

Antalpha Travel Policy

Antalpha Group Travel & Expense Reimbursement Policy v1.0

Policy Scope

This policy applies to personal expense reimbursement for employees of Antalpha and affiliates.

Employee's Responsibilities

All employees should read this Policy prior to planning and incurring business expenses, including but not limited to Business Travel and Entertainment. Employees are required to abide by this policy and report all expenses for legitimate business purposes promptly and accurately with relevant documentation.

Policy Outline:

- I. General Policy**
- II. Entertainment & Meals**
- III. Business Travel**
- IV. Incidental Business / Office Expenses**
- V. Non-Reimbursable Expenses**
- VI. Expense Submission**

This policy takes immediate effect and may be revised, as necessary. Interpretation and revision of this policy shall be vested with the Accounting department. Exception to this policy requires CEO approval.

Policy Owner: Accounting Dept. in connection with the Administration Dept.

Antalpa Travel Policy

1. General Policy

- The Company reimburses its employees for **reasonable and necessary expenditures** with **genuine business purpose** while conducting normal business activities.
- It is the Company’s philosophy to stay lean and agile with its financial wherewithal and encourages frugality in business expenditures.
- For example, in situations where phone calls and video conferencing can fulfill the business needs, business travel should be avoided. If traveling to one business site over another would require less traveling for the group and incur less expenses overall, such option is recommended. Traveling employees should consider other options to save travel costs, e.g., if two or more people are traveling together, it is recommended that employees of the same gender share a room to save costs.
- Expense reimbursement not in the spirit of the above or not in compliance with the following policy may be declined.
- The Company does not tolerate employee behaviors for submitting illegitimate receipts/fapiao and fictitious expenses. Fraudulent acts conducted by employees may result in employee dismissal and/or reporting to the applicable authorities.

II. Entertainment & Meals

Generally, business entertainment and meal expenses can be incurred when there is a legitimate business purpose to provide a business meal or entertainment to customers or suppliers, such as:

- When the recipient has a potential or actual business dealing with the Company; or
- When the expenditure directly precedes or follows a business discussion that would benefit the Company.

Hospitality / Entertainment

To qualify for business hospitality/entertainment expenditures, the following criteria shall be met:

1. It is infrequent in nature;
2. It is in good taste and occurs at a business appropriate venue;
3. It is reasonable and appropriate in the context of the business occasion;
4. It does not violate any laws or regulation, or the standards of business conduct of both provider’s and recipient’s organization.

The hosting personnel shall ensure that the entertainment expenditure is within the budget of the business unit/functional group and is approved by the business unit/functional group head.

III. Business Travel

Business Travel refers to an employee required to travel to another destination (outside their base city) for business purposes. The business travel period starts from the time of arrival at the first destination and ends at the time of departure from the last destination. Below is a list of allowable business travel expenses:

Allowable Expenses	Financial Support
Airfare / Rail / Liner	Booked through Company

Antalpa Travel Policy

Hotel accommodation	
Transport cost for the following: <ul style="list-style-type: none"> • Between home residence and airport • Between airport and hotel • Between cities 	Reimbursement
Overseas Business Entertainment	
Expenses incurred directly in relation to the travel purposes (i.e. registration/course/conference fees; visa fees; booking of meeting/function/exhibition venues, vaccinations)	
Meals	Covered by travel per diem
Local transport costs (between hotel and work/meeting/conference venue)	
Incidentals (out-of-pocket expenses): SIM cards, WIFI charges, laundry, etc.	

Employee relocation requires the written approval of the CEO, and the above business travel policy is not applicable to employee relocation (Please refer to Appendix II for more information on employee relocation).

Travel Request Application

1. Travel request including travel budget approved by director or above before travel. Employees are encouraged to have proper and early planning for business travels. It is advised that Travel Request be submitted for approval one month before travel, to receive a better rate for airfare and hotel booking.
2. Upon the approval of the Travel Request, employees should notify the Admin. Dept. on a timely basis to book airfare and hotel accommodation. Airfare and hotel rates usually rise as travel date nears. It is recommended that airfare and hotel bookings are done a month before travel, if possible. Unreasonably incurred incremental costs due to the lack of planning may not be reimbursed.

Employees may also choose to self-book if cheaper rates are found to save on the department's budget. In such cases, the employee should submit the quote from the Admin. Dept. along with his/her expense report to the Accounting Dept.

Air ticketing

The Company reimburses air travel only for Economy class. If an employee decides to fly Business or other upgrade seating, the employee is responsible for the incremental cost.

The Admin. Dept. will book the lowest airfare available for all domestic and international flights. Employees requesting for a flight with a particular airline to obtain frequent flier miles will be responsible to pay for the incremental cost of a higher airfare. Please note this preference when requesting booking with the Admin. Dept.

Antalpa Travel Policy

Purchase of airfare is initiated by the admin. personnel through an appointed travel agency and charged directly to the Company. Employees are not required to make upfront payments. The air ticket shall be purchased based on the lowest logical fare, taking into the following considerations:

- Reliability and safety record of the airline;
- Reasonable flight connections and travel time;
- Type of ticket may be refundable/flexible for changes, if employee is approved by department director or above that a change in travel plan is likely.

Rail / Liner

For travel via train/liner, the standard/economy/second class of travel should be selected with additional considerations, such as reasonable travel time.

Ground Transportation

In general, employees should use the most economical travel arrangement for re-imbusement purposes. For example, if airport express and the subway are readily available, such as in Singapore, Hong Kong, Korea and Japan, it is advisable to use such mode of transportation over more expensive travel options, such as taxis. Employees choosing more expensive travel arrangements may be required to pay for the incremental costs above and beyond the cheaper travel option.

The following ground transportation is reimbursable for business travel, which excludes daily travels to and from workplace:

- 1) Transport between home residence and airport for business travels;
- 2) Transport between overseas airport and hotel/work/conference venue;
- 3) Transport in local area (other than between residence and office) via personal vehicle:
 - a. Only mileage can be claimed based on the prevailing rate for distance travelled.
 - b. Mileage expenses are reimbursable only in jurisdiction where the local tax authorities, e.g., IRS (US) and RTO (AU), allow for business-expense tax deduction. It is the employee's responsibility to ensure that the expense claims are in compliance with the standards set by local tax authorities.
 - c. Long-term parking should be used for travel exceeding 24-hours. Parking and traffic violations are not a reimbursable expense.
- 4) Transport for cross city/state travel via car rental:
 - a. Car rental is an option in cities where such mode of transport is more economical than by taxi and where taking the subway is impractical and uncommon, e.g., travels in the US, Canada, Australia and certain European countries.
 - b. Car rental reimbursements must comply with the following:

Antalpa Travel Policy

- Rental car size: Compact/economy vehicle is the standard. An upgrade is allowed if there is a legitimate business need, e.g., transporting tradeshow equipment needing more cargo space, or if three or more persons are traveling together.
- Fuel: Company will reimburse for fuel used for rental cars during business travel, but does not reimburse for on-site rental company refueling.
- Insurance: Company will reimburse for basic comprehensive car rental insurance, but does not reimburse for other coverages or rental options.
- Damage or repair insurance: Company will reimburse up to the insurance deductible for damages or repairs incurred on rental cars.
- Return: Rental cars should be returned to the original rental location in order to avoid costly drop-off charges.

Any other local transportation costs (such as travelling between hotel and work/meeting/conference venue) are deemed to have been covered by the **travel allowance** and, therefore, are **not** reimbursable.

Accommodation

The Company will pay for accommodation on business travel requiring overnight stay in other than the base city.

As soon as your travel is approved by your manager, please contact the Admin Dept. to book your airfare and hotel accommodation. The Admin. Dept. will make hotel bookings as follows:

- The Company's approved expense for accommodation is in attachment :
https://drive.google.com/drive/u/0/folders/1xP8h5WIZayahePlwc_Zt5dYsISipaaZB



2023

协议酒店和住宿

If the company has a contracted hotel at the business trip destination, it is advisable for employees to choose the contracted hotel. If employees do not choose the contracted hotel, the accommodation expenses must not exceed the price of the contracted hotel, and any excess amount will be borne by the employee.

If the company does not have a contracted hotel at the business trip destination, employees are free to choose a hotel, using the prices of contracted hotels in the vicinity of the business trip location as a reference.

- For popular business travel destinations, the Company usually has a long-term contractual agreement with local hotels under preferred pricing.
- If an employee chooses to stay in a hotel that costs more than the Company's standard room night, the employee shall bear the incremental costs.
- If an employee combines a business trip with a personal trip on the same trip, travel expenses, including accommodation and meals, for the personal portion should be borne by the employee. For example, if a business meeting ends on Friday, the Company does not pay for business expenses beyond the Saturday stay.

Antalpa Travel Policy

- For stays over 2 weeks, the Admin Dept. will seek discounts from the hotel. For longer travels, the Admin. Dept. may book a short-term apartment rental to save costs.

Travel Allowance (per diem)

Employee travel on business trips are given a daily allowance. This allowance is meant to cover certain living expenses incurred during the business travel, such as the cost of meals, transportation between hotel and workplace, and any incidental items like laundry, telecommunication etc. The travel allowance is set by destination country (see below for the rate table).

Travel Per Diem by Destination Country

Country / City	Travel Allowance Daily Rate (USD)	Country / City	Travel Allowance Daily Rate (USD)	
United States, Japan, Western Europe	60	Hong Kong, Singapore, South Korea, Taiwan	40	
Australia, UAE	50	Mainland, SE Asia (Indonesia, Thailand, etc.), Brazil, Turkey	30	

The total travel allowance is calculated based on the actual number of business travel days and does not include the in-flight time to and/or from the destination country. If there is a combination of both business and personal travel in one trip, the travel allowance is not provided for days of personal travel. The travel allowance is also not applicable for employee relocation.

Employees claiming per diem shall still submit travel receipts. Amounts without the support of receipts will be reimbursed as personal income, in accordance with local regulations.

If the employee incurs travel expenses significantly above and beyond the per diem on average for the whole business trip, please submit the actual receipts to the Accounting Depart. and explain why such expenses above the per diem meet the criteria for **reasonable** and **necessary expenditures** with **genuine business purpose**. The Accounting Dept. has the authority to reject any reimbursement claim not meeting this policy.

Note: For domestic business travel (within the country but cross cities), the travel allowance shall be 30% of the country's daily rate listed in the tables above.

Foreign Currency

Due to bank account and foreign currency exchange limits, the rules for reimbursement currency are as follows:

- Employees of China entities: in RMB only
- Employees of Singapore entities: in SGD or USD based on employee's preference.
- Employees of other overseas entities: USD or stable coin

Foreign exchange fees are considered in the daily allowances.

Antalpa Travel Policy

Expense reports shall be supported by a valid proof of currency conversion rate as follows:

- A generally accepted 3rd party FX rate publisher, such as Bloomberg.com, Oanda.com, etc.
- Claims system default rate, maintained by Finance / Treasury Team.

IV. Incidental Business / Office Expenses

Generally, employees are not allowed to make purchases and claim through the T&E reimbursement process unless the purchases are for incidental goods with small amounts. Employees are encouraged to follow the procurement policy and understand the procurement approval process prior to making large business purchases.

For exceptional cases where upfront payment must be made by the employee themselves and to seek reimbursement subsequently, such reason/justification shall be clearly stated in the reimbursement claim report details.

V. Non-Reimbursable Expenses

Items other than mentioned above may not be allowed for personal expenditure reimbursement.

The following items are deemed not reimbursable under this Policy. Please check with the Accounting Dept. if you are unsure of reimbursement for your expenditure prior to purchase.

- Any personal or dependent's expense
- Personal items and services, e.g. luggage or briefcase, clothing, cosmetics, barber, hair stylist etc.
- Accidental loss during business travel, e.g. lost or damaged luggage or personal belongings, traffic / parking fines, etc.
- Personal entertainment during business travel, e.g. in-room purchases, spa/massage, sightseeing tours
- Medical expenses
- Personal charitable donations
- Commuting cost between home and place of work, e.g., mileage, car rental, public transport
- Personal Credit Card Annual/Membership fees, financial charges, exchange rate fees and interest expenses, and
- Expenses for dependents/companion while on business travel

VI. Expense Report Submission

1. Expense Report submission requirements:

- **Timely submission**

Expense report for employee reimbursement shall be submitted to the Accounting department on a timely basis. Please list the **business purpose** of each expenditure in the reimbursement worksheet, which will be used for audit and tax purposes. Expense reimbursement without genuine, valid business purpose or considered excessive spending will be declined.

Employees are recommended to submit an expense report following each calendar month. Reimbursement claims submitted **after 30 days** from the date of incurrence shall be accompanied with a valid justification for the delayed submission. Late reimbursement submission may cause the expense to not be taxable deductible for the Company, and, if this is the case, the employee may be asked to repay to Company for such tax deduction loss.

- **Valid receipts/invoices**

Antalpa Travel Policy

Proper, valid and legitimate receipts/invoices must be submitted with the expense report. Submission for reimbursement in mainland China requires original fapiao for tax deduction purposes. No reimbursements will be made in mainland China without legitimate fapiao.

- **Receipts, invoices/fapiao must be:**

- Authentic and unaltered
- Clear, readable and recognizable
- With completed details, such as vendor name, location, date, itemized charges and expense amount, and proof of payment. For business entertainment, the number of attendees shall be provided in the expense report.
- Please note that credit card statements and credit card charge slips are considered proof of payment and are **not** considered valid receipts.

Original receipts/invoices are required for reimbursement. In certain cases, original receipt may come in the form of a digital copy, e.g., airline ticket receipt or QR code receipt. Please print out digital receipts and submit to the Accounting department in hardcopy format.

In the event the receipt is lost, the employees should make every effort to retrieve another copy, e.g., requesting the vendor to reprint the receipt. Without proper receipt, the expense may be un-reimbursable, as the expense will not be tax deductible and will not meet the requirements of external auditor.

2. Management Approval

All business entertainment & meal expenses shall be approved by the employee's superior (a director level manager in charge of a business unit or functional department). Business entertainment & meal expenses that lack proper documentation (i.e., itemized receipt and the list of attendees) or a clear business purpose will not be reimbursed.

Expense reports deviating from this policy may not be reimbursed.

3. Illegitimate receipts/fapiao and fictitious expenses are prohibited

Reimbursement submissions will be audited on a periodic basis. There may be a time lag between the reimbursement and the actual audit, as audits will be conducted internally and by external auditors. If at a later date an employee is found to have submitted false claims or receipts, the Company may take appropriate actions involving the HR department/applicable authorities and face disciplinary actions.

People managers approving employee expense reimbursements have the responsible for reviewing and determining the legitimacy of the expense reimbursement claims. If the Company finds a people manager not performing his fiduciary duty to safeguard the Company's assets, the employee may face disciplinary actions.

Antalpa Travel Policy

Appendix 1 – Definition Business Travel and Relocation

Type	Business Travel	Assignment / Expatriate	Relocation	Remote Office
Nature	Requested by Company			Request by Employee
Employment Contract	No Change	No Change	Changed	No Change
Travel Period	<1 month	1 – 3 months	>3 months	As approved
Air-Tickets	Booked & paid by Company		Relocation Package (as defined by HR)	At one's own expense
Accommodation	Hotel	Hotel / Rental Apartment, whichever is lower cost		
Travel Allowance	Daily Allowance by Country			

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Staff Benefits

Transportation

Employees who work in the office for over 10 hours and beyond 9 pm (local time) may be allowed to claim expenses incurred for local transport from the office back to home. When taking taxi or hailing service, employees are expected to be thoughtful and prudent in their choice of transportation. All “premium” types of transportation and above may be disallowed unless there is a strong valid justification and is approved by relevant financial authority. Employees in mainland China can get 30 yuan overtime meal allowance as well. Employees in other countries are not covered by the meal allowance for the time being.

If you have any suggestions please send to the TE@antalpa.com