

1 Scope

1.1 This Policy shall be used as a guide by all supervisors and employees authorized to approve employee travel and entertainment expense reports and the expenditure of such funds at iClick Group and its related entities. Furthermore, this Policy provides guidance to all employees regarding their obligations and responsibilities in connection with the expenditure of Company funds including the requirement that they properly obtain approval for, record, and document all such expenditures. Although this policy sets forth limits and approval processes, it does not replace each employee's duty to always use good judgment and common sense to ensure that their business travel and entertainment activities, and other expenditures, on behalf of the Company are reasonable and appropriate under the given circumstances.

2 General Principles

2.1

All iClick personnel worldwide who incur travel and entertainment, and/or who are responsible for approving such expenditures, must adhere to the policies and procedures set forth herein. Any expenditures of a purely personal nature, regardless of whether incurred while traveling on or otherwise engaged in business, are not authorized for reimbursement.

Any and all exceptions to this Policy must be pre-approved in writing by both Head of Finance and CEO. In all cases, the employee seeking an exception to this Policy is personally responsible for obtaining this written pre-approval.

2.2 Approval: applied to all except employees with package limit pre-approved by Sammy

Total expense claims	Approval required:
Below HKD3,000 or other currency equivalent	BU/Function head
HKD3,000 to HKD10,000 or other currency equivalent	Second approval from either head of finance or Selina
Above HKD10,000 or other currency equivalent	Second approval from CEO
With missing receipts	Second approval from site Finance manager

If necessary, BU/Function head can authorize Department head (Job grade M2 & above) to make approval for expense claims below HKD3000 or equivalent; regarding job grade, please consult HR team when in doubt.

2.3 Submission Schedule: by following local policy requirement for each office location.

2.4 Expense claim form to be submitted: by following required standard templates for each office location.

2.5 All expenses must be supported by **original receipts**.

2.6 It is the Company's policy that no cash advances are given for travel, entertainment and

related business expenses.

2.7 For purchase of items **NOT** stated in this policy, pre-approval by complying with company approval matrix is required; amounts exceeding approved budget will require Sammy's pre-approval, including:

2.7.1 Capital expenditure: e.g. computer hardware, software and licenses.

2.7.2 Sales-related expenditure: e.g. promotion gifts and coupons.

2.7.3 Marketing expenditure.

2.7.4 Training and team building related

Please consult Finance team when in doubt.

3 Overseas expense claims

3.1 All overseas business trips must be pre-approved in writing by CEO

Employees should find the most economical method (e.g. use of Skype for conference) before requesting business trip. BU heads are responsible for justifying the necessity of trip arrangements and eliminating related costs.

3.2 Expenses incurred in overseas business trips:

Expense type	Policy
Accommodation	<ul style="list-style-type: none"> Accommodation bookings could be done by either employees or Admin personnel. All reimbursements based on the "LOWER of the actual or approved upper limit". (Refer to the limit of daily room charge by locations in the appendix below.) For locations not listed in the appendix, pre-approval by Head of Finance is required before booking. Extra costs of room upgrades are NOT reimbursable. All ancillary services available at the hotel and included on the hotel bill, including but not limited to such services as shoe shine, movies, fitness centers, mini bars, etc. are not reimbursable. Exceptions to the above require pre-approval in written by both Head of Finance and CEO.
Airfare	<ul style="list-style-type: none"> Except employees with <u>job grade IC7/M4 and above</u>, all flight bookings MUST be through travel agents; otherwise the expense claim will not be reimbursed. All employees will be ticketed for travel in Standard Economy Class. Extra costs associated with upgrades are NOT reimbursable; employees must attach qualified supporting document for air ticket cost of economy class when making expense claim. Extra costs associated with change in flight schedule,

Expense type	Policy
	cancellation or lost ticket are borne by the employee without CEO's pre-approval.
IDD / Roaming	<ul style="list-style-type: none"> Reimbursable for business calls. Employees should use the most economical method whenever appropriate (e.g. use of Skype for conference).
Laundry	<ul style="list-style-type: none"> Laundry expenses during business travel that include reasonable laundry, dry cleaning and pressing services will be reimbursed for overseas trips exceeding 5 consecutive days.
Meals	<ul style="list-style-type: none"> Maximum HKD 150 or other currency equivalent per day per head is reimbursable (except for day trip).
Transport	<ul style="list-style-type: none"> Employees are expected to use the most economical and reasonable mode for transportation to and from the airport. Transportation fees for travelling between hotel and business meeting locations are reimbursable. The Company will reimburse for any public transportation / taxis provided that tickets or receipts are completely accounted for on the expense report.
Travel insurance	<ul style="list-style-type: none"> Travel insurance purchased by employees for additional coverage is NOT reimbursable.
Passport	<ul style="list-style-type: none"> Only costs incurred due to regulations or Customs requirements are reimbursable. Employees must check passport / 港澳居民來往內地通行證 (a.k.a. 回鄉卡) validity before travel. Any costs on related application or renewal are not reimbursable without pre-approval by site HR/Admin manager.

3.3 Foreign currency transactions: based on actual rates on credit card bills or FX swap forms; if without supporting records, will be referring to the monthly exchange rates from Finance system.

3.4 Personal extended trip: An employee may choose to extend the business trip for personal travel. Any expenses incurred during personal extended trip are not reimbursable. If the total airfare exceeds the would-be airfare for the business trip, the employee has to pay for the extra cost involved.

4 Local expense claims

Expense type	Policy
Business Meal & Entertainment	<ul style="list-style-type: none"> It's BU/Function heads' responsibility to manage actual spending and ensure no excess of each quarterly budget approved by CEO. No reimbursement will be made for any

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Expense type	Policy
	<p>excess of budget and violation of the policy.</p> <ul style="list-style-type: none"> The following must be provided for business meal and entertainment expenses: <ul style="list-style-type: none"> Number of attendees; Name and company of all attendees (external and internal). In case more than one employee attends a business meal or entertainment event, <u>the senior employee will pay the bill</u>, i.e. the senior or higher ranking employee cannot approve the expenses paid by his/her subordinates for business meal and/or entertainment event that he/she also attends.
Gift / Sponsorship to clients	To comply with approved local policies
Ground transportation	<ul style="list-style-type: none"> Taxi and public transportations for travelling for business purposes are allowed.
Local mobile	<ul style="list-style-type: none"> Employees on approved eligible list can claim mobile expense reimbursement for business purpose. The eligible list is prepared by HR and needs to be approved by both Head of Finance and CEO in advance.
Stationery / Office equipment	<ul style="list-style-type: none"> Stationery / office equipment purchases are to be coordinated centrally by Admin team. Not reimbursable without pre-approval by head of Admin.
Overtime Work	<ul style="list-style-type: none"> By following approved local policies for different office locations.

[Appendix] Limit of daily room charge

Location	Job grade IC5/M2 and above	Other employees
Beijing	RMB 700	RMB 400
Shanghai	RMB 700	RMB 400
ShenZhen	RMB 700	RMB 400
GuangZhou	RMB 700	RMB 400
Other CN cities	RMB 600	RMB 350
Hong Kong	HKD850	HKD 650
Singapore	SGD 180	SGD 140