



Travel Policy and Procedures

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DWT.COM

The data set forth in this document are not to be disclosed by the recipient or any of its employees to any third party.

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OBJECTIVES

Our firm's travel policy strives to strike the appropriate balance among the following goals:

To ensure our travel policies and tools support our people in performing at their best while traveling on business

To mitigate the impact of travel on our people and support them in integrating and managing their work and personal lives

To ensure that our travel policies are appropriately relative to the standards of our clients

Thank you for your commitment to further our business through your thoughtful and ethical use of law firm resources when traveling in support of law firm-related business.

GENERAL TRAVEL INFORMATION

Introduction

Our *Travel Policy and Procedures* enable you to contribute to our success by making sure we get the best return on the travel dollars we spend. Please know that our travelers' safety is our number one priority.

While we recognize the need to travel to grow our business and serve our clients, we must ensure that our travel dollars are managed in compliance with the firm's travel policy and best practices.

Travel on behalf of DWT must be consistent with the needs of our business. The firm will reimburse you for expenses actually incurred. Our intent is that you should neither lose nor gain financially as a result of business travel; however, some items of a personal nature may not be reimbursable.

We ask you to do the following:

- Conduct our business with integrity, in compliance with applicable laws, and in a manner that excludes consideration of personal gain
- Exercise good judgment and travel in a cost-efficient manner
- Exercise good health and safety judgment when traveling
- Safeguard client and firm information and assets while traveling and avoid compromising that security
- Ensure travel expenses are appropriate and consistent with business needs
- Consider the use of teleconferencing or videoconferencing to minimize travel costs and maximize travel effectiveness
- Adhere to the policies and procedures set forth here
- Complete and update when needed your personal travel profile
- Review and confirm reservations to make certain they are correct at the time of booking
- Be vigilant when you travel and check to make certain that our travel partners are giving you the rates we have negotiated
- Accurately document expense reports with appropriate receipts and submit them in a timely manner consistent with expense reporting guidelines

If you are traveling on client business and the client's travel policies and procedures conflict with our policies and procedures, then the client's travel policies and procedures supersede the firm's travel policy so long as the expenses are billed to the client.

If you do not follow our travel policy and procedures, you will be liable for any extra expense incurred.

Employee Travel Arrangements

You must arrange all travel (airfare, lodging and ground transportation) through the firm's travel management provider, Ultramar Travel, or by using the new online booking tool – Concur Travel.

By booking through Ultramar, we ensure that the arrangements are made in compliance with our policies, that volume discounts are leveraged and that we receive location information to support employees in the event of a travel disruption. We review all expenses to ensure compliance with our policies and procedures. Ultramar recognizes you as a valued customer and will help ensure your travel experience meets your business needs.

You must use the law firm's preferred airlines, hotels and vehicle rental options offered by Ultramar provided that they meet your business needs. The use of preferred suppliers enables our firm to leverage volume purchases in contract negotiations. The results include favorable contracts and benefits for the firm.

When you book through Ultramar, you will receive confirmation of your travel plans. Please immediately review your confirmation to make certain it is accurate.

Visas and Passports

If you are traveling internationally, you should check that your passport is current and you should obtain any visa necessary prior to your scheduled departure date. Expenses associated with obtaining a business visa for business travel for the firm are reimbursable.

If you require a business visa or a passport renewal, contact Ultramar who can assist and expedite the process. You should not rely on nongovernment websites for visa and passport information and you should not use non-contracted vendors to assist in the application process.

Travel Security

We are able to keep track of your travel plans should an emergency arise when you book through our travel company, Ultramar. This allows security measures to be coordinated. In the event security measures are deemed necessary and time is not available to arrange the proper level of support, your travel may need to be postponed until the necessary security measures can be coordinated. Your safety and security are the highest priority.

When traveling, we recommend that you have a heightened sense of safety and awareness. If emergencies arise and you feel your safety may be threatened, seek immediate assistance from local services or authorities.

When you travel internationally, carry any medicines you need in your carry-on luggage. Keep medicines in their original, labeled containers to make the customs process easier.

Air Mileage Programs

Payment for air fare may be charged to the traveler's personal card or DWT's credit card.

Managing your air miles accounts is your responsibility. Airline miles earned while traveling on firm business are yours to use.

Frequent flyer miles or benefits are not reimbursable by the firm, even if they are used on firm business.

Frequent flyer upgrades can be facilitated by Ultramar only when the airlines allow for this process to be automated within the reservation system. Any associated costs are at your expense.

Reservations

In order to optimize cost savings for the firm, travel arrangements should be made seven (7) or more days in advance of domestic travel and fourteen (14) or more days in advance of international travel. Travel itineraries are based on, and in order of, non-stop routes, the firm's preferred carriers, lowest possible fare available at time of booking, flights available two (2) hours before and two (2) hours after the requested flight time, and flights that result in a savings of \$300 or more.

Preferred Airline Partners

Currently, the firm's preferred domestic airline partners are Alaska, Delta and United.

Domestic and International Flights

When in doubt, you should accept the lowest logical airfare consistent with business needs.

Coach Class: Nonrefundable Coach class is the booking class for all domestic and international flights.

Personal Upgrades: Personal miles or coupons can be used to upgrade to first class, or you may opt to pay personally for the price difference between coach and first class. Travelers who wish to fly in business/first class on domestic or international flights will be charged the difference between economy plus and first class to their personal credit card.

Nonrefundable Tickets: Non-refundable tickets are actually re-usable and should be considered for any itinerary that is not highly likely to change. The savings are usually significant, but the cost of rebooking and cancellation charges should be factored in when considering use of this type of ticket. The change fees on most airlines have risen significantly in recent years.

Charter Flights

Charter flights are not approved and are to be considered only under exceptional circumstances, such as when security risks or the absence of commercial flights make commercial travel nonviable. Charter air requires the prior approval of the Managing Partner.

Private Aircraft

Travel only commercial or approved charter airlines.

Cancellation Policy

Airline cancellations should be made as soon as a change arises in travel plans so that a refund or credit may be issued. Any avoidable fees resulting from failure to meet cancellation requirements may be charged to the traveler.

Denied Boarding Compensation

Airlines sometimes compensate passengers who are denied boarding when they have confirmed reservations. You may keep the payment (including any separate living or meal allowance) when you are bumped as consideration for the inconvenience.

GROUND TRANSPORTATION

Light Rail, Shuttle Services, Uber and Taxi

The most cost-effective, safe and efficient ground transportation is to be used. Uber is an application that expedites discount car service in major cities. The tip is included in fares charged by Uber.

Rental Car

When it is necessary to rent a vehicle, the cost of rental plus tolls, fuel and parking is reimbursable. In general, an intermediate or smaller car is the car type within policy; however, the size and type of the rental car should be appropriate for the number of people in the car and the road conditions on which it will be used. Hybrid rentals are allowed. In-car navigation systems and electronic toll payment options for rental cars are considered reimbursable. All other convenience options, e.g., satellite radio are considered non-reimbursable.

When renting cars in the United States, you should not purchase rental car insurance as the firm maintains rental car coverage. When renting a car internationally, you should purchase insurance at the time of the rental. In the event of an accident, please immediately contact Ultramar and DWT's travel manager. A written report must be sent to the Human Resources Director (for insurance purposes) within twenty four (24) hours of the accident and a copy of any police report should be forwarded as soon as it is available. The Human Resources Director should be notified immediately if a DWT attorney or staff member is injured so that proper workers' compensation forms can be filed in a timely manner. To maximize cost savings, you should refuel rental cars prior to returning them.

You should cancel any guaranteed rental car reservations as least two hours prior to scheduled car pick up to avoid "no show" charges.

Rail

Standard class of rail is preferred. Business class and high speed, express business class rail, e.g., Acela, may be reserved for rail travel when more flexibility is necessary.

Personal Vehicle on Firm Business

If a personal vehicle is used for firm business, you may be reimbursed for mileage plus any tolls and parking. If you are using a personal vehicle, then you must provide at least the minimum insurance coverage as required by state law. Reimbursement for the use of your own vehicle is calculated using a rate per mile that covers fuel, oil, repairs, tires, maintenance, insurance and depreciation. Therefore, expenses of this nature are only reimbursable as part of the per mile rate. The firm uses the current IRS per mile rate which is automatically entered into the expense reimbursement system.

LODGING

Contracted Hotels

In cities where the firm has negotiated contract rates with specific hotels, DWT will book a room at a contracted hotel. DWT has options in those cities where the firm has offices. In cities where there is more than one contracted hotel, the employee may choose among contracted hotels. A list of DWT's 2017 Preferred Hotels appears on the travel portal page. When travel schedules require early hotel check in and additional hotel charges are incurred, the additional charges are considered reimbursable.

Hotel Rooms

Standard rooms are reimbursable. The additional cost of a suite or club floor room is not.

Conference Rates

Ultramar does not have access to the reserved block of rooms for a conference. You should book your own conference hotel room as part of the conference registration process. If the conference rate is higher than the maximum lodging rate listed, you must submit evidence of the conference rate with their receipts for reimbursement.

No Show

Hotel "no show" bills are not reimbursable unless there was a specific reason why timely cancellation was not possible. Exceptions to this policy require Practice Group Chair or Office Administrator approval. Review in advance what the specific cancellation policy is for your particular hotel.

Meals

Since meal expenses vary considerably by city and geographic market, individual meals will be reimbursed in the following ranges (which include tax and gratuity):

- Breakfast: \$15 - \$25
- Lunch: \$20 - \$40
- Dinner: \$25 - \$60

When the firm provides meals at conferences, practice group meetings, firm retreats or similar events, meals purchased by a traveler who chooses not to participate will not be reimbursed.

CLIENT MEALS

When entertaining clients over a meal, expenses are still subject to a standard of reasonableness and should generally be obtainable in the range of \$50 to \$125 (including tax and gratuity) per person depending on the location and meal.

- Under IRS regulations, travelers must substantiate all entertainment expenses by providing the following information: (1) the name of the individual(s) entertained; (2) their business relationship; (3) the time and place of entertainment; and (4) the purpose of the event, itemized receipt is required.

Tips

Tips are a reimbursable expense and should be appropriate to the location, service level and local protocol as follows:

- not to exceed 20 percent of the total restaurant bill or bar bill
- not to exceed \$2 per bag for luggage
- not to exceed \$5 per day for housekeeping
- not to exceed 15 percent for taxis
- not to exceed \$5 per trip on Amtrak

Tips should be itemized when reconciling expenses.

Phone Policy

You are expected to use your best judgment in limiting personal calls to a reasonable length while traveling on firm business. Firm-issued mobile devices should be used whenever possible. Hotel phones should be used only when a firm-issued mobile device or a phone card is not serviceable.

The IT Help Desk can best advise if your firm-issued mobile device will operate as issued or if it will need modification prior to travel in order to work properly in the country of travel. In advance of expected travel, you may request through the IT Help Desk to have your firm issued mobile device unlocked in order to use a local SIM card in countries outside the United States or to add the international plan to your firm issued mobile device.

Technology Equipment

All technology purchases for use at the firm or for conducting firm business are managed by IT Support Services in order to maintain inventory control and data security. A variety of technology equipment and supplies necessary for conducting firm business are available to you by contacting the IT Help Desk at least five days prior to the date the item is required.

Office Supplies and Workspace Equipment

Reasonable purchases of office supplies, e.g., pens, paper or notebooks, while at off-site trial or closing sites which are necessary to conduct firm business will be considered reimbursable. All other office supplies should be obtained before your departure.

UPS, Federal Express, DHL and Courier Services

Please use firm account numbers to send deliveries via UPS, Federal Express or DHL. The firm negotiates rates with these carriers that may be better than rates offered by hotels. The cost of courier service for firm-related business is reimbursable.

Facsimile and Copying

The cost of facsimile and copying directly related to firm business is reimbursable.

MISCELLANEOUS REIMBURSABLE EXPENSES

The following are considered to be reimbursable when traveling on firm business:

- laundry and dry cleaning when travel is longer than five (5) consecutive nights
- fees incurred to access the health club or fitness center of a hotel or nearby fitness center when the hotel does not have one
- Internet connectivity in hotels, airplanes, and other public places. You should be mindful of security issues surrounding wireless connectivity
- overweight and/or over-limit baggage is allowed if the overage is due to equipment required for firm business
- business visa (or equivalent) or expenses associated with obtaining a business visa or passport, i.e., certified copies of birth certificates, required for firm-related business travel
- local SIM cards for use in firm-issued mobile devices or cellphones
- day fees for airline and railroad lounges when you have a layover of four (4) hours or more and where your flight or train has been cancelled or delayed for two (2) hours or more

NON-REIMBURSABLE EXPENSES

Non-reimbursable expenses are listed below. This list is not all-inclusive and there may be additional or similar non-reimbursable expenses that are not listed.

The following expenses are not reimbursable:

- out-of-pocket expenses submitted more than thirty (30) days after they were incurred
- lost luggage and contents (you should work directly with the airline and credit card insurance carrier to recover damages)
- fees or dues for airline VIP clubs and hotel loyalty or other frequent traveler programs
- air travel insurance
- any expenses resulting from obtaining airline miles for personal use
- class of service upgrades other than as specifically permitted as set forth above
- health club services, e.g., massages, manicures, personal trainers
- shoe shines
- haircuts
- clothing of any kind
- personal travel expenses, including sundries or recreational reading
- movies (in-room and in-flight movies)
- costs for personal guests
- normal commuting costs
- parking citations and traffic tickets
- tourist visas
- e-reader devices and supplies
- loss of personal property while traveling
- personal entertainment while traveling
- baggage services that pick up and deliver your bags
- charges for childcare, babysitters, pet care

The firm recognizes that occasions can arise during business travel that may require expenditures that do not fit within the normal travel policy guidelines. When these situations occur, travelers should discuss the situation with the appropriate Staff Manager, Practice Manager or Office Administrator to seek an exception to be reimbursed or to determine how to handle a similar situation in the future. When the situation is known in advance, prior approval is needed.

Your Responsibility

You are solely responsible for the timely reconciliation of your expense report and for providing full accurate documentation as verification of each expense. You must prepare and submit an expense report no more than thirty (30) days following the conclusion of a trip. All reimbursable expenses require that receipts be attached. Where your travel involves multiple trips chargeable to different matters, please segregate those expenses to each matter when you submit your expense report. In like manner, if your travel involves business and personal stays or trips, please segregate those expenses.

Manager Responsibility

Each lawyer is responsible for reviewing the expenses submitted by their direct reports for validity, accuracy, compliance and appropriate documentation prior to timely approval of the expenses. For staff, each manager is responsible for reviewing expenses submitted by their direct reports for validity, accuracy, compliance and appropriate documentation prior to timely approve of the expenses.

TECHNOLOGY

We are committed to using the latest technology to expedite travel arrangements and make travel easier for you. Accordingly, we recommend that you download the following travel-related applications on your PDA:

- Trip Case
- Uber Business
- Amtrak

EXPEDITED TRAVEL

Global Entry

Global Entry is a U.S. Customs and Border Protection program that allows expedited clearance for pre-approved, low-risk travelers upon arrival in the United States. Though intended for frequent international travelers, there is no minimum number of trips necessary to qualify for the program. Participants may enter the United States by using automated kiosks located at select airports.

At airports, program participants proceed to Global Entry kiosks, present their machine-readable passport or U.S. permanent resident card, place their fingertips on the scanner for fingerprint verification, and make a customs declaration. The kiosk issues the traveler a transaction receipt and directs the traveler to baggage claim and the exit.

Travelers must be pre-approved for the Global Entry program. All applicants undergo a rigorous background check and interview before enrollment.

TSA PreCheck™

TSA PreCheck allows select frequent flyers of participating airlines and members of U.S. Customs and Border Protection Trusted Traveler programs who are flying on participating airlines, to receive expedited screening benefits. Eligible participants use dedicated screening lanes for screening benefits which include leaving on shoes, light outerwear and belts, as well as leaving laptops and 3-1-1 compliant liquids in carry-on bags.

You may apply online at www.tsa.gov. Thereafter, you must verify your identity and provide fingerprints at a TSA PreCheck enrollment center.

You must pay the \$85 enrollment fee online or at an enrollment center. There is a five-year term of eligibility, after which members will need to reapply. TSA expects the vetting process to take approximately three (3) weeks. A United States passport is not required to enroll.

Applicants receive a confirmation letter via United States mail. Approved applicants are issued a 'Known Traveler Number' to be used when booking travel. Ultramar will enter your Known Traveler Number in the 'Known Traveler Field' when booking your travel reservations.

The one-time \$85 application fee is not reimbursable.

YOUR PERSONAL TRAVEL PROFILE

Please maintain your personal travel profile. The information will be kept in the Ultramar database and used to satisfy your travel preferences whenever it is possible to do so. You may update your personal travel profile at any time.