

NBCUNIVERSAL BUSINESS TRAVEL & EXPENSE POLICY

HEADLINE

NBCUniversal employees, and all others who are assigned an NBCUniversal Corporate Card or who submit expenses via Concur, must adhere to the guidelines outlined in this policy when incurring reasonable and necessary business-related expenses, including required business travel.

This policy helps ensure that the Company aligns to legal and regulatory standards and allows employees to conduct business safely and successfully wherever in the world they may travel. It is structured to highlight the various scenarios during which you may incur business-related expenses and what is expected of you in each of these instances.

While this policy document intends to be inclusive of many of the expense scenarios you may encounter, it cannot cover all scenarios. For this reason, you are expected to display financial prudence at all times, which may include making sound judgments beyond what is outlined here and in accordance with our [Code of Conduct](#). Failure to adhere to these expectations or to display financial prudence in your business transactions may result in disciplinary action, up to and including termination of employment.

Your business unit may have additional travel & expense expectations which are outlined in a separate policy and can be found via the [Travel & Expense website](#). Additionally, there are other policies that govern Company spending to which you are expected to adhere, some of which are outlined in the *Support* section of this policy.

TELL ME MORE

Applicability

This policy applies to all NBCUniversal employees globally, as well as any other individual who is assigned an NBCUniversal Corporate Card or who submits expenses via Concur. For those countries where Concur is not available, the local documented process should be followed. Employees represented by a union or guild may be governed by other travel and expense terms and conditions, subject to their applicable collective bargaining agreement.

General Expectations

- Expenses must always be reasonable, and kept to the minimum amount necessary to perform authorized Company business. If you have a question about whether an expense is appropriate, you should discuss with your manager before purchase or booking.
- Submit expense reports in [Concur](#) within 30 days following the completion of a business trip or expense transaction. Expense reports must include all appropriate documentation with details of each expense and business purpose (where required).
- All participants/recipients must be listed in the Concur entries for meals, Gifts, and Business Entertainment (as these terms are defined in company policies).
- If you are a T&E Approver, it is your responsibility to carefully review and approve or reject any submitted expense report within 30 days of receiving it in Concur. You are required to approve each expense report and your approval certifies that all submitted expenses are 1) compliant with the Company's policies and 2) properly documented.
- If you are a T&E Approver, Business Unit Leader, or Chief Financial Officer, you are responsible for the proper day-to-day administration and enforcement of this policy.
- If you are paid by a third-party and incur out of pocket expenses on behalf of NBCU, you cannot submit these expenses in Concur.

THE FINE PRINT

Managing Your Corporate Card

Refer to the [Managing Your Corporate Card Guidance Card](#) for additional information

Non-represented Staff employees who routinely incur business-related expenses (more than \$1,000 or local equivalent per year) should [apply](#) for the Citibank Corporate VISA Card (the Corporate Card) which is the required method of payment for all NBCU business-related travel and expenses.

- You are responsible for all charges on the Corporate Card.
- You may not use the Corporate Card for any non-NBCUniversal business expenses. Because of this, the Company actively monitors for charges that do not follow our policy.
- Do not link your Corporate Card to any third-party online payment platform such as PayPal, Venmo, etc.
- Do not use your Corporate Card to:

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- Procure any category of purchase managed by the NBCU Group Procurement team. This includes, but is not limited to any Technology (Software, IT Hardware, Cloud, Telecom), Market Research, Security Services, Facility Services, or Marketing. Refer to [Procurement Policy Frequently Asked Questions](#) for more information.
- Any purchase that can be made through an existing Purchasing tool. Refer to the [NBCU Procurement Guide](#) for a list of buy channels, links, and what can be bought through them.
- Any purchase that would require a Cyber Security and/or Privacy review. Refer to [Third Party Security Program Portal](#) to initiate a Cyber Security review and [The Trust Intelligence Platform](#) to initiate a Privacy review.

If you have been assigned a separate Purchasing Card to charge production, event, or marketing-related services that cannot be paid by invoice, refer to the [NBCUniversal Purchasing Card Policy](#) for further guidance.

Managing Expense Reports

Refer to the [Managing Expense Reports Guidance Card](#) for additional information

- Submit expenses via Concur within 30 days of completion of your trip/rental/charge. Include the destination and business purpose of each trip and/or mode of travel. Incomplete forms or reports lacking appropriate receipts, approvals, or other required documentation will result in reimbursement delays or expense denials.
- Submit allowable out-of-pocket expenses within six months of the purchase date. Reimbursement will be via the NBCU Payroll system.
- If a delegate is used to create an expense report, you must perform a final review of expenses and submit the expense report.
- No employee, under any circumstances, may approve their own expense report.

Getting Ready to Travel

Employees are expected to adhere to local laws and regulations and observe normal safety precautions while traveling on Company business. Visit the [NBCU Travel Safety page](#) and check your local government’s travel safety websites for the most current travel information.

The Corporate Card should be used for all reimbursable business expenses incurred as a result of work travel. If you have not been issued a Corporate Card, you must ask your manager to book travel for you and to submit your expenses through Concur.

- If you are traveling for the first time, review your Concur profile to ensure it is using the identity that matches your assigned Government ID.
- You must book airlines, rental cars, hotels, ground transportation, and related travel services through the [NBCU Travel & Expense website](#) or directly at www.concursolutions.com. In all instances, the travel must comply with [NBCUniversal’s High Risk Travel Policy](#). Book directly using the online tool to limit fees incurred by NBCU for travel booked via phone.
- Make all travel arrangements at a reasonable cost consistent with achieving the goals of the business trip.
- Do not use our designated travel agency BCD for personal travel requests. Select travel discounts are available to employees via [NBCU Now or by calling the BCD Leisure number at 1-800-913-1942](#).
- Eligible employees are automatically covered by NBCU’s Accidental Death and Dismemberment insurance at no cost while traveling on Company business. Additional travel insurance is regarded as a personal expenditure for which reimbursement will not be made.
- If your itinerary includes work travel and approved personal travel, only use your Corporate Card for the work travel; you must pay for your personal travel and expenses personally.

EXPENSE SCENARIOS

Traveling by Air

Refer to the [Traveling by Air Guidance Card](#) for additional information

- Purchase the lowest logical airfare without any significant inconvenience to you.
- Book using your Corporate Card through [Concur/BCD Travel](#), the Company’s designated travel agency or call the NBCU Travel Agency at 855-844-NBCU (international numbers available via the [NBCU Travel website](#)).
- Whenever possible, fly on preferred (contracted) airlines where NBCU has a negotiated discount. [Concur/BCD Travel](#) offers travellers the lowest possible rates with our negotiated travel partners.

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- Book as early as possible to take advantage of all available discounts or promotional programs, including those requiring cancellation fees. Generally, non-refundable tickets will be issued. Employees should use discretion to balance need for flexibility with pricing.
- Concur/BCD Travel will present available flight class options that are permitted under the Policy. Employees must select from the permitted options in Concur/BCD Travel.
- Take the lowest logical non-stop flight offered unless there is a valid business reason to take an alternate flight. You may choose to select flights with connections which may result in a more substantial discount providing all other low airfare policy objectives are met.
- Contact BCD Travel for unexpected or emergency travel changes at (855) 844-6228 [US] or (818) 487-0933 [Outside US]. If you are traveling outside your home country and need to update your travel arrangements, you must contact your home country BCD Travel office.
- To request a travel upgrade (outside of your designated flight class), secure the approval of your Manager and Business CFO. Following this, the NBCUniversal CFO and/or designee must also approve.

Traveling by Taxi/Uber/Lyft/Car Service

Refer to the *Traveling by Taxi/Uber/Lyft/Car Service Guidance Card* for additional information

- Select the lowest cost method of transportation and collect a receipt to submit with your expense report.
- If you use Uber frequently, you can connect [Uber Business](#) to Concur directly so that transaction details automatically upload to Concur for easier expense processing. Use caution when choosing Uber/Lyft for airport transportation due to variable “surge pricing” in comparison to NBCU car service fixed rates.
- Use a taxi only if it is regulated by the local government and can provide a metered fare and receipt.
- Approved [NBCU car services](#) are generally used for airport transfers and may also be used for business-related city travel at major NBCU work locations. Gratuity has been negotiated into preferred car service vendor’s rates, so additional gratuity to drivers will not be reimbursed by NBCU.
- You may use and expense an approved car service, taxi, or Uber/Lyft for trips between your home and your home office location only between the hours of 9pm and 6am and only if you have worked more than 10 hours in the day.

Renting a Car

Refer to the *Renting a Car Guidance Card* for additional information

The Company has partnered with Hertz for business car rentals and with National/Enterprise for Production-specific vehicle rentals (trucks, larger SUVs etc.).

- Book through NBCU partners to ensure the vehicle rental is properly covered by NBCU insurance programs.
- Charge all car rental costs on the Corporate Card and retain the receipt.
- Book Hertz car rentals via [Concur](#) or directly with Hertz using the NBCU Corporate Code [50013](#). When vehicles are not available through Hertz, a secondary partner National/ Enterprise, is available. Book using NBCU’s contract number [XZ17C8R](#) and charge to the Corporate Card.
- Avis should be used when Hertz or National/Enterprise are unavailable or unable to provide vehicles. The NBCU business travel code for Avis is [A965500](#).

Using Your Own Car

Refer to the *Using Your Own Car Guidance Card* for additional information

NBCU will reimburse all employees globally for mileage that qualifies as business mileage under your local tax code.

- Request reimbursement when you are driving your personal vehicle solely for business purposes. For example, driving out of the office to meet clients or to the airport for business travel. Commuting between your home and office is not considered reimbursable.
 - Mileage rates based on the country’s guidelines are programmed into Concur once mileage is entered.
 - Reimbursement is intended to cover fuel, operating expenses, repairs/maintenance, depreciation and insurance.
 - Parking fees and tolls can be reimbursed with receipts.

Traveling by Train

Travel by train on Company business is allowed at economy rates, subject to the following regional guidelines:

- **United States:** Amtrak, Acela Express, or Brightline business class travel is authorized when necessary to meet timely arrival at a destination. First Class travel is prohibited.
- **EMEA:** Eurorail and regional trains are permitted. Trips six hours or less should be booked in Coach.
- **APAC:** Highspeed trains are permitted. Trips six hours or less should be booked in Coach.

Booking a Hotel

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- Book all rooms using [Concur](#) or NBCU’s designated travel agency BCD to ensure traveler safety/standard of care at a competitive rate. Negotiated hotel rates and accommodations are designated for major cities where NBCUniversal normally conducts business. The rates for hotel reservations are set when booking a reservation and should be confirmed at the time of check-in.
- Select a standard room only. Generally, upgrades to suites, concierge or executive floors are not permitted unless provided at the standard room rate.
- Charge the room to your Corporate Card at the time of booking and retain the receipt.
- Promptly cancel the room if your plans change. Hotel “no show” charges are not reimbursable, except upon the approval of your Manager.
- If attending a conference/seminar where a specific hotel has been contracted, book the room through the sponsoring organization only if the rate is lower than the corporate rate.
- Do not share a room with a colleague.
- Use of home-share accommodations such as Airbnb, VRBO, etc. is prohibited.

Dining

- Display financial prudence when purchasing food & beverage. Consider if you would have personally purchased the item throughout the course of a normal day when not engaged in business travel (i.e. your morning coffee) and seek reimbursement accordingly.
- Report your own meals when traveling with other employees. When not practical to do so, the most senior employee attending the meal is required to cover the business meal expenses. Retain the itemized receipt, report the business meal as “Meals Multiple Attendees,” and list all internal and external participants in the Concur entry.
- If you hold a title at or above Vice President, you may on occasion with pre-approval from your manager, take personnel out for a business meal or host a meeting with food, and the cost should remain as reasonable as possible.
- The most senior employee attending the business meal should incur the expense and report the meal as “Meals Multiple Attendees” and list all participants in the itemization entry.
- Tip in accordance with local customs but no more than 20%. Cash tips should not be provided.
- Retain the itemized and signature receipts for all food & beverage purchases and submit the receipt for any single purchase greater than \$250 via your Concur expense report.

Gifting and Entertainment

Consult the NBCUniversal Global Gifts and Business Entertainment Policy

NBCUniversal prohibits offering, promising, or giving Gifts, Business Entertainment, or anything else of value to improperly influence a Government Official or private party to gain a business advantage.

[NBCUniversal’s Global Commercial Gifts and Business Entertainment Policy, Global Anti-Bribery/Anti-Corruption Policy, and Government Interactions and Political Activities Policy](#) governs offering and receiving Gifts and Business Entertainment to or from Government Officials or Business Partners (defined as current/potential suppliers, contractors, customers, third party intermediaries, or other commercial entities/individuals engaged in commercial dealings with NBCU).

Employees should be familiar with and refer to these policies *prior to* incurring any Gift or Business Entertainment expense on your Corporate Card. That policy requires pre-approval for expenses in many cases. Gift or Business Entertainment expenses that do not comply with these policies may not be reimbursed.

Giving Discretionary Items and Entertainment to NBCUniversal Employees and Talent

Discretionary giving of items and entertainment to employees and talent can include, but is not limited to, the following:

- Company-assets: Tickets, company “swag”, marketing/promotional items
- Certain categories of “reimbursable purchases”:

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| Reimbursable | <p>Gifts recognizing “lifecycle” events (birth of a child, employee wedding or engagement, hospitalization of employee, death of an immediate family member of employee, retirement)</p> <ul style="list-style-type: none"> • (1) The employee is permitted one gift per Lifecycle Event from the Company up to \$200, excluding shipping & handling/delivery fees (or local currency equivalent as outlined in the Appendix), • (2) the gift must be purchased for the employee (not their family members), and • (3) the gift is to be purchased by the employee’s direct supervisor and properly documented in Concur. |
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The following are examples of discretionary giving that are not reimbursable – such purchases will be rejected as

personal expenses and must be reimbursed to the Company:

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| Not Reimbursable | Birthday gifts or celebrations/parties for NBCU employees |
| | Gifts for an employee leaving the Company (excluding retirement) |
| | Gifts related to commemorating an individual's years of service/anniversary. NBCU has a milestone gift program for employees. |
| | Cash-replacement gift cards are not allowed, i.e., Visa, Mastercard, and Amex. Specific merchant gift cards are permitted for lifecycle events, e.g., a gift card to a baby store for a birth. |

Incurring Other Business-Related Expenses

You may have reason to incur other business-related expenses, some of which are reimbursable and others which are not. Please refer to the ***Incurring Other Business-Related Expenses Guidance Card*** to learn more and carefully familiarize yourself with the expenses that are not reimbursable. Itemized receipts are required to be submitted for any expenses greater than or equal to \$250.

Additionally, consider the following guidance associated with special charges:

- **Donations/Payments to Non-Profit Organizations:** You must process donations or payments through [Accounts Payable](#), including donations in lieu of flowers for bereavement of an employee's death in their immediate family. Do not make charitable donations with the Corporate Card and refer to the [NBCU Charitable Giving Policy](#) when making a donation.
- **Cash Advances:** Use cash advances sparingly and for approved business purposes only. Submit your request through [CRAFT](#) which is routed to your business unit's Finance Manager for approval. Cash advances are processed through Concur, and you must itemize how you spent the cash with the same receipt thresholds.
- **Direct Billing:** You do not have the authority to have travel, lodging, meals, or entertainment expenses billed directly to the Company via invoice, except where the Company has established an existing account and granted consent to you to charge to that account (i.e. for corporate events).
- **Government Administrative Fees & Expenses:** You may be required to pay Government Entities for routine administrative fees or expenses associated with legitimate, work-related government services (e.g., FOIA requests, obtaining court records). Such fees and expenses are reimbursable as long as they meet the General Expectations above, and payment is made directly to the appropriate Government Entity (not to any individual), unless an exception to pay an individual is reviewed and approved by Compliance. This does not permit facilitation, or "grease" payments, to Government Officials, which are prohibited. See the [NBCUniversal Anti-Bribery/Anti-Corruption Policy](#) for further guidance.

Incurring Personal Expenses

- Do not use the Corporate Card for personal expenses. The purpose of the card is to enable payments for business-related expenses.
- Carefully consider traveling with family during business trips and/or extending business trips for personal reasons. Expenses associated with an employee's family are never reimbursable, and any costs associated with extending business trips for personal reasons are not reimbursable.
- If necessary, itemize charges as "personal" when included with business-related expenses. For example, you pay for a movie at a hotel, which is not an allowable expense, and then do not have time for a revised invoice. Itemize the difference, indicate it as "personal" (see check box in Concur), and reimburse NBCU following the [Click to Pay process](#) within 30 days [US]. Contact your Finance partner for reimbursement instructions if you are outside the United States.

SUPPORT

| Topic | Contact |
|--|--|
| Understanding the T&E Policy | Travel.Admin@nbcuni.com [US] |
| | EUTravelhelpdesk@nbcuni.com [EU] |
| | uktravelhelpdesk@nbcuni.com [UK] |
| Accessing the NBCU T&E Website | NBCU T&E Website |
| Accessing the Concur Website | Concur Website |
| Responding to health or safety issues during travel | International SOS |
| Cancelling/booking complex reservations | 855.844.6228 [US] |
| | 1.818.487.0933 [Outside US] |
| Creating a T&E Report | 866.793.4040 |
| Getting help from Citibank for my Corporate Card | 800.248.4553 [US] |
| | Contact Us Page [Outside US] |
| Connecting Uber to Concur directly | Uber Business Profile Page |
| Adding an International calling plan to my mobile device | ServiceNow |
| Other Relevant Policies | <ul style="list-style-type: none"> • Purchasing Card (P-Card) Policy • Global Gifts & Business Entertainment Policy • Anti-Bribery/Anti-Corruption Policy • Charitable Giving Policy |

APPENDIX**Local Currency Conversion Table: Employee Lifecycle Event Reimbursement**

| Country | Final Value Local Currency (based on \$200 USD) |
|---------------------------------|--|
| ARGENTINA | 31,000 |
| AUSTRALIA | 250 |
| AUSTRIA | 200 |
| BELGIUM | 190 |
| BRAZIL | 500 |
| CANADA | 225 |
| CHINA | 1,180 |
| COLOMBIA | 360,000 |
| EGYPT | 1,700 |
| FRANCE | 185 |
| GERMANY | 170 |
| HONG KONG | 1,750 |
| INDIA | 7,700 |
| IRELAND | 170 |
| ISRAEL | 1,000 |
| ITALY | 175 |
| JAPAN | 22,600 |
| KOREA, REPUBLIC OF | 248,000 |
| MEXICO | 2,700 |
| NETHERLANDS | 190 |
| NEW ZEALAND | 300 |
| RUSSIA | 10,000 |
| SINGAPORE | 300 |
| SOUTH AFRICA | 1,800 |
| SPAIN | 160 |
| SWITZERLAND | 280 |
| UNITED ARAB EMIRATES | 650 |
| UNITED KINGDOM | 135 |
| UNITED STATES | 200 |