurance is a component of the rental rate and employees should decline all optional insurance that is offered by the IPG Car Vendor. The use of the IPG Car Vendor affords lower auto rental rates and eliminates any insurance deductibles IPG would otherwise be liable for. If a non-IPG car vendor must be used (e.g., no availability from an IPG Car Vendor), employees should still decline any optional insurances as coverage is provided via IPG's auto insurance program. The use of a non-IPG preferred car vendor on an elective basis will, however, subject the business unit to a deductible for any physical damage caused to the rented auto.

Employees may enjoy the discount benefits offered by the IPG Car Vendors if renting vehicles in the United States for personal use. Please note, however, that the Loss Damage/Auto Physical Damage and Liability Insurance is NOT included in the rental rate nor is any coverage provided by IPG's auto insurance program in such instances.

When renting vehicles outside of the United States, including Canada, please refer to SP&P 117.

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

10.6 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

10.7 Gasoline

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

10.8 Incidental Expenses

All business-related tolls and parking charges that are not part of employee's regular commute are reimbursable. Tickets or fines 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...

10.9 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.

10.10 Cancellation

Travelers are responsible for canceling rental car reservations

11. Taxis, Car Service

11.1 When to Use a Taxi or Car Service

As a general rule, 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.

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 and reservation must be booked through the CTA. For more information on preferred ground transportation vendors, please go to http://travel.interpublic.com. In the United Kingdom, IPG has negotiated rates with local car vendors and employees are required to utilize these vendors when traveling for business.

11.3 Working After Hours

If an employee leaves the office after 8:00 PM, he/she may take a taxi cab or car service home and submit a receipt for approval and reimbursement. Use of a car service/taxi must be approved by the employee's supervisor prior to incurring the cost.

11.4 Payment

When possible, charges for taxi's and car service should be paid by the Corporate Card (including tip).

12. Personal Automobile

12.1 Acceptable Usage

Employees may use their personal cars and be reimbursed when traveling on company business. Normal commute does not qualify for reimbursement. Note that mileage allowances are meant to cover the cost of gasoline and wear and tear expenses, and that these expenses will not be reimbursed separately. The only items that will be reimbursed are mileage, parking and tolls.

12.2 Mileage Reimbursement

If a personal automobile is used for business purposes, you will be reimbursed at the current IRS authorized mileage rate per mile, which includes gas. This rate is maintained in the Concur or SAP Expense system and is also posted on the IPG Intranet.

12.3 Tolls

All tolls incurred while traveling for business are reimbursable.

12.4 Parking

All parking for business purposes will be reimbursed and must be charged to your Corporate Card.

Commute-related parking charges are not reimbursable.

12.5 Accidents/Maintenance/ Repairs/Fines

Accidents, regular car maintenance, fines, penalties, towing, and repairs are not reimbursable.

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 into Concur or SAP Expense.

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 Working Late and Weekends and Holidays (Headquarters & Office-Based Staff)

If an employee is required to work onsite past 8:00 PM on the weekdays and has been at work for more than 10 hours, a meal will be reimbursed at actual expenses up to \$25 (including tax, tip, and delivery charges).

Employees who are required to work at the office on the weekends or holidays for more than 6 hours will be reimbursed for 1 meal at actual expenses up to \$25 (including tax, tip, and delivery charges). Employees who are required to work at the office on the weekends or holidays for more than 10 hours will be reimbursed for 2 meals at actual expenses up to \$25 for each meal (including tax, tip, and delivery charges).

If a meal is provided by the team while working late, working on weekends, or working on holidays, the employee will not be offered additional meal reimbursement.

13.4 Meal Allowance While Traveling

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 domestic locations, the daily meal allowance guideline is up to \$125 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 per day. This includes any room service and mini-bar charges.

For international locations, the daily meal allowance guideline is up to \$150 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.

13.5 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) & Wireless Email (e.g., Blackberry)

For those employees who do not have a company issued mobile device 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 prorated 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 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.

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
- · Home office expenses with approval
- · Missed appointment fees
- Postage
- Professional and/or trade group memberships
- Telegrams / telex
- Tips (reasonable and customary)
- · Visa, passport, consulate fees
- In-room movie (one per day)
- Exercise facility fee up to \$15 per night
- Checked Baggage Fees

15.3 Examples of Non-Reimbursable Items

Exceptions to this list will require local agency CFO and/ or IPG Travel Services Group approval.

- · 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 within the following guidelines:

- Skycap: \$2 per bag
- Porters/bell person, etc.: \$2 per bag upon check-in/check-out
- Maid service: up to \$2 per day
- Meals: 15% 20% (if not included in the charge). If you pay with your company card, the tip should also be placed on your company card and not paid in cash.
- Car Service: Tip is included in the negotiated rate.
- Specialty event tips: Aummarize how funds are used and department head approval must be documented.

15.5 Spousal/Guest Travel

Business travel is normally done alone or with other colleagues. Rarely is guest travel reimbursable.

An employee of Interpublic 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 Interpublic.

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.

16. Key Contacts

- IPG Travel Services Department: http://travel.interpublic.com.
- Concur Expense and Reporting: https://www.concursolutions.com.
- Concur Expense Questions: esd@interpublic.com.
- IPG TravelSource Direct: https://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) and submitted on the individual's expense report for reimbursement whenever possible. Examples include 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. 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.