

Following are policies for business travel, entertainment expense and miscellaneous expense reimbursement. These guidelines are considered reasonable and customary - we realize some expenses may need to be reviewed on a case-by-case basis by your manager and/or the CEO. All expenses incurred must be in accordance with your departmental budget, as adjusted for current business conditions.

The policy is designed to:

- ensure that all employees have a clear and consistent understanding of policies and procedures for business travel, expenses and reimbursement
- ensure that employees are reimbursed for legitimate business travel and entertainment expenses
- provide employees who must travel with reasonable levels of service and comfort at the lowest possible cost
- maximize the company's ability to negotiate discounted rates with preferred suppliers and reduce travel expenses
- provide the appropriate level of accounting and business controls for the company to ensure that expenses are reviewed and approved by the appropriate manager

Employees who do not comply with the policy may be subject to delay or withholding of reimbursement and/or disciplinary action.

Original receipts should be submitted for reimbursement. Incomplete or incorrect expense reports will be returned to the employee to be completed/corrected. All expense reports must have the approval of the employee's managers – no exceptions.

The business traveler is responsible for securing the best rates available. This may be obtained by reviewing rates from resources such as online resources, travel agents, calling the airline, rail, car rental or hotel directly.

### **Policy – RE: Pre-Approval**

The following will always require pre-approval by the CEO

- All Travel Expenses
- Costs for Entertainment or Events
- Office or facility renovations
- Conferences (other than local classes or meetings)
- Staff development costs
- Performance Incentives

Any expenditure in the above categories above \$5,000.00 must be pre-approved by the Board of Directors.

## **Air/Rail Travel**

All air travel must be reserved in coach class. Employees are expected to organize their schedule to take advantage of advance reservations of at least 7-days or more. If a non-direct flight results in substantial savings to the company and the employee can still reasonably make their appointment times it is encouraged to reserve these flights. Upgrades for air travel are not reimbursable.

If a trip is cancelled after a ticket has been issued, the traveler should inquire about using the same ticket for future travel. Unused airline tickets or flight coupons must be reused for CWB travel. Unused airline tickets or flight coupons should never be discarded or destroyed as these documents may have cash value. To expedite refunds return the unused portion immediately to the issuing authority. Employees should not include any unused ticket portion with their expense reports. The Finance Dept. will not be responsible for unused (e)ticket coupons or vouchers.

If you have a lost or stolen ticket – report the loss immediately to the issuing authority and file a lost ticket application.

The cost of airline tickets for personal use although purchased at the same time as business tickets to take advantage of discounts may not be submitted for reimbursement as a business expense.

Whenever possible, Executive or Senior Management should not travel on the same flight(s).

## **Car Rental**

Car Rentals may be more cost effective to get to your destination. When multiple employees are traveling together, every effort should be made to rideshare or carpool. Employees should reserve a compact or small size car and check for any promotional rates, specials or free upgrades. Always inspect the car at the time of rental to be sure that any damage on the car is noted on the contract prior to accepting the vehicle.

Car rentals may be upgraded to one class of service higher when:

- The cost is no greater, two or more employees are traveling together
- You are entertaining customers
- Cars in the authorized category are not available
- You are transporting excess baggage, such as booth displays or equipment

Make sure the car is returned intact, on time, with a full tank of gas. Collision Damage Waiver insurance may not be a reimbursable item, however is an option for the traveler to purchase at their own expense. Most personal insurance and credit cards will cover this item. Check with

your own insurance provider or credit card provider for details to see if this is covered.

Should an accident occur while traveling on company business contact the Rental Car Agency, local authorities as required, and the Director of Human Resources.

### **Taxi/Shuttle/Parking Fees/Tolls**

The use of airport shuttles and taxis may be a preferred or economic mode of transportation. Please obtain a receipt and include this with your expense report.

When parking at an airport or train station while traveling on business, always utilize the long term parking lots.

Tolls incurred in the performance of bank business and duties are reimbursable. Tolls incurred commuting to and from work are not considered a business expense.

### **Personal Automobile Use**

If an employee is required to use their own automobile for business, they will be reimbursed at a per mile rate established by the Finance Department. Mileage will be reimbursed via a completed Expense Reimbursement Form. Employees are not reimbursed for the mileage incurred to and from work unless they are working on an on-call status approved by their manager.

### **Lodging/Hotels**

Hotel reservations should be made securing the best available rates and utilizing hotel properties considered in the "moderate" category. Corporate rates should be requested in all instances.

Employees will not be reimbursed for "no-show" charges unless there is sufficient proof of billing error or circumstances beyond the travelers control; employees cancelling a reservation should request and record all cancellation numbers should a billing dispute occur; employees are responsible to note and adhere to cancellation and check-out times.

### **Meals**

Employees will be reimbursed for personal meals while traveling on business. Personal meals are defined as meal expenses incurred while dining alone.

### **Business Meals**

Employees will be reimbursed for business-related meals with other employees under the following circumstances:

- When a client/customer/vendor is present and there is a valid business purpose/reason/discussion for the meeting
- When at least one company employee is from out of town
- When for confidentiality purposes, business is best conducted away from company premises.

The following documentation is required for reimbursement:

- Names of individuals present, title(s), company name and general business purpose
- Name and location where meal or event took place and exact amount and date of the expense
- Approval by the employee's manager

### **Alcoholic Beverages**

The company expects that employees will act responsibly when consuming alcoholic beverages in connection with a business function. If an employee cannot safely drive after such an event, the employee should arrange alternative transportation. Any employee who is arrested and convicted for Driving Under the Influence while in the performance of company business, or when returning from a business function, is subject to disciplinary action up to and including termination.

### **Miscellaneous Expenses**

The following miscellaneous expenses require management approval or pre-approval:

- Office Services – copies, faxes overnight mail/delivery/postage (from hotels)
- Memberships (professional or civic organizations) – must be pre-approved by the CEO

The following are generally NOT reimbursable expenses (exceptions require CEO approval):

- Airline Club/Country Club membership/dues
- Business gifts
- All Client/Customer Entertainment
- Seminar fees
- Hotel upgrades
- Movies; including in room
- Parking Tickets/Fines

- Delinquency Fees/Finance Charges/Annual Fees for personal credit cards
- Excess Baggage Charges
- Expenses for travel incurred for companion or family members
- Expenses related to vacation or personal days adjacent to a business trip
- Loss/theft of personal funds or property
- No-show charges for hotel or car services
- Non-compulsory insurance coverage's
- Rental car or Airline upgrades
- Repairs due to accidents
- Mini-bar charges
- Access to gyms

### **Other Expenses**

Other expenses not expressly defined above or covered by another policy or guideline provided by the Finance Department must be approved in advance by the CEO.

### **Reporting of Violations**

Any violations of this policy must be reported to the Audit Committee Chair within three (3) business days of discovery.

### **Accountability**

Accountability for adherence to this policy is the responsibility of the CFO.