



AHEAD OF WHAT'S POSSIBLE™

U.S. Business Travel & Entertainment Policy

1.0 Introduction

1.1 General

This document provides guidelines for all U.S.-based Analog Devices, Inc. (ADI) employees incurring business travel and entertainment expenses on behalf of the company. When claiming reimbursement, it is expected that employees will neither gain nor lose financially for travel expenses.

The cost of conducting business travel is a significant controllable expense for ADI. Whether traveling to visit suppliers or clients, attend trade shows or training sessions, or for internal, office-to-office travel, it is vital for ADI to manage, measure and leverage these expenses as much as possible while supporting the business objectives of its traveling employees. It is our goal to:

- Drive savings and strike the most efficient, cost-effective balance of cost & service
- Standardize global policies & procedures
- Track, locate & assist travelers throughout their journeys
- Deliver data for management & budgetary reporting and vendor negotiations

1.2 Employee & Manager Responsibilities

Each employee and manager of ADI has stewardship responsibility for managing travel expenses. In particular:

- All employees are responsible for reading, understanding and complying with this policy and any additional related guidelines established by their specific group.
- All managers and approvers are responsible for reviewing their employees' travel itineraries and expense reports for accuracy and compliance to policy.
- The Accounts Payable Department will review expense reports to ensure the employee has submitted the appropriate documentation in support of such expenses and verify the expense report is completed correctly prior to reimbursement.
- American Express Business Travel Services is responsible for booking travel arrangements according to the guidelines of this policy and for tracking and reporting any deviation from policy, including the number of employees traveling together.

1.3 Business Travel Website & Support

[Click here](#) to be directed to the Business Travel website on the Signals Intranet homepage for information on ADI's managed travel program.

1.4 Application of Policy

Except for section 6.5, ADI's Board of Directors, President, CEO and Executive Officers are excluded from this Business Travel & Entertainment Policy. ADI's Board of Directors, President, CEO and Executive Officers are expected to demonstrate financial prudence when incurring business travel expenses and to comply with all applicable legal and ethical guidelines, such as those found in the Code of Business Conduct & Ethics and the Guidelines for Gifts, Meals, Travel and Entertainment, and submit expense reports in a timely fashion.

2.0 Alternatives to Travel

ADI invests in videoconference and teleconference technologies that can serve as an alternative and supplement to travel. Before booking travel, please take the time to understand and consider these alternatives.

3.0 Business Travel Approval

Employees must obtain authorization for all business travel prior to purchasing travel.

- Employees should speak with their manager to understand the business travel approval process for their respective department, and managers should review their employees' itineraries and expense reports for accuracy and compliance to policy.
- Managers will receive an email with itinerary and cost details for each booking made by a direct report.

4.0 Payment Methods

4.1 Corporate Card

ADI has selected American Express as its corporate card provider. The corporate card program provides a simplified process of paying for business travel costs, data for vendor negotiations and policy compliance, efficiencies through the pre-population of card charges into the Concur expense management solution and valuable financial incentives.

All business travel expenditures must be charged to a corporate card unless American Express is not accepted. If American Express is not accepted, an alternative form of payment may be used. Alternative forms of payment are highly discouraged and subject to audit.

To request a corporate card, please send an email to corpcardteam@analog.com with the following information:

- Brief business reason for requesting a U.S. corporate card
- Complete billing address (home or work)
- Employee ID number

Corporate card activity will be closely monitored to ensure compliance to policy. Employees defaulting on corporate card balances may be subject to termination.

4.2 Personal Use of Corporate Card

Personal expenses are not allowed on the corporate card unless they are incidental and incurred during business travel. For example, an incidental personal charge would include non-reimbursable items purchased from a hotel such as movie rentals. As personal expenses are not reimbursable, it is the cardholder's responsibility to pay these charges in full.

4.3 Corporate Card Billing and Payment Responsibility

Business travel expenses should be submitted for approval and payment within thirty days of incurrence to avoid corporate card delinquency fees. If business travel expenses are submitted more than 180 days after being incurred, additional approval by a Vice President or higher will be required.

When approved for payment, ADI will pay American Express directly for expenses charged to the corporate card and will reimburse non-corporate card/out-of-pocket expenses directly to the employee via electronic funds transfer. It is the responsibility of corporate cardholders to review billing statements to ensure proper account management. Delinquency fees and finance charges are considered non-reimbursable.

Corporate cards accounts can be managed online using the American Express @Work website.

4.4 Travel Advances

Temporary cash advances may occasionally be made to employees for whom business travel plans or other business-related expenses have been approved, if there are no previous temporary cash advances outstanding for the employee, and an authorized form is submitted. Please contact Accounts Payable for details.

4.5 Business Travel Account

The BTA (Business Travel Account) is a centrally-billed account available to non-ADI employees such as candidates, guests, etc., for approved business travel expenses. Access to the BTA is available upon request through the GBT booking resources.

5.0 Booking Business Travel

5.1 Reservation Procedures

All business travel must be booked through ADI business travel resources. Airfare, hotel, and car rental booked outside ADI's business travel resources is subject to review and may not be reimbursed.

Reservations made through alternate sources are prohibited due to the lack of access to ADI's negotiated vendor agreements, loss of data used for vendor negotiations and policy compliance, and the inability to track, locate and assist traveling employees. Personal travel may not be booked through ADI business travel resources. When personal travel is combined with business travel, the traveler will only be reimbursed for the business portion.

For U.S.-domestic business travel, access the Concur online booking tool. For international business travel, contact the ADI-dedicated American Express Global Business Travel (GBT) team at ADI internal extension 6500-3200 or (646) 817-9722, or aditravel@GBTgbt.com from 8:30am - 5:30pm EST, Monday – Friday.

- All changes to plans or itinerary while enroute must be made through American Express Global Business Travel resources as provided on the traveler's itinerary.
- For business travel support while overseas call (646) 817-9722.

5.2 Traveler Profiles

All business travelers are required to maintain an up-to-date traveler profile in Concur, which should be reviewed prior to booking any business travel. It is critical that business travelers use the same naming convention in their travel profile as on the identification to be used while traveling.

5.3 Passports and Travel Documents

It is the traveler's responsibility to ensure required travel documentation is current and on-hand during travel. Passports should be renewed before they have six months or less expiration. Passport, visa and other travel document costs are reimbursable if required for business travel purposes.

6.0 Air Travel

6.1 Airline Class of Service

- Economy is the allowable class of service when the cumulative scheduled flight time is less than ten hours.
- Business is the allowable class of service when the cumulative scheduled flight is ten hours or more. Flight time excludes time spent on the ground during layovers while making connections.
- Vice Presidents may travel Business Class when the cumulative scheduled flight time is less than ten hours.

- Travel for internal purposes with a cumulative scheduled flight time of ten hours or more must be booked at least three weeks prior to departure to qualify for Business Class.

6.2 Airline Selection

- Business travelers must purchase airfare from that provides the most cost-effective solution in keeping with policy. Membership in or level of an airline's frequent flyer program should not be factor in the selection of carriers.
- ADI has contractual agreements with several airlines. These agreements are strategically reviewed to help ensure full leverage of ADI's spend. While these contracts reduce the cost of our aggregate spend, on occasion they may not ensure that any given fare will be less than widely-available market prices.

6.3 Advance Airfare Purchases

Airfare should be purchased as far in advance of departure as possible. Generally, airfare purchased three weeks or prior to departure will ensure lower costs.

6.4 Lowest Airfare Definition

Travelers are suggested to book the lowest logical airfare, determined using the following search criteria:

- Routing requires no more than one additional interim stop each way.
- Departure/arrival must be no more than one hour before and one hour after the requested time.
- Travelers may fly non-stop over a lower-priced, connecting flight, provided that the additional cost is less than \$100 per direction.
- One-stop and single connection flights are treated the same as non-stops for fare calculations and lowest fare identification.

6.5 Number of Employees Traveling Together

To support our business continuity plans, no more than twenty employees, including no more than four Vice Presidents (with no more than three Senior Vice Presidents included in that number), may travel together on a single aircraft.

6.6 Upgrades for Air Travel

Upgrades at the expense of ADI are not permitted. Employees are not permitted to book air travel at a higher fare to use frequent flyer program privileges when a lower non-restrictive fare exists on the same flight.

6.7 Airline Frequent Flyer Programs

- Participation in a frequent flyer program must not influence flight selection that would result in incremental cost to ADI beyond the lowest available airfare, as required by this policy.
- The traveler is responsible for the record keeping, redemption and income tax implications of program rewards; ADI will not intervene to resolve any frequent flyer program concerns, issues, etc.
- Any membership costs associated with a frequent flyer program are not reimbursable.

6.8 Cancellations

Travelers are responsible for utilizing the ADI travel resources to cancel travel plans prior to departure date to retain the ability to reissue airline tickets and avoid hotel cancellation fees.

6.9 Airport Parking

The cost of taxi or limousine services to the airport should be considered as a cost-effective alternative to airport parking.

7.0 Lodging

7.1 Making Lodging Reservations

All lodging reservations must be made through our business travel resources.

- Employees are not permitted to make hotel reservations directly with the provider or online.
- Business travelers referred to special rates for conferences and other reasons should speak with GBT travel counselors to assist them in booking these rates.
- GBT will always reserve with a preferred hotel unless none are available for the requested time. If a preferred property is not available, GBT will locate an alternative in the same price category and quality of amenities.

7.2 Hotel Selection and Spending Guidelines

- Travelers are required to use ADI-negotiated rates at preferred hotels whenever possible.
- Travelers will be reimbursed for actual hotel room costs as charged on the final hotel invoice.
- Travelers should verify the hotel rate at check-in to avoid being overcharged.
- Non-preferred hotel properties can be used only if attending a professional conference where an event group room rate has been negotiated and the amount does not exceed the rates otherwise available at alternate properties.

7.3 Hotel Upgrades

Travelers are required to reserve standard rooms only. Travelers may accept room upgrades only if the upgrade is at no additional cost to ADI.

7.4 Hotel Cancellation Procedures

Travelers are responsible for cancelling hotel rooms at least 24 hours in advance of arrival through the GBT travel resources. Travelers should request and record the cancellation number in case of billing disputes. Note that cancellation deadlines vary by property.

7.5 Hotel Early Check-Out Procedures

If the traveler is required to check out earlier than stated on the reservation due to business requirements, any fee charged by the hotel for early check-out is reimbursable. The traveler should consult with the hotel to determine if an early check-out fee is applicable.

7.6 Hotel Frequent Guest Programs

Many hotels have frequent guest programs that reward travelers with free accommodations in exchange for a given number of paid room nights at the hotel. Travelers may retain awards from such programs for personal use. Participation in these programs must not influence hotel selection, which would result in incremental cost beyond an ADI - negotiated rate.

8.0 Car Rental

8.1 Preferred Rental Car Vendors

Hertz, National and Enterprise are the car rental providers with which ADI has negotiated rates. Because insurance is provided through our negotiated rates, employees must use one of these providers when renting a vehicle for company business.

8.2 Making Car Rental Reservations

All car rental reservations must be made through Concur or GBT travel counselors. GBT will always reserve with the preferred car rental vendor unless unavailable for the requested time. If the preferred car rental agency is unable to provide a reservation, GBT will locate an alternative in the same price category. Employees are not permitted to make reservations directly with the preferred supplier.

8.3 Car Rental Insurance

ADI self-insures the exposure to physical damage to the rented vehicle, and purchases liability insurance to cover financial liability for bodily injury and damage to property of others. Therefore, business travelers should decline the purchase of any additional liability or collision damage waiver insurance when renting vehicles for company business. This policy applies both domestically and internationally. The cost of repair resulting from any collision damage will be charged back to the employee's cost center.

Travelers should inspect the rental car for existing damage at time of rental, noting any on the contract before the vehicle is accepted.

8.4 Rental Car Size Guidelines

Intermediate cars are permitted for employees traveling alone or in a group of up to three employees, unless extenuating circumstances (e.g., medical, physical, etc.) dictate otherwise. Full size vehicles are permitted if the traveler is required to transport bulky equipment or more than three employees are traveling together in a single vehicle. Travelers may accept car rental upgrades only if there is no additional cost to ADI.

8.5 Refueling Rental Car Prior to Return

The rental vehicle must be returned with a full tank of gas to avoid refueling fees by the car rental company. The pre-paid fueling option must not be purchased.

8.6 Rental Car Accidents

Should an accident occur while driving a rental car, travelers must immediately contact local authorities as required and complete a car rental accident form with the rental company.

8.7 Traffic and Parking Violations

Traffic and parking violations while operating a rental vehicle or a personal vehicle for business purposes are not reimbursable.

9.0 Other Transportation

9.1 Personal Car Usage Guidelines

Employees may use their personal car for business purposes if it is less expensive than renting a car, taking a taxi or alternate transportation. It is the personal responsibility of the owner of a vehicle being used for business to carry adequate insurance coverage for their protection and for the protection of any passengers.

9.2 Reimbursement for Personal Car Usage

- Travelers will be reimbursed for business usage of personal cars at the rate of \$0.58 per mile for calendar year 2019.
- Personal mileage reimbursement is intended to cover the cost of fuel and normal wear and tear related to operation of the vehicle, including service, maintenance, insurance and depreciation.
- Mileage reimbursement excludes normal round trip to and from work.
- If an employee chooses the option to drive instead of fly, the reimbursement will not exceed the cost of an airline ticket at time of reservation request.

10.0 Spouse/Companion Accompaniment & Personal Travel

ADI will reimburse travel expenses incurred by a spouse or other individual accompanying an employee on business when:

- There is a bona fide business purpose and material and direct benefit to ADI for taking the spouse/companion, or
- The spouse/companion is not an ADI employee and is required to be in attendance, or
- ADI invites the spouse/companion to attend

The spouse/companion:

- Is subject to the same travel policy guidelines as the employee.
- May accompany an employee on a business trip at the employee's expense; ADI business travel resources cannot be used to book travel.

11.0 Meals & Entertainment

Individual Business Meals While Traveling

- Categorized as expenses for meals and groceries purchased away from the employee's home office while traveling on business. *Example: the cost of a Wilmington-based employee's dinner while traveling on business in San Jose.*
- Individual business meals must be categorized using the "Individual Meals" expense type in Concur. Meals with more than one individual in attendance must be categorized using the "Entertainment" expense type in Concur.
- Employees are expected to exercise discretion during business travel with regards to meals. To qualify as reimbursable, meal expenses, including food, beverages, taxes and tips, must be ordinary, reasonable and necessary. Individual business meals greater than \$100 require the approval of a Vice President or higher.

Customer & Supplier Meals and Entertainment Expenses

- Categorized as the cost of meals and entertainment of customers and suppliers at events such as sporting and cultural functions. ADI will not reimburse the cost of expensive bottles of wine or liquor. *Example: the cost of a Wilmington-based employee hosting clients for a meal at a local restaurant.*
- Customer entertainment expenditures must directly precede, include, or follow a substantial business discussion, and a business benefit must be expected to be derived from the entertainment.
- ADI will not reimburse for expenses that violate applicable law, the Code of Business Conduct and Ethics or the Guidelines for Gifts, Meals, Travel and Entertainment. Customer entertainment expenditures greater than \$100 per person, per event require the approval of a Vice President or higher.
- ADI prohibits entertainment at venues that could damage ADI's reputation if made public, including hostess clubs, adult-only dance clubs, and venues promoting promiscuous behavior. ADI will not reimburse employees for customer entertainment or other expenses that may be construed as showing improper influence, favoritism or extravagance.
- The names of those in attendance, including company affiliation and business relationship, must be listed when submitting the expense for reimbursement, using the "Entertainment" expense type in Concur.

Internal Entertainment Expenses

- Categorized as meals or social events with only ADI employees in attendance while not traveling away from the employee's home office or while hosting traveling employees. *Example: a Limerick-based manager hosting members of his staff for a holiday dinner at a local restaurant.*
- ADI will reimburse for reasonable internal entertainment expenses. Internal entertainment expenses greater than \$100 per person, per event require the approval of a Vice President or higher.
- When incurring internal entertainment expenses, the senior-most employee in attendance must pay.
- The names of those in attendance, including company affiliation and business relationship, must be listed when submitting the expense for reimbursement, using the "Entertainment" expense type in Concur.

12.0 Other Reimbursable Expenses

Type of Reimbursable Expense	Reimbursable Expense Examples
Charges	<ul style="list-style-type: none"> – Reasonable gratuities (15-20% for meals) – Reasonable expenses for attendance at business-related conferences and seminars – Business-related telephone charges, including cell phone and internet charges. – Recurring cell phone charges will not be reimbursed in locations where company mobile phone programs are in place (currently Ireland, Canada, Philippines and US) – Passport, visa and inoculation expenses for international business travel – Reasonable laundry costs while traveling – Reasonable costs associated with the replacement of clothing due to lost luggage while traveling – Personal telephone calls while employees are traveling for an extended period

13.0 Other Non-Reimbursable Expenses

Type of Non-Reimbursable Expense	Non-Reimbursable Expense Examples
Entertainment	<ul style="list-style-type: none"> – Personal entertainment (theater movies, sporting events, etc.) – Personal reading material (magazines, periodicals, books, etc.)
Fees, Fines & Charges	<ul style="list-style-type: none"> – Traffic or parking violations – Credit card delinquency fees & finance charges – Charges for guaranteed hotel reservations that are not cancelled in a timely manner – Service charges for home telephone/internet
Personal	<ul style="list-style-type: none"> – Lunch while on local projects – Excessive personal telephone calls – Prescription drugs, dietary supplements, and health & beauty products – Airline lounge & health club memberships – Weather-related items, such as umbrellas, overshoes, overcoats, etc. – Babysitters, house sitters, and kennel fees – Travel items such as briefcases and luggage – Political and charitable contributions – Unreasonable laundry expenses while traveling on company business – Costs for travel insurance exceeding the coverage provided by ADI – Lost baggage insurance in excess of the coverage provided by the corporate card – Car washes – Loss of personal property (clothes, household items, jewelry, etc.) – Personal grooming items, barber, hairstylist, shoeshine – Office decorations