

Group Policy

Group Travel Policy

1. Scope

This is a group-wide policy applicable to all employees and contractors of Sibelco Companies. In addition employees are obliged to abide by procedures of their local travel systems.

This policy may be translated but must otherwise be applied in its current form throughout Sibelco.

2. Purpose of the Policy

The purpose of this policy is to define the basic rules and standards regarding business travel of Sibelco employees and contractors.

3. Safety First

The safety of a travelling employee is a priority, no business objective should be a reason for exposure to life, injury or health risk. Local rules and safety instructions are to be strictly followed during travel:

- All travelling Sibelco employees are insured, covering all major risk including emergency healthcare. Special action is required to obtain insurance for high or very high risk countries (refer to Annex 1).
- Travelling to a country with a high (level 4) or very high (level 5) security threat level (as per www.crisisresponse.info/ - username: Sibelco11, password: HccUnity11), must be clearly stipulated on the Travel Request Form and the travel must be approved by at least one member of the ExCo. Travel to a country with high or very high security threat level requires special measures as per Annex 1 to this policy.
- The use of black listed airlines is prohibited (as per the "EU Air Safety List" (http://ec.europa.eu/transport/modes/air/safety/air-ban/search_en)).
- Single engine aeroplanes and chartered aircraft must only be used with written approval of an ExCo member.
- The use of unlicensed hotels or taxis is prohibited.
- The traveller must ensure that the Travel Coordinator/HR has up-to-date next of kin contact details in case of an emergency.
- Large groups of Sibelco Managers travelling together should be avoided.

4. Procedure

4.1 Travel Approval Process

Travel should only be considered when absolutely essential. In an effort to reduce travel costs, videoconferencing or teleconferencing should be strongly considered over travel wherever possible.

- Before leaving on a business trip, the employee must obtain formal approval from their direct supervisor. This must be done using a 'Travel Request Form' which can be a paper or electronic process from which an auditable record is maintained.
- To be valid, the Travel Request must specify the duration, purpose and estimated cost of the trip.
- Long haul travel requires the approval of an ExCo member.
- Combining personal and business travel requires advance written approval by the direct supervisor.
- If the traveller (e.g. a temporary contractor or consultant) is not listed electronically in the Travel Request system, a Travel Request can be made in the name of the Travel Coordinator with the name of the external traveller and travel purpose recorded on the travel request form.
- Sibelco funds must not be used for securing travel and accommodation upgrades.

4.2 Bookings

All travel reservations must be made by designated Travel Coordinators or approved travel agencies (not directly by the traveller). The exception to this rule is the booking of "low cost" carriers if the only option is for the traveller to directly book and pay with a credit card. These exceptional bookings may only be made with an accompanying approved Travel Request.

- The Travel Coordinator / Travel Agency will only make the booking following receipt of a completed and approved Travel Request Form.
- Employees may freely dispose of non-cash advantages gained from frequent flyer or similar programs. However, this must not encourage the traveller to select a more expensive carrier/hotel to accrue points.

The following rules apply to reservations:

Air Travel

- Air travel should be booked well in advance for maximum choice and favourable prices. In practice this normally means booking at least two weeks before the departure date for short haul flights and one month prior to intercontinental and long haul travel.
- Economy class is the default travel class for Sibelco employees.
- **Business class & Premium Economy Travel:**
 - Business Class may be approved by ExCo members for intercontinental and long haul flights where the total in-flight time will exceed 8 hours.
 - Requests for business class travel for legs exceeding 6 hours may be approved in special circumstances (e.g. attending a meeting immediately upon arrival) at the discretion of an ExCo member.
 - An employee may be requested to use premium economy where a suitable option exists.

Accommodation

- Hotel reservations shall be made at hotels approved by the company.
- Hotels are arranged by the Travel Coordinator/Travel agency of the hosting location.

Ground transportation and car rental

- Whether or not a Travel Request Form is needed when an employee travels by private or company car (and no hotel accommodation is involved), is at the discretion of the direct supervisor. This matter is to be clarified prior to travel.
- It is recommended that transfers are arranged by the Travel Coordinator/Travel agency of the hosting location.
- Car Rental must be booked by Travel Coordinator/Travel agency or local preferred car rental company.
- Economy class is the default travel class for train bookings.

4.3 Expense Reimbursement

- Every employee, travelling on behalf of the company, has the responsibility to keep their travelling expenses as low as possible.
- Travel expenses shall be approved by the line manager. The line manager can delegate the approval authority to local management.
- If multiple Sibelco employees dine together the most senior employee must pay for and report the cost, unless the group is hosted by the local Sibelco entity. In this case, the most senior attending employee of the local organization should pay and report the cost. This is for hospitality/tax reasons.
- The Names of each participating individual, and the name of their company must be reported in these expense claims.
- All travel costs must be fully supported by VAT receipts and bills for tax documentation and maximum VAT recovery. Only exceptionally small travel costs without proper documentation can be reimbursed.
- All travel expenses are to be submitted in a timely manner, no later than one month after the expenses were incurred.
- The approver of travel expenses is responsible for checking that all costs are justified, reasonable and properly documented. With the exception that the checking of documentation may be delegated to Finance as part of an electronic system.
- A company credit card is the preferred form of paying for travel expenses.
- For advance guarantees etc. the card holder should never share credit card information via email. Preference must always be given to controlled payment systems (provided by various operations e.g. PayPal). Accounts with controlled payment systems must always be established in the card holder's name and use the card holder's email address. i.e. a PayPal account cannot be controlled by any person other than the named card holder.
- Employees must not withdraw cash using a company credit card, except modest amounts where required to enable a credit card to operate.
- A company credit card must not be used to pay private expenses.
- When given an option to pay in local currency or in home currency, the local currency should always be selected.
- When travelling outside the region of residence the, traveller must confirm with the credit card issuer that the credit card is active and sufficient credit is available.

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Annex 1

Measures to take for travel to countries with a high or very high security threat level.

It is the responsibility of every Sibelco Business Traveller, Travel Coordinator, Approving Manager, in this order, to check the security threat level associated with the destination countries of a given journey.

When a destination country (or city) is classified as high risk or very high risk, it is the responsibility of the Sibelco Business Traveller and of his/her direct Manager to be sure that enough information, instruction and guidance has been given before departure.

- All individuals embarking on a business trip to destinations with a high or very high security threat level should prepare for this and be well informed with regard to the types of risks which exist at the destination and how to avoid them and protect themselves. This includes:
 - Before travelling register your travel and contact details with the local Sibelco Operation and where Sibelco has no representation your embassy or consulate.
 - Before travelling, check with a health professional that you have had all the necessary vaccinations.
 - Know the local laws (including what you can take into the country) and obey them, even if they appear unreasonable, petty or harsh compared with your country of origin.
 - Make copies of your passport details, insurance policy, visas and credit card numbers. Carry one copy in a separate place to the originals and leave a copy with someone at home or in your hotel.
 - Keep at least one credit or debit card and some reserve cash in your hotel safe, and try to avoid carrying large denominations of cash in your wallet.
 - If confronted by criminals always comply with their demands to hand over any valuables and do not give them any cause to resort to violence.
 - Do not stand out. Try to dress and behave neatly and modestly, or in such a way that will help you blend in and not cause offense. Avoid revealing and bright clothing, and clothing with logos and slogans.
 - Always be aware of your surroundings by observing what goes on around you. Try to recognise what is normal, so that you may be able to identify anything that is unusual or out of place that may indicate danger. Trust your instincts.
 - Have an emergency plan in place. Know where your safe locations are and who you would contact for immediate assistance.
- The Business Traveller should be assigned a Contact Person in Sibelco who should be aware of the full itinerary of the Business Traveller. The Business Traveller should take the necessary actions to inform the contact person at all times about his/her itinerary and any unforeseen changes. He/she should be sure to get in contact with the contact person at least once in every 24 hours, including during the weekend.
- Appropriate and adequate insurance must be secured before undertaking international travel to High Risk areas. Employees should consult with the Group Risk Manager to determine if additional coverage is required for such travel.
- An emergency situation occurs when the physical integrity of the person is in danger as result of threat from the others, diseases, accidents, etc. In case of an emergency situation, the Sibelco Contact Person should be immediately informed.
- An emergency situation also occurs in case the contact with the business traveller is lost for more than 48 hours. It is the responsibility of the Sibelco contact person to try to get in contact with the business traveller after 24 hours of lost communication.
- In case of an emergency situation, the Sibelco contact person should directly inform the Group Risk Manager who will further take all the necessary steps to try to solve the problem.

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