



Table of Contents

Introduction and	4	International Travel	9
Basic Information		Passport and Visa Services	9
Policy Administration	4	Vaccinations	9
1 oney Administration	•	Currency Conversion	9
Business Travel	6	International Car Rental	9
Travel Authorization	6	Group Travel	9
Travel Approval	6	Travel Safety	9
Spouse/Companion/Family Travel	6	naro: Jaioty	
Tax Implications	6	Other Expense Reimbursement Guidelines	11
Travel Agencies	6	Rembursement duidennes	
Airline Travel	6	Meals and Entertainment	11
Class of Service	6	Other Reimbursable Expenses	11
Flight Itinerary Changes	7	Telephone/Fax Expense	11
Flights outside your home country	7	Continuing Education	11
Refunds for Unused Tickets	7	Electronics	11
Lost/Damaged Baggage	7	Non-Reimbursable Expenses	11
Personal Aircraft	7		
Hotels	7	Expense Payment and Reimbursement	12
Class of Hotel	7		
Upgrades	7	Corporate Credit Card Program	12
Cancellations	7	Payment Methods and Reimbursement	12
Ground Transportation	8	Receipts and Support	12
Rental Cars	8	Reimbursement	12
Airport/Hotel Shuttles	8	Normal actions.	
Public Transportation	8	Appendix A: North America	14
Taxi Service	8	Appendix B: Europe	14
Chauffeured Car Service	9		
Mileage Reimbursements	9	Appendix C: Asia Pac	15
		Appendix D: LATAM	15
		Appendix E: Travel Safety Guidelines	15

Introduction and Basic Information

The ADTRAN Global Business Travel Policy has been established to make sure all ADTRAN employees understand the rules associated with business travel expenses, and that those rules are uniform and clear.

This policy details how you should obtain travel services and how you should report the expenses incurred while traveling on behalf of ADTRAN. It applies to both employees and non-ADTRAN employees (contractors) who travel on ADTRAN business.

This revised policy is the only travel policy in effect, and should be used company-wide. Country-specific additions may be needed to comply with each country's legal, tax and fiscal requirements. Country-specific information is included in the Appendices. Rules do tend to change over time. If they do, you will be alerted, but you can be confident you have the latest policy if you go to the following location to download the most current ADTRAN Global Business Travel Policy: N:\Netdata\Work Instructions\TRL-Travel Policy\Global_Business_Travel_Policy.pdf

When you travel for ADTRAN, we want you to be comfortable and have a reasonable level of service at a reasonable cost. This document details the type of expenses that are reimbursable, and the procedures you need to follow to make sure you receive a timely reimbursement. This policy does not cover relocation or recruitment expense.

When you travel for ADTRAN, please remember that your actions are a reflection of our company values and culture. You are expected to conduct yourself in a manner that reflects positively on the company at all times and in all circumstances. It is your responsibility to use sound judgment, and to be aware and observe the ADTRAN Global Business Travel Policy. ADTRAN does not assume any liability or responsibility for any unsafe practices or activities performed by employees on a business trip.

This policy covers travel services and travel-related expenses. This policy does not cover business expenses for trade shows, booth rentals, mass entertainment events, etc. These expenses must be submitted and authorized through ADTRAN's purchase order system in advance of the events.

POLICY ADMINISTRATION

If you travel for ADTRAN, you are responsible for knowing and following this policy and for submitting expense reports in the manner described below.

It is your responsibility to submit accurate expense reports, including matching receipts, for review and approval by your supervisor in compliance with this policy. If you have questions regarding this policy, you should ask your supervisor or email your question to **expensereports@adtran.com**.

At ADTRAN, you are expected to use good judgment in incurring expenses and you should try to minimize cost while accomplishing your assigned objective. You should not expect to incur a financial gain or a financial loss when traveling for ADTRAN. If, however, you don't comply with the policies outlined below, you may be personally liable for the expenses, and could be subject to disciplinary action up to and including termination.

Prior approval from your Senior Vice President or Managing Director is required for any deviation from this policy.





Business Travel

TRAVEL AUTHORIZATION

TRAVEL APPROVAL

Prior to initiating any travel plans (including purchasing airline tickets, etc.), you should coordinate with your supervisor.

You should consider alternatives to business travel (e.g. telephone, online conferencing or video conferencing) prior to initiating any travel arrangements.

SPOUSE/COMPANION/FAMILY TRAVEL

Business travel with your spouse or family is strongly discouraged. Travel expenses for your spouse, family, or companion are not reimbursable. However, if warranted by certain circumstances, you should discuss with the department Vice President or Managing Director and your Supervisor and remain aware of possible tax implications of spousal expense reimbursements.

TAX IMPLICATIONS

You are personally responsible for any tax implications caused by claiming non-compliant expenses.

TRAVEL AGENCIES

The on-site agent at the Huntsville, Alabama office can be reached as follows:

8:00 A.M. to 5:00 P.M. (CST) 256-963-8079 travel@adtran.com

After-hours: 888-428-8581, VIT (very important traveler) Identifier is 71UA, which identifies the ADTRAN account to the CWT representative.

Employees should refer to the country specific Appendices included in this document for contact information for their designated travel agent.

Each traveler should maintain a current completed traveler profile on file with the designated travel agency in the traveler's respective country before any travel is commenced. It is the traveler's responsibility to ensure the profile information is kept up to date and is accurate.

AIRLINE TRAVEL

You should book all air travel through ADTRAN's designated travel agent available in your region. Use of designated travel agents will help ensure receipt of preferred airline discounts. You are encouraged to compare rates with your designated travel agent and then book the lowest cost option. Tickets are typically issued as non-refundable in the interest of lowering the total cost to ADTRAN. Electronic tickets will be the employee's original receipt for filing of expense reports.

You should schedule flights as far in advance of travel as practical, and use of discount advanced purchase fares is strongly encouraged. A minimum of 7 days in advance is encouraged. Air travel must be pre-approved when destinations are within a 250 mile/400 kilometer radius of the employee's work location or residence.

CLASS OF SERVICE

All flights are required to be booked in coach class or at a lower fare. Any exception to the coach class policy requires prior approval by the department Vice President or Managing Director. You may use upgrades earned through frequent flyer programs for an upgraded class of service, if there is no additional cost to ADTRAN. You should not book a higher fare class in order to use upgrade privileges when a lower fare exists on the same flight.

An upgrade in class of service may be warranted if any of the following exceptions applies:

- Single flight segment greater than 10 hours and a business meeting with a customer or prospective customer is scheduled immediately after arrival at an international location
- Business travel with a customer who is traveling in a different class of service

If any of these exceptions applies, you should discuss the circumstances with your department Vice President or Managing Director and obtain approval prior to completing your travel arrangements.

FLIGHT ITINERARY CHANGES

When your travel plans change, you should contact the carrier or ADTRAN's designated travel agent as soon as possible. If you need to change your travel plans, you must attach an explanation to your expense report to support any additional expense.

FLIGHTS OUTSIDE YOUR HOME COUNTRY

If your plans change while on an international flight, note that international carriers have different and sometimes complicated rules and regulations. If plans change while en-route, it is often less expensive to have the ticket reissued, instead of getting a new or separate ticket, which could result in additional cost. If you need assistance with reissuance of a ticket, contact your designated travel agent. See appendix.

REFUNDS FOR UNUSED TICKETS

If you have unused or partially used tickets, you must notify ADTRAN's designated travel agent so proper measures may be taken to recover the value of the ticket. Non-refundable tickets will be noted in the employee's profile and applied toward future travel.

LOST/DAMAGED BAGGAGE

If you have checked baggage that is lost or damaged by the carrier, you should report this to the airline prior to departing the airport. Any loss or damage of personal items incurred while traveling for business purposes may only be reimbursed with approval of the department Vice President or Managing Director.

PERSONAL AIRCRAFT

You are not permitted to fly yourself or anyone else on company business. There will be no reimbursement for any associated cost of the use of a private aircraft.

HOTELS

To support prearranged discounts with hotels in certain areas, you are encouraged to book all reservations through ADTRAN's designated travel agent or Cliqbook. Convention/seminar travel with special rates provided through the sponsor of the event should also be compared to ADTRAN's designated travel agent rates for the venue, to ensure a better rate is not available. To ensure availability of preferred hotels, you should schedule reservations as far in advance of travel as practical; at least 10-14 days is recommended. Overnight stay is discouraged when destinations are within a 75 mile/120 kilometer radius of your work location or residence.

CLASS OF HOTEL

ADTRAN's policy is to reserve moderate class of hotels for overnight business travel. Any exception to this policy requires prior approval from the Senior Vice President or Managing Director. Employees are encouraged to use ADTRAN's designated travel agency's services to reserve a room. Refer to specific country Appendices for list of preferred hotels. Lower priced hotels are encouraged where they are known to be of good quality. It is the employee's responsibility to confirm the stated room rate upon check-in. If you are attending a meeting or conference involving a room block, please notify ADTRAN's designated travel agent of the meeting name, or the employee may make the reservations directly with the hotel.

UPGRADES

Employees may accept complimentary room upgrades offered by the hotel upon check-in, as long as no additional cost is incurred by ADTRAN.

CANCELLATIONS

Employees need to be aware of the cancellation policy of the hotel they have requested and cancel within the required deadlines to avoid any penalties. Be sure to make a note of the cancellation number and the name of the person cancelling the reservation.



GROUND TRANSPORTATION

RENTAL CARS

You should avoid renting cars when public transportation or other more economical modes of transportation are available. You should rent cars for travel to destinations when driving is more cost-effective than airline travel. You should rent cars at destinations when the rental cost is less expensive than other modes of transportation such as taxis, shuttles, etc.

You are encouraged to book rental cars with ADTRAN's preferred suppliers through ADTRAN's designated travel agent. ADTRAN is self-insured within the United States, and therefore, you should decline the insurance offered by the rental car agency. Refer to country specific Appendices to determine if additional insurance should be purchased in countries outside the United States.

Economy or mid-size cars are to be rented at all destinations that require the use of a rental car. Full-size cars may be rented when three or more employees and/or customers are traveling together and should be selected based on space requirements.

A detailed rental receipt is required as proof of payment to qualify for reimbursement.

One way rentals or a return to a different location often result in higher fares due to drop-off fees. In most instances, returning the rental car with a full tank of gas will be more economical than returning the automobile empty, and you should adhere to this policy.

In the event of an accident, it is your responsibility to file a police report and promptly report all damages to the rental agency. You should also immediately report the accident to ADTRAN's Treasury/Risk Management department.

AIRPORT/HOTEL SHUTTLES

Whenever possible, you should use the complimentary shuttle service provided by most major hotels for transportation between the airport and hotel and/or ADTRAN office.

PUBLIC TRANSPORTATION

Public Transportation, including trains and ferries, may be used when feasible as alternative forms of transportation. A receipt must be submitted with the expense claim form stating the date, cost, and destination.

TAXI SERVICE

Taxis may be used for short distances where practical, or when other public transportation is not available. You must pay the taxi fares and submit them on an expense report for reimbursement.

CHAUFFEURED CAR SERVICE

Chauffeured car services are authorized only when it is the least expensive form of ground transportation, or when personal car mileage plus parking charges exceed the cost of this service. However, in certain countries where safety is a concern, a chauffeured car service is permitted. If you are traveling to a country where hired drivers are typically recommended, you should discuss with your supervisor prior to your trip.

MILEAGE REIMBURSEMENTS

You will be reimbursed for travel in a personal vehicle, while on ADTRAN business for incremental miles or kilometers driven (excluding normal commute distance between the permanent workplace and employee's home) in accordance with local country rules concerning tax exempt mileage allowances, if applicable.

The mileage purpose, detail, and the distance traveled must appear on the expense report. If mileage is the only reimbursed expense and is submitted on a monthly basis (as one reimbursement item), a detailed log including business purpose, destination, etc. must be provided. Generally, mileage reimbursement requests must be submitted on the same report with any other expenses incurred during the corresponding travel. Use of rental cars instead of personal vehicles is encouraged when doing so reduces the overall cost to the company.

Refer to country specific Appendices for mileage reimbursement rates by country.

INTERNATIONAL TRAVEL

PASSPORT AND VISA SERVICES

If your job function necessitates travel outside your home country, you are responsible for having a valid passport. It your responsibility to determine any VISA requirements and obtain any necessary VISAs prior to leaving for business travel in foreign countries. Any costs related to VISA and passport application will be reimbursed by ADTRAN and should be claimed together when submitting the Concur expense report. If you have questions, passport and VISA information can be obtained from your designated travel agency. It is recommended that you keep a photocopy of your passport with you, separate from the passport, in the event the original passport is lost or stolen.

VACCINATIONS

When you are arranging business travel, it is your responsibility to obtain all necessary vaccinations as required by the authorities of the country of visit. The cost of the vaccination may be claimed when you submit your expense report through Concur after the trip.

CURRENCY CONVERSION

Bank Fees associated with converting one currency to another are allowed for reimbursement. The rate for international hotels is shown on travel itineraries in the currency of your home country, which is converted from the currency of the hotel's country using an exchange rate in effect on the day the reservation was made. This exchange rate may differ from the exchange rate actually used when the bill is charged. When claiming reimbursement, you must use the exchange rate applied when you are ultimately charged. You should not have the currency converted at the hotel due to use of unfavorable exchange rates and additional charges that may be incurred. You should neither benefit nor be penalized from variations or fluctuations in monetary exchange rates.

INTERNATIONAL CAR RENTAL

All international drivers must be in possession of a valid driver's license from their country of residence, and have held this for at least one year. Some countries may require an international Drivers License to be able to rent cars. It is your responsibility to determine and hold the type driver's licenses needed for business travel.

GROUPTRAVEL

No more than 25% of a department can travel together without Senior Vice President or Managing Director approval, with the exception that two employees may travel together, regardless of department size. No more than two senior level executives should travel together.

TRAVEL SAFETY

Your safety is ADTRAN's utmost concern. You should avoid areas of regional conflict when traveling on Company business. In addition, the following website may be helpful when planning your trip: www.travel.state.gov. You should contact Human Resources if there are questions regarding travel safety. See Appendix E for Travel Safety Guidelines.



Other Expense Reimbursement Guidelines

MEALS AND ENTERTAINMENT

ADTRAN does not restrict travelers to a per diem rate. When traveling, we expect you to accomplish the business objectives, while minimizing Company expense by finding reasonably priced meals and entertainment. Meals will be reimbursed for the period of time you are traveling and conducting company-related business. Meals and entertainment between employees are permitted to the extent there is a valid business purpose associated with such expenses. The senior employee shall pay the charges incurred and file the expense report to be reimbursed.

ADTRAN expressly prohibits business entertainment in a questionable or inappropriate manner. Any and all expenses deemed inappropriate will not be considered for reimbursement.

OTHER REIMBURSABLE EXPENSES

TELEPHONE/FAX EXPENSE

When traveling, you should use the most cost effective method available for telecommunications. Use of air phones is permitted for emergency use only. Personal long distance calls while traveling on business are permitted, but you are expected to use good judgment in the frequency and duration of such calls. If you are approved for cell phone reimbursement, you are encouraged to participate in the corporate billing program. If you choose to submit cell phone expenses incurred for business purposes on a personal cell phone plan, you will be limited to set monthly amounts. Refer to country specific Appendices for allowable amounts. When submitting cell phone bills, please submit only the page(s) corresponding to the amount of the reimbursement being requested.

CONTINUING EDUCATION

Your continuing education expenses and travel cost associated with this education will be reimbursed by ADTRAN to the extent they are incurred at the lowest possible cost to ADTRAN. They must be approved in advance by your supervisor, or must be required to maintain certifications necessary for your job.

ELECTRONICS

Purchases of electronics (iPad, smart phones, computers, headphones, and earbuds) require a supervisor's preapproval to be attached with the receipt/report.

NON-REIMBURSABLE EXPENSES

The following list of expenses, which is not intended to be all-inclusive, is not reimbursable. If you have questions about whether or not an expense is reimbursable, you should consult your department supervisor or the accounts payable / travel department.

- Movie rentals or in-room movies
- Cost incurred for hotel room or service upgrades
- Baby or pet sitting services
- Dry cleaning/laundry services (exception if employee has been out of town on business travel for four consecutive nights or longer)
- · Health or fitness club fees
- Mini-bar refreshments
- · Spa, massage or beauty services
- · Luggage/briefcases required
- Replacement laptop bags greater than \$50
- Clothing
- Airline, hotel, or other club membership dues or fees
- Traffic fines or parking tickets
- Meal tips in excess of 20%
- Other gratuities exceeding \$10 not accompanied by a receipt
- Credit card membership fees
- Credit card finance charges
- Sightseeing or personal side trips
- Personal items such as toiletries, medicine, and sunscreen
- Payments made by gift cards
- · Loss/theft of personal funds or property
- Optional travel or baggage insurance
- Phone calls made from aircraft

Expense Payment and Reimbursement

CORPORATE CREDIT CARD PROGRAM

If you travel on company business frequently, and you prefer not to use your own credit card, ADTRAN will provide you a Corporate Credit Card. If you incur business related expenses routinely, you are encouraged to apply for a Corporate Credit Card. Charges on these cards will auto-populate the Concur expense report. Corporate credit cards should only be used for approved business expenditures. No personal items should be submitted for reimbursement, and if they are submitted, they will not be reimbursed.

All charges on the Corporate cards will be paid directly by the Company. Accounts payable personnel will match the travel card charges appearing on a central bill with the receipt details submitted through Concur. The department purchasing card charges appearing on the central bill will be matched up with paper copies of the receipts, which must be submitted with the departmental card statements. It is very important to submit all credit card documentation promptly to allow accounts payable sufficient time to match and review receipts and submit payment before the end of the statement grace period.

Corporate cards must be returned to accounts payable upon leaving employment with ADTRAN.

PAYMENT METHODS AND REIMBURSEMENT

You should pay for non-airfare travel and other reimbursable expenses on your company issued or personal credit card where practical. Cash payment is suggested only when Corporate Credit Card is not accepted or applicable (i.e. very low value amounts). Airline travel booked through ADTRAN's designated travel agent or with the Cliqbook reservation tool can either be direct billed to ADTRAN, charged to the Corporate travel card, or charged on the employee's personal card. In certain instances, hotel reservations may be direct billed to ADTRAN. Airline travel and hotel reservations that are direct billed to ADTRAN are required to be listed on the employee's expense report as "company paid," and a copy of the receipts for these items should be included with the expense report submission.

All guidelines included in this policy apply regardless of payment method.

RECEIPTS AND SUPPORT

While the submission of receipts for all expenditures is encouraged for reimbursement, an original receipt is required for expenditures of more than \$20 USD, €20 EUR, or equivalent in your local currency. In the case of a lost original receipt, a copy of a credit card statement clearly identifying the charge may be substituted and should be accompanied by a brief note explaining the absence of a receipt. Expenditures for business related meals and entertainment require the employee to document on the expense report the place, persons entertained, business relationship, and business purpose. Company-reimbursed entertainment should always be in conjunction with a valid business purpose. Receipts submitted for reimbursement must be intact (all headings, etc. clearly visible) and contain the details supporting the expenditure claimed ("balance forwards" will not be reimbursed).

If you travel or are located outside the United States you may sometimes receive receipts in a foreign language. If so, and if the nature of the expense is not readily apparent, you must provide an English explanation on the receipt or in the comments section in Concur.

REIMBURSEMENT

You are responsible for submitting your expense reports promptly and accurately for all business expenses (Company paid and employee paid) through ADTRAN's electronic expense report system, Concur. If you have questions about accessing or using the Concur system, you should email **expensereports@adtran.com**.

When submitting an expense report, you should enter all expenses into Concur and attach the required receipts either through the fax or scan method. Prior to submitting the report, you should carefully view all receipts attached to each Concur electronic filing to determine that they are clearly readable to avoid delays in processing for reimbursement. You should then submit your report for your supervisor's approval by using the instructions. It is your responsibility to file your own expenses using Concur. You should never seek reimbursement through another employee. You should retain your original receipts scanned or faxed into the Concur system for one year from the date the report is submitted for reimbursement, or longer if required by tax laws in your location.

Your expense reports should be submitted in a timely manner. Each travel expense claim should be completed within seven days once the trip has been completed. Charges not submitted for reimbursement within 45 days of date incurred will not be reimbursed by ADTRAN.





APPENDIX A: NORTH AMERICA

Designated Travel Agent	Carlson Wagonlit (CWT)
Preferred Airline	Delta for domestic travel
Preferred Hotel	Marriott Courtyard, Hilton Garden Inn, or other comparable provider
Preferred Car Rental Agency	Hertz
Optional Insurance Coverage	not reimbursable for travel inside the U.S. or Canada, as ADTRAN is self-insured
Corporate Credit Card Provider	Bank of America
Mileage Reimbursement Rates:	Current mileage reimbursement rates are maintained in Concur and automatically populate the expense report when miles driven are entered.
Employees who do not receive car allowance	\$0.55
Employees who receive car allowance	\$0.27
Reimbursable Cell Phone Charges, if not on Corporate plan:	
Voice/data plans	\$70 per month
Voice only plans	\$50 per month

APPENDIX B: EUROPE

Designated Travel Agent	Carlson Wagonlit (CWT)
Preferred Airline	No preferred provider currently
Preferred Hotel	No preferred provider currently
Preferred Car Rental Agency	No preferred provider currently
Optional Insurance Coverage	Required
Corporate Credit Card Provider	Bank of America
Mileage Reimbursement Rates:	Current mileage reimbursement rates are maintained in Concur and automatically populate the expense report when miles driven are entered.
Employees who do not receive car allowance	Current rates in Concur
Employees who receive car allowance	Current rates in Concur



APPENDIX C: ASIA PAC

Designated Travel Agent	In Australia for International Travel: Corporate Traveller Vic107 Phone Contact: (03) 9026 3758 Email: elizabeth.newton@corporatetraveller.com.au In Australia for Domestic Travel: Executive Edge Travel & Events Phone Contact: (03) 9519 7777 Email: corporate@executiveedge.com.au
Preferred Airline	No preferred provider currently
Preferred Hotel	No preferred provider currently
Preferred Car Rental Agency	No preferred provider currently
Optional Insurance Coverage	Required
Corporate Credit Card Provider	Bank of America
Mileage Reimbursement Rates:	Current mileage reimbursement rates are maintained in Concur and automatically populate the expense report when miles driven are entered.

APPENDIX D: LATAM

Designated Travel Agent	
Preferred Airline	No preferred provider currently
Preferred Hotel	No preferred provider currently
Preferred Car Rental Agency	No preferred provider currently
Optional Insurance Coverage	Required
Corporate Credit Card Provider	None currently
Mileage Reimbursement Rates:	Current mileage reimbursement rates are maintained in Concur and automatically populate the expense report when miles driven are entered.

APPENDIX E:TRAVEL SAFETY GUIDELINES

We encourage you to consider the following general principles in the preparation for business travel:

- The travel route should be selected so as to avoid areas of crisis and any known strikes that could adversely affect the implementation of the trip.
- The supervisor/travel arranger and the employee's family are to be informed of any significant changes in the travel program.
- Valuables should be kept in the hotel safe.

- All luggage should be kept secured and under constant observation.
- The location of the emergency exits should be noted and checked.
- Services are to be accepted with caution (taxis, porters, etc.).

ADIRAN

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General Information

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