

Travel Policy

Effective Date: March 2019

Purpose

The ANA Enterprise (“ANA”) would like business travel to be effortless, efficient, and cost-effective. ANA Employees and Volunteers, including Board Members (“Travelers”), should abide by the following guidelines when making their travel plans:

- Apply common sense and good business judgment.
- Take the time to understand the policies and procedures before arranging travel.
- Ensure all expenses are ANA business related.
- Utilize the approved ANA travel vendor.
- If in doubt, ask.
- For ANA employees, also follow the policies for management and confidential employees; and for union employees, also follow the ANA-WBNG Collective Bargaining Agreement currently in force.

Unless otherwise noted, this document establishes policies and procedures for all ANA travelers incurring business travel and entertainment expenses on behalf of ANA. It outlines acceptable methods for booking travel, including hotel arrangements. It defines allowable expense limits for meals and other expenses, and specifies which expenses are and are not reimbursable.

ANA employees should also refer to related policies and procedures governing travel, gifts and entertainment contained in the ANA Enterprise Code of Ethical Conduct and Corporate Compliance Program (“Code of Conduct”), to familiarize and ensure compliance before accepting gifts, entertainment or travel paid for by others, and before offering gifts, entertainment or travel to anyone who is not covered by this Policy.

Scope

This Policy applies to ANA Employees, and Volunteers including Board Members (“Traveler(s)”) traveling on ANA related business. This Policy applies in all instances where travel has been authorized by ANA, including airline, train, rental cars and lodging.

ANA Employees seeking to travel on ANA-related business must obtain authorization to travel from and be approved by the responsible supervisor with signatory authority as outlined in the ANA Enterprise Delegation Policy (“Delegation Policy”). Employees who do not comply with this Policy may be subject to a delay or denial of reimbursement; management notification; and/or disciplinary action, up to and including termination.

All International Travelers for ANA-related business must also register their trips with the ANA Office of General Counsel. For additional information and details pertaining to travel outside the United States, please read the “International Travel SOP” and/or consult with the Office of General Counsel as necessary.

ANA Employee, Board President and Board Chair Travel Restrictions

The frequency of air travel will, on occasion, create situations where several Employees and/or Board Chairs may be scheduled for the same flight. To minimize the loss to ANA should a single incident occur,

the following restrictions regarding joint employee travel should be observed:

- When multiple Travelers are traveling to the same destination, the number of Travelers together on the same flight should not exceed two executives or four non-executive travelers.
- Board Presidents, Board Chairs, Chief Executive Officer, Chief Nursing Officer, Chief Operating Officer, Chief Financial Officer, and Chief Legal Officer should consider not traveling together on the same flight.

ANA Approved Travel Provider

ANA’s approved travel vendor, Direct Travel, can provide full-service travel support for all Travelers via their online platform. The online platform has been configured to assist the Traveler with making reservations in alignment with the Policy. This online platform saves ANA money in ticketing and service fees and gives the Traveler flexibility in making their reservations.

All Travelers **must** utilize the vendor’s online platform to make airline, train, rental car and lodging reservations when traveling on ANA-related business. ANA will not reimburse for airline, train or rental care expenses booked outside of the vendor’s online platform, unless the travel falls under the following qualifying circumstances outlined in this Policy.

Travelers are permitted to call ANA’s travel vendor directly (at higher fees to ANA) rather than use the online platform under the following qualifying circumstances:

- Flight cancelation or flight delays that cause the Traveler to miss a connecting flight;
- Airline strike;
- Changes in travel required for business reasons;
- Complicated itineraries that include multiple airlines, multiple international cities, or more than three domestic cities; and
- For ANA employees, changes in travel required by the Traveler’s personal emergency, which has been reported to the Traveler’s supervisor

Flight Reservations

The Traveler will be given available travel options, ordered by lowest price and around the preferred times of travel. Consistent with the objectives of the trip, Travelers are expected to select the most economical airfare available.

Book in Advance: It is expected that tickets will be booked as far in advance as possible (14 days is best) and changes should be avoided. ANA’s vendor will offer flights leaving up to two hours before and after the requested departure times. Travelers are expected to take the less expensive flight if savings represent \$100 or more. Travelers who do not select the less expensive flight will be required to provide business justification. For example, if the Traveler has business appointments on the day of travel.

Non-stops vs. single stop: If available at cost savings of \$100 or more, the ANA vendor will suggest flights including a scheduled layover not exceeding two hours. If the extra time in transit does not interrupt scheduled meetings for the day, the Traveler is to accept such minor delays in exchange for the lower airfare. While flights with more than one stop may be offered, it is not required to accept a flight with more than one stop.

Class of Service: All travel should be at the lowest class available. This usually means non-refundable tickets. ANA will not pay for first class travel. Seat upgrades or preferred seating fees are not reimbursable, unless medically necessary and with prior approval and documentation. For flights longer

than six hours, one upgrade in class of service will be reimbursed.

Travelers will not travel on ANA-related business as the pilot or passenger in a private aircraft.

Tickets over \$650: Tickets over \$650 require approval and will be automatically flagged and routed for approval by the ANA vendor. Travelers should not request approvals directly with the vendor. At its discretion, ANA may require Travelers to utilize canceled tickets, credits, and corporate travel rewards for tickets over \$650, and for any other ANA business-related expense.

Alternative Airports: The least expensive airport within a 60-mile radius should be used when the overall savings, including the difference in airfare, local travel, and parking is greater than \$200.

Rebooking Fees: Rebooking, penalties or change fees incurred by Travelers for personal reasons are the expense of the individual Traveler. The Traveler is responsible for reimbursing ANA unless:

- The fees and costs are the result of ANA-related business or circumstances beyond the Traveler's control, including weather delays; or
- The change in travel will result in overall savings to ANA; or
- An emergency arises, and ANA waives reimbursement.

Baggage Charges: When the airline imposes a baggage fee for checked luggage, ANA will reimburse for up to two bags. Travelers will be reimbursed for additional or excessive weight baggage charges when they are traveling with heavy or bulky materials or equipment necessary for business.

Lost Luggage: Lost luggage is the responsibility of the airline and procedures for filing claims should be followed. ANA is not responsible for loss or damage to personal items.

For ANA employees, if ANA property is lost in travel, please notify the Office of General Counsel immediately so that an insurance claim can be made, if appropriate.

Frequent Flyer Programs: Travelers may not select travel contrary to ANA's Travel Policies and Procedures for obtaining or maximizing personal travel loyalty rewards or for other personal reasons. For ANA employees, travel selections for such reasons may constitute a violation of the Code of Conduct.

Personal frequent flyer mileage or similar rewards can be used by the Traveler to upgrade transportation and lodging, provided there is no additional cost to ANA. Personal frequent flyer miles and other personal rewards earned while traveling on ANA business are the property of the Traveler. ANA does not pay for airline club memberships.

Refunds/Unused Tickets: Unused, non-refundable tickets are credited to the Traveler's personal frequent flyer account at the airline. Unused tickets paid for by ANA are not to be used for personal travel unless the Traveler reimburses ANA. The Traveler must use them as quickly as possible so that they do not expire prior to use.

Personal Travel: Travelers who wish to extend their stay beyond the time required for ANA-related business or to add personal travel onto their business ticket must book the business and personal travel at the same time through the ANA vendor so the cost of the business portion of the trip can be accurately determined. Travelers will be responsible for any additional costs associated with personal legs of a trip. Personal travel is not covered by ANA's insurance.

Travel Companions: Travel for spouse or other significant others is not the responsibility of ANA. This includes all transportation and lodging. Companion travel expenses will not be reimbursed.

Alternatives to Flying: Traveling by plane is usually the most convenient and cost-effective manner. ANA will reimburse Travelers for travel costs up to the cost of traveling by plane. Therefore, if a Traveler elects to drive instead of fly, he/she will be reimbursed for the lesser of the travel based on the IRS mileage rate, or the flight. Likewise, if the Traveler takes a train, he/she will be reimbursed the lesser of the cost of the train ticket or the flight.

Parking / Shuttle Transportation: When traveling to and from airports or meeting venues, Travelers should choose the best balance between cost and personal convenience. Depending upon the length of trip, it may make more sense to take a shuttle or cab to the destination to avoid parking costs for the duration of the trip.

For some meetings at the ANA headquarters office, ANA will arrange for shuttle service. This information will be included in the meeting information.

Travel and Accident Insurance

ANA's insurance policies cover Travelers while traveling on ANA-related business, except when traveling in an aircraft operated, owned or leased by the Traveler or in other noncommercial aircraft. Personal excursions (frolics and detours) during, immediately before, and immediately after business trips, are not covered by ANA's insurance policies. Insurance purchased by the Traveler for personal legs related to a business trip will not be reimbursed.

Hotel Reservations

Lodging: Lodging needed during ANA-related business travel must be booked through the ANA vendor. Travelers should use hotels that are efficient, provide the level of amenities necessary to support the purpose of the trip, and are economical. The daily cost of lodging is a reimbursable expense at the single-occupancy room rate, plus applicable taxes. Whenever possible, hotels should be booked using the lowest price available in that location. Any personal affinity points earned when a Traveler stays in a hotel are the property of the Traveler.

ANA Conferences and Meetings: If lodging is part of an ANA-sponsored meeting (e.g., ANA Conference, ANA Membership Assembly Meeting, ANCC National Magnet Conference[®], etc.), staff and volunteer hotel reservations will be made through the Conference & Meeting Services Department. Check with your supervisor or staff liaison for the proper procedure. The Traveler is then responsible for any incidental charges that exceed the per diem.

Travelers who attend conferences organized by organizations other than ANA should register in a timely manner. They should book their travel and accommodations utilizing the negotiated rate for that conference or through the ANA vendor, considering both savings and business needs.

Rental Car Reservations

Reservations: Rental cars are to be reserved through the ANA vendor. The least expensive option based on the Traveler's needs and requirements will be reserved. Any upgrade will be the responsibility of the Traveler. Travelers should fill gas tanks prior to returning rental cars to avoid rental agency surcharges, which will not be reimbursed. Travelers should decline insurance offered by rental car companies, as ANA's insurance policies provide coverage for rental cars used during ANA-related business.

Unallowable costs: Travelers will not be reimbursed for traffic tickets or towing charges incurred while driving on ANA-related business. Mileage reimbursement is not applicable to rental cars.

Meals and Incidental Expenses (M&IE)

Meals while on travel are reimbursed using the current General Services Administration (GSA) per diem rates¹. This eliminates the need to track and provide receipts for meal and incidental costs. These federal rules set forth either a standard per diem rate for the entire US, or a location specific amount as set forth in the GSA regulations. Location specific rates will vary during the year based on the date of travel.

The standard 2019 CONUS allowance is \$55 for meals. It is set forth as follows:

M&IE Total	Continental Breakfast/ Breakfast	Lunch	Dinner	Incidental Expenses	First & Last Day of Travel
\$55	\$13	\$14	\$23	\$5	\$41.25

The federal rules require that the per diem allowed be reduced for meals provided during travel by deducting the appropriate amount shown at www.gsa.gov/mie for travel within the continental United States. There is also a chart for meal deductions for foreign travel and travel outside of the United States, (and specific rules for per diem allowances over \$265.²) The charts break down the amount of the per diem that represents the meal provided. This includes meals provided when attending a conference. The total amount of deductions made will not cause the traveler to receive less than the amount allowed for incidental expenses.

For example, if a traveler is using the standard rate on a day that is 100% reimbursable, and breakfast is provided, then the per diem allowance is $\$55 - 13 = \42 .

The first and last day of a business trip is reimbursed at 75% of the current GSA standard per diem rate for meals and incidentals. For meals provided on the day of departure and the last day of travel, you must deduct the entire allocated meal cost from the decreased M&IE rate.³

On a travel day in the example above, with breakfast provided, the standard per diem allowance would be $\$41.25 - \$13 = \$28.25$.

Union employees on travel for six or more consecutive days will receive an additional ten dollars (\$10) per day retroactive to the first day. This extra allowance is fully taxable and will be reported on the employee’s payroll as wages.

¹ GSA Travel Regulations §301-11.18 Per Diem Expenses, 5 U.S.C. 5707 Subpart A.

² For M&IE rates greater than \$265, the per diem allowance by meal is allocated 15%, 25%, and 40% of the total to breakfast, lunch, and dinner, respectively. The remainder is the incidental expense allowance.

³ GSA Travel Regulation §301-11.101

Other Travel Related Items

American Nurses Foundation Board travel will be reimbursed up to \$300 per board meeting unless specifically required to attend a meeting. Foundation Board are not required to have preauthorization and are not limited to using ANA's travel provider or GSA standard per diem.

ANA requires that expense reports be submitted in a timely manner, preferably within two weeks of travel. Expenses that are not submitted for reimbursement within 60 days of the travel end date will not be reimbursed.

ANA Employee Business Meal Expenses – Actual Cost

In some circumstances, ANA may host business meals. All ANA-hosted meals and events must be approved by a supervisor with appropriate signatory authority under the Delegation Policy. Employees who host approved meals or events will be reimbursed for reasonable meals and entertainment expenses paid for by the employee who is hosting the official ANA business.

ANA Employee Auto Mileage Reimbursement

The current IRS rate per mile is reimbursable when using a personal automobile for ANA-related business travel. The calculation for local travel reimbursement is the excess mileage above and beyond your normal home to office commute. Other costs incurred when using a personal automobile such as gas, insurance, repairs and maintenance will not be reimbursed.