

NTT Training

Travel and Business Expense Reimbursement Policy

NTT Training (“NTT”) will reimburse employees for reasonable travel and business expenses incurred during the course of their employment with NTT subject to the guidelines, approvals and procedures described in this policy. The specific types of expenses that may be reimbursed and the procedures for requesting reimbursement are detailed in the following sections:

- Section 1- Business Travel Expenses
- Section 2- Miscellaneous Business Expenses
- Section 3- Expense Reimbursement Requests and Procedures
- Section 4- Expense Reimbursement Payments
- Section 5- IRS “Accountable Plan”

It is expected that NTT employees will exercise appropriate care in incurring travel and business expenses. NTT employees must obtain approval from the President, National Sales Director or Operations Manager **before** incurring travel and/or business expenses.

Section 1- Business Travel Expenses

Employees must use SAP Concur to book air travel, rental cars and lodging.¹ NTT reserves the right to deny an employee’s expense reimbursement request for air travel, rental car and lodging expenses not properly booked through SAP Concur. Expense reimbursement requests that are not approved become the responsibility of the employee.

Air Transportation

Employees must travel on coach (business class permitted for international flights with pre-approval from the President) airfare available, considering airports, arrival and departure times, connection times and other restrictions including cancellation and change fees.²

The following criteria will be used to determine lowest available airfare:

- The flight’s departure or arrival time should be within 90 minutes before or after the employee’s requested departure or arrival time.
- One-stop or connecting flights may be required if savings of \$200 or more can be achieved.
- Non-refundable tickets may result in substantial savings and should be issued where available and where risk of changing or cancelling the trip is not high.
- Discount consolidator fares are often available for last-minute travel and must be used where available.
- To take advantage of discount fares, air reservations should be booked and ticketed not less than 14 days prior to the planned departure date. Air reservations booked and ticketed within seven days from planned departure date resulting in higher cost of airfare are required to have purchase approval from the President. Avoid costly, short-notice trips.

Baggage Fees

Airline charges for checked baggage are reimbursable. NTT will not reimburse for gratuities for baggage handling.³

¹ Exceptions may be made if an employee is able to find a significantly less expensive flight or hotel stay outside of SAP Concur, with pre-approval from the President, National Sales Director or Operations Manager.

² Exceptions will be made for employees with approved travel accommodations under the Americans with Disabilities Act (“ADA”).

³ Exceptions will be made for employees with approved accommodations under the Americans with Disabilities Act (“ADA”) related to lifting or carrying.

Early Bird Check-in Fees- Southwest

Early Bird check-in Fees on Southwest are reimbursable.

Changes and Cancellations

NTT is not required to but may, in its reasonable discretion, reimburse employees for penalties and other charges incurred for flight cancellations or changes, taking specific circumstances into consideration.

In-flight Internet

In-flight Internet fees are reimbursable when access is required for NTT business needs.

Non-reimbursable Air Transportation Expenses

NTT generally will not reimburse employees for airline seat selection fees,⁴ in-flight movies or other personal entertainment expenses, airport or airline clubs, lounges or memberships.

Personal Vehicles

If an employee is required and has obtained prior approval to use their personal vehicle for business purposes, they will be reimbursed at the mileage rate set by NTT's travel policy in lieu of actual expenses for gasoline, oil, repairs, insurance, etc.⁵ Employees will generally be reimbursed for mileage that exceeds their normal daily commute from home to primary office or 10 miles, whichever is greater. However, NTT, in its sole discretion, may deny de minimis mileage reimbursement requests.

Expense reimbursement relating to the business use of an employee's personal vehicle must utilize SAP Concur's map/mileage calculator. No other form of documentation will be accepted. The following items are also required in SAP Concur:

- Date of trip.
- Business purpose

Tolls and parking costs are reimbursable. However, NTT will not reimburse employees for expenses such as parking tickets, vehicle repairs and maintenance, fines for moving violations and vehicle towing charges.

Employees using a personal vehicle for business purposes must ensure that their automobile insurance covers business travel. NTT will not reimburse employees for automobile insurance costs.

Rental Cars

If an employee is required and has obtained prior approval to use a rental car for business purposes, NTT will reimburse employees for the reasonable cost of the rental car, gasoline, tolls and parking.

Employees must reserve an economy or standard-sized vehicle through SAP Concur using a vendor with whom NTT has a negotiated preferred rate agreement. Failure to use SAP Concur or a preferred vendor may result in the request for reimbursement being denied.⁶ Expense reimbursement requests that are not approved become the responsibility of the employee.

NTT's insurance will cover both the employee and the vehicle when a vehicle is rented for business purposes. Accordingly, employees should not purchase additional insurance coverage from the rental car company and will not be reimbursed for purchasing rental insurance coverage

Ground Transportation

Employees will be reimbursed for ordinary and reasonably priced ground transportation, including buses, shuttles, taxis, Uber/Lyft (and other car services) to and from airports or railroad stations and between the

⁴ Exceptions will be made for employees with approved travel accommodations under the Americans with Disabilities Act ("ADA") and for employees traveling on Southwest.

⁵ NTT follows the IRS Privately Owned Vehicles mileage reimbursement rate (POV).

⁶ Employees may use their personal loyalty program rates or client program rates to rent a vehicle, as long as the total rate does not exceed the NTT preferred vendor rate agreement and with **prior** approval from the President, National Sales Director or Operations Manager

employee's hotel and business/training locations. Employees must choose the least expensive method of transportation that reasonably meets the employee's scheduling and business/clients' needs.

Rail Transportation

Employees may use rail travel when it is less costly than air travel. Employees are expected to choose the lowest, most reasonable fare available, considering arrival and departure times, connection times, and other restrictions, including cancellation and change fees. Reimbursement of penalties and other charges for cancellations or changes is governed by the rules applicable to air transportation, as described above.

Hotels and Lodging

NTT will reimburse employees for the cost of standard accommodations in a reasonably priced hotel for overnight stays during business trips. Hotel reservations must be booked through SAP Concur⁷ and should be made in such a manner as to secure the best available rate. Accordingly, if given the option and it reasonably meets the employee's scheduling and business needs, employees should select hotels with which NTT direct bills.

Employees seeking reimbursement for lodging expenses made outside of SAP Concur must submit for reimbursement in SAP Concur and provide an itemized hotel receipt or statement which indicates full payment has been made and contains:

- Name and location of the hotel or other lodging.
- Dates of the employee's stay.
- Separately stated charges for lodging, meals, telephone and other expenses.

Cancellation Fee

NTT is not required to but may, in its reasonable discretion, reimburse employees for penalties and other charges incurred for room cancellations or changes, taking specific circumstances into consideration.

Laundry and Valet

NTT will not reimburse employees for laundry and valet services, except for domestic travel lasting seven consecutive days or longer, in which case NTT will reimburse reasonable laundry and valet expenses. Employees should choose the least costly laundry and valet services that reasonably meet the employee's scheduling and business needs.

Internet Fees

Internet fees are reimbursable when access is required for NTT business needs.

Movies and Personal Entertainment

NTT will not reimburse employees for hotel movies or other personal entertainment expenses.

Incidentals

NTT will not reimburse employees for gratuities for porters, housekeeping and hotel other staff.⁸

Meals While Traveling

NTT will reimburse employees **up to** the General Service Administration ("GSA") daily limit⁹ while on overnight travel or when an employee is away from their normal work location.

GSA publishes Continental US (CONUS) tables for each local or metropolitan area annually on October 1 (<http://www.gsa.gov/portal/content/104877>). The daily GSA limit includes all meals, gratuities and

⁷ Exceptions may be made with approval from President, National Sales Director or Operations Manager. Exceptions may include locations not served by SAP Concur hotel selection.

⁸ Exceptions will be made for employees with approved accommodations under the Americans with Disabilities Act ("ADA") related to lifting or carrying.

⁹ Refer to the GSA website for daily rates <http://www.gsa.gov/portal/content/104877>.

incidental expenses. The GSA daily limit is prorated for partial days of travel away from home according to the GSA guidelines. All requests for reimbursement must be documented via receipt.¹⁰

Accompanying Spouse/Child/Children

NTT will not reimburse employees for any expenses relating to a spouse, child/children or other companion that might accompany the employee on travel.

Loyalty Points/Discounts

Employees have the ability to set up their individual profile in SAP Concur in order to take advantage of their personal loyalty programs or discounts (military, government, etc.)

Section 2- Miscellaneous Business Expenses

All requests for reimbursement, along with appropriate supporting documentation, must be submitted through SAP Concur **within 30 days** of incurring the expense(s).

Conferences and Professional Development

NTT will reimburse employees for the cost of attending professional development and/or continuing education programs approved in advance by the President, National Sales Director, or Operations Manager, including travel costs and registration fees, provided the content of the program is of a substantive nature that relates directly to the employee's current job responsibilities. Approved conference registration fees and other similar expenses should be paid directly in advance of the event by NTT, but may be reimbursed afterwards if prior payment by NTT is not possible.

Passports and Visas

NTT generally will not reimburse employees for U.S. passport costs and fees. However, if an employee is traveling for NTT business purposes, and does not have a passport, or has an expired passport, NTT will reimburse any required fees to expedite the application/renewal process. NTT will reimburse for Visas issued by a foreign country if the employee is required to travel to that country for business purposes.

Miscellaneous

NTT will reimburse of Personal Protective Equipment (PPE) as needed. NTT Training will not reimburse employees for ATM and other bank fees, or for check cashing charges.

Section 3- Expense Reimbursement Requests and Procedures

NTT employees must obtain *advance approval* from the President, National Sales Director or Operations Manager of all travel and business expenses. NTT, in its sole discretion, may deny any expense that was not approved in advance, booked in SAP Concur (when applicable), submitted through SAP Concur and/or deemed by NTT, in its sole discretion, to be unreasonable relative to the circumstances. Expense reimbursement requests that are denied will become the employee's responsibility.

Submitting for Expense Reimbursement

Employees must submit reimbursement requests through SAP Concur **within 30 days** of incurring the expense.

Air travel, rental cars and lodging booked through SAP Concur is purchased using the NTT credit card and will not need to be submitted for reimbursement.¹¹

Appropriate Supporting Documentation

Expenses submitted through SAP Concur must be accompanied by original receipts or other appropriate supporting documentation for each expense showing:

¹⁰ Receipts or other supporting documentation are not required for expenses under \$5.00.

¹¹ Employees wishing to register their own credit card in SAP Concur can use it to purchase air travel, rental cars or lodging may do so, but will then have to submit for reimbursement in SAP Concur.

- Amount paid.
- Date expense was incurred and paid.
- Nature of the expense/business purpose.
- Vendor or provider name and location.

If a receipt or other supporting documentation is not available, the employee must submit a written explanation of why the documentation cannot be provided.¹⁰ NTT Training, in its sole discretion, will evaluate the explanation and determine whether the expense is reimbursable.

Section 4- Expense Reimbursement Payments

The President, National Sales Director or Operations Manager will review expense reimbursement requests that are submitted, verify that expenses are permissible under this policy, and that supporting documentation is appropriate. NTT reserves the right to deny any expense reimbursement request that is inaccurate, does not include the appropriate supporting documentation, is submitted late, or otherwise fails to fully comply with NTT's policy, as determined by NTT in its sole discretion. Expense reimbursement requests are subject to audit by NTT.

Expense reimbursements will follow the payroll schedule. Expense reimbursement requests submitted and **final approved by the payroll cutoff dates, 13th and 28th** of each month will be paid on the **20th and 5th**, respectively. Reimbursements will be deposited, or checks will be processed, in accordance with the bank account information provided in UltiPro.

Administration of This Policy

NTT is responsible for the administration of this Travel and Business Expense Reimbursement Policy. Abuse of this policy, including falsifying expenses to reflect costs not incurred by the employee, may be grounds for disciplinary action up to and including termination of employment.

Any questions about SAP Concur, or submitting expenses through SAP Concur, should be directed to the Accounting Department.

Section 5- IRS Accountable Plan

NTT's Travel and Business Expense Reimbursement Policy follows the requirements of the Internal Revenue Service Code Section on Accountable Plans. This means that if an employee is reimbursed for expenses under this policy, the reimbursement will not appear as income on an employee's Form W-2 provided the following requirements are met:

Business Connection/Substantiation

Expenses submitted through SAP Concur must be reasonable and appropriate as noted above, and accompanied by original receipts or other appropriate supporting documentation for each expense to include:

- Amount paid.
- Date expense was incurred and paid.
- Nature of the expense/business purpose.
- Vendor or provider name and location.

Return of Excess Reimbursement

If an employee receives an excess reimbursement, the employee must report and return any excess amount to NTT's Accounting Department within 30 days of receipt. Excess reimbursements that are not returned within 30 days are considered income subject to withholding and must be reported on the W2.