

Standard

Supplier Travel & Expense Standards

Effective Date: January 1, 2025

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1. Summary or Rationale

The JPMorgan Chase & Co. (JPMC or the firm) Supplier Travel and Expense Standards (“Standards”) applies to a supplier of products or services (“Supplier”) to JPMorgan Chase Bank, National Association (“JPMC”), or a JPMC affiliate(s). For purposes of this Standard, “Supplier Personnel” will include Supplier’s employees, temporary employees, independent contractors, subcontractors, agents or any other person or entity acting on its behalf. The Standards set forth the requirements for Supplier Personnel for travel and expense reimbursements.

2. Scope

	Subject to	Role to Play
Lines of Business	<i>All LOB Suppliers</i>	<i>All</i>
Corporate Functions	<i>All</i>	<i>OCFO > CAO > Global Supplier Services</i>
Locations	<i>All</i>	
Legal Entities	<i>All</i>	

2.1. Scope Description/Exceptions

- Registered Supplier Personnel may be subject to more stringent requirements.

3. Changes from Previous Version

- Update the previous [Supplier Travel & Expense Policy](#) with new Standards.

4. Standard Statements

JPMC expects Suppliers will be prudent in travel and expense spend and adhere to these Standards, as they would their own company policies.

- JPMC and Supplier agree that all budgets, approvals, and other relevant information relating to any travel and expenses incurred to provide products or services on behalf of JPMC must be mutually discussed, pre-approved and documented in a written instrument and signed by both parties in advance. Unless specifically authorized in writing by JPMC, no travel and expense costs will be reimbursed by JPMC.
- JPMC will only reimburse Supplier for actual, ordinary, necessary, and reasonable travel and expense costs. The reasonableness of any expense shall be determined by JPMC in its sole and complete discretion. JPMC and Supplier must specify in the applicable Schedule or Task Order the maximum amount that JPMC will reimburse.
- Unless otherwise authorized by the JPMC Relationship Manager or JPMC Project Manager with appropriate authority, a Supplier shall not submit for reimbursement any amount which exceeds the limits previously authorized by JPMC. For purposes

of this Standard, the terms JPMC Relationship Manager and JPMC Project Manager will jointly and severally be referred to as the “JPMC Manager”.

- d) To provide cost-effective services to JPMC, Supplier shall use best efforts to supply qualified local personnel for performance of services for JPMC to the extent reasonably possible. JPMC shall have no responsibility to reimburse any travel expenses performed by local personnel supplied by Supplier. For the purposes of this Standard, the term “local” shall mean residence or Supplier designated office of the applicable personnel within a fifty (50) mile radius of the location where the applicable services are performed.
- e) JPMC would like to have very communicative relationships with its Suppliers and is always open to discussing lower cost options. If certain travel circumstances may be more beneficial to Supplier and JPMC yet would be exceptions to the Standard, JPMC may but is not obligated to consider such exceptions.

5. Air Travel

Supplier Personnel must fly in economy or coach class and select the Lowest Logical Airfare (“LLA”) which allows the Supplier Personnel to meet JPMC business objectives. LLA is the lowest priced, non-stop flight on any major carrier within a two-hour window of the requested departure or arrival time. If there is no non-stop available flight, the LLA is the lowest priced connecting flight that does not increase the total travel time by more than one-hour over the requested connecting flight.

Supplier must provide an explanation to the JPMC Manager upon submission of reimbursement if the actual fare used exceeds the LLA. If the fare difference is \$250 or more, Supplier must get an additional written approval from the JPMC Manager prior to ticketing, or the difference in price will not be reimbursed.

JPMC will not reimburse Supplier for first or business class travel expenses, except as follows:

- **Domestic** (within U.S. or Canada): One class upgrade on overnight flights with work the next day
- **International** (travel within Latin America, Asia Pacific, Middle East and Africa): Business class
- **International – Intercontinental** (e.g. Singapore – U.K.): Business class

Air travel is prohibited between New York and the following: Trenton, NJ; Wilmington, DE; and Philadelphia, PA. JPMC will not reimburse any additional costs related to the accrual or administration of frequent flyer or other benefits.

If Supplier Personnel receive a full or partial refund from an airline for a business trip paid by JPMC, the refund must be paid to JPMC. This refund requirement pertains to cash refunds, corporate credit card refunds and airline vouchers, where applicable.

Reservations should be made as far in advance as possible (i.e., at least two weeks prior to travel). Non-refundable tickets should be utilized whenever possible. Non-refundable tickets or applicable change fees will not be reimbursed if a trip is changed or canceled, and the ticket cannot be re-used for JPMC-related business. Lost ticket application fees, extra leg room fees and charges for travel and luggage insurance are not reimbursable expenses. JPMC will reimburse reasonable baggage fees for one bag only.

To receive the firm's business-related travel rates, Supplier Personnel who are assigned a JPMC Standard ID, should utilize the firm's travel intranet pages to connect to the firm's global travel agency. Supplier Personnel who are not assigned a JPMC Standard ID should engage the JPMC Manager to obtain an appropriate travel agency phone number.

6. Hotel/Lodging

Reimbursement for overnight lodging will be provided only if the overnight lodging is a JPMC business-related requirement and specifically pre-approved by the JPMC Manager. Supplier Personnel are to use standard single hotel accommodations at the prevailing commercial rates within a reasonable distance from the destination location. The use of high-priced rooms, suites, executive floors, or concierge levels is not reimbursable.

Hotels over \$300/night require the pre-approval by the JPMC Manager. Non-refundable lodging commitments or applicable change fees will not be reimbursed if a trip is changed or canceled. No-show charges incurred by failing to cancel unused hotel reservations will not be reimbursed.

7. Ground Transportation

JPMC prohibits the use of "lavish and extravagant" transportation. Supplier Personnel should utilize the most cost-effective mode of transportation for their destination, keeping in mind safety for the location. Ground transportation will be reimbursed for shuttle, bus, and taxi or car rental subject to this Standard. If a rental car is necessary and approved by the JPMC Manager, an intermediate/mid- size car is the standard. It is Supplier and Supplier Personnel's responsibility to obtain and maintain appropriate levels of auto insurance. JPMC will not reimburse for any auto insurance costs.

Parking, taxi, gas, and toll expenses will be reimbursed to the extent that they are necessary and reasonable. Rental cars should be re-fueled prior to return. Fines for parking, traffic violations or towing charges will not be reimbursed. If JPMC reimburses for a rental car and fuel costs, JPMC will not reimburse for driven mileage. Car service with a driver/chauffeur is prohibited (except in the UK after 10pm, New York after 9pm and Brooklyn after 8pm with JPMC Manager approval).

8. Meals

JPMC will reimburse up to \$65 per day for meals, including tax and tip (Breakfast - \$10, Lunch - \$15 and Dinner \$40).

JPMC does not reimburse for lunch unless you typically bring your lunch each day to work, or there is no JPMC cafeteria available. In the U.S., tipping up to 15% is warranted for good service and only exceptional service warrants a 20% tip. For non-U.S. locations, tipping should be calculated in accordance with reasonable and customary practices in the applicable location. If a hotel is utilized that offers free breakfast, additional breakfast expenses will not be reimbursed.

9. Rail Travel

Class of Service, Domestic or International is as follows:

- Economy/coach: trip that is 3 hours or less
- Business class: trip that is more than 3 hours

Exception: Business First when traveling on Eurostar between London/Paris and London/Brussels

Where customary, tickets for domestic rail travel should be purchased at the point of departure. When traveling on Amtrak in the U.S. and Canada, Supplier Personnel must book reservations at least three days in advance (when possible) directly with Amtrak via the Amtrak web site and obtain tickets at a train station kiosk. For non- Amtrak rail travel, Supplier Personnel should take reasonable steps to book reservations in advance via the lowest cost method (e.g., online).

10. Parking

Parking expenses incurred during business travel are reimbursable.

11. Phone Expenses

Phone expenses are not reimbursable by JPMC and should be at Supplier's or Supplier's Personnel's cost. If JPMC requires Supplier Personnel to travel internationally, JPMC will reimburse reasonable phone expenses (i.e. JPMC business-related and daily check-in with family) with prior written approval from the JPMC Manager. The lowest cost options should be utilized.

12. Non-Reimbursable Expenses

All other expenses should be authorized by the JPMC Manager prior to incurring such expenses; otherwise, such expenses will not be reimbursed. Non-reimbursable items include but are not limited to the following:

- Accommodations/Hotel over \$650/night
- Airfare to extend business trips for personal reasons
- Airport Security Program
- Alcohol or other expenses of a personal nature
- Auto Insurance Costs
- Barber/hairstyle fees
- Car service with a driver/chauffeur is prohibited (except in the UK after 10pm, New York after 9pm and Brooklyn after 8pm with JPMC Manager approval).
- Car washes, repairs, towing, and other types of maintenance
- Charitable Contribution
- Child Care Reimbursement
- Clothing, toiletries, or medications
- Commuting expenses
- Currency conversion fees for international travel

- Deal and Non-Deal Roadshow Expenses
- Employee - Condolences / Sympathies
- Employee Appreciation/ Gifts & Rewards
- Employment Tax Reimbursements
- Equipment to Work from Home
- Finance charges/ late payment fees of any kind
- Fuel charges for personal vehicles
- Health clubs & beauty spas
- Immigration Visa Issuance
- Insurance / Lost Personal Items
- Laundry and dry-cleaning services if traveling less than 6 consecutive nights
- Meals - Overtime
- Medical / Optical Expenses (Non-Travel)
- Medicine/Vaccination of any type (except for required international travel)
- Memberships and Related Expenses
- Mini-bar/refreshment center charges
- Office Decorations
- Package and Document Delivery
- Passport / Visa
- Per Diems or daily allowances
- Personal entertainment (newspapers, magazines, movies, etc.)
- Personal housekeeping expenses while traveling for JPMC business
- Personal Property Damaged or Stolen (including luggage)
- Phone expenses. (If JPMC requires Supplier Personnel to travel internationally, JPMC will reimburse reasonable phone expenses i.e. JPMC business-related and daily check-in with family. The lowest cost options should be utilized.)
- Promotional Items
- Relocation Expenses
- Shoe repair
- Sponsorships
- Spouse / Companion Spend
- Traffic violations, parking tickets, towing charges and related court costs
- Travel time
- Tuition & Training
- Unexplained, excessive unreasonable or lavish expenses
- Uniforms

13. Reimbursement Process

Supplier Personnel are to use their own personal or company credit card for travel expenses; Supplier Personnel are not eligible for a firm-issued corporate card.

Supplier must submit an invoice to the JPMC Manager for reimbursement in accordance with the applicable Supplier agreement or purchase order terms and condition and via the Submissions to the JPMC Manager for reimbursement must **reference a valid purchase order or valid schedule referencing a valid Master Agreement**. Reimbursement requests and invoices which do not reference a purchase order or a Schedule (including CRW#) will be rejected or returned to the Supplier. All expense claims shall be submitted within 10 days after the beginning of each month and no later than one (1) month after the date the actual

expense was incurred.

For international travel, currency exchange rates shall be indicated in all invoices or statements. Fees for currency conversion shall not be reimbursed. All expense limits in this Standard are in U.S. dollars. For international travel, the expense limit should be adjusted by the applicable exchange rate. Where appropriate, such as lower cost countries, any expenses submitted to JPMC for reimbursement should not exceed commercially reasonable rates for the international location.

14. Defined Terms

Ariba	Preferred system when engaging suppliers for the purchase of goods and/or services where Purchase Orders (POs) are issued prior to vendor engagement and invoicing.
OCFO	Office of Chief Financial Officers
CAO	Chief Administrative Office
Purchase Order (PO)	A form of Ordering Document which implements pre-set Terms and Conditions set forth in a Master Agreement or assigns standard Terms and Conditions where a Master Agreement is not in place.
Supplier/ Supplier Personnel	Any third party, firm or individual that provides a product or service to the firm, including suppliers, vendors, consultants, agents, contractors, temporary workers, third parties working on behalf of the firm as well as the owners, officers, directors, employees, consultants, affiliates, contractors and subcontractors of these organizations and entities.

15. Legal and Other References

Statutes, Laws, Rules, Regulations or External Guidance	<p>The requirements under this document are to be applied consistent with the statutes, laws, rules, regulations, or external guidance of the jurisdictions in which the firm operates. The below may not represent an exhaustive list and should be cross-referenced with the Obligations in ELA.</p> <p>Various Expense Tax Requirements:</p> <p>US: http://www.irs.gov/</p> <p>UK: https://www.gov.uk/government/organisations/hm-revenue-customs</p> <p>Canada: https://www.canada.ca/en.html</p> <p>Argentina: https://www.economia.gob.ar/en/</p> <p>Brazil: https://www.gov.br/</p> <p>Chile: https://www.gob.cl/</p> <p>Colombia: https://www.gov.co/</p> <p>Mexico: https://www.gob.mx/</p> <p>Bahamas: https://www.bahamas.gov.bs/</p> <p>Netherlands (Amsterdam): https://www.amsterdam.nl/</p> <p>Belgium (Brussels): https://www.belgium.be/</p> <p>France (Paris): https://www.gouvernement.fr/</p> <p>Germany: https://www.bundesregierung.de/breg</p> <p>Ireland (Dublin): https://www.gov.ie/</p> <p>Channel Islands (Guernsey, Jersey): https://www.gov.gg/; https://www.gov.je/</p> <p>Luxembourg: https://gouvernement.lu/en.html</p>
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	<p>Nordics (Sweden/Finland/Denmark/Norway):</p> <p>https://www.government.se/government-of-sweden/</p> <p>https://valtioneuvosto.fi/</p> <p>https://denmark.dk/</p> <p>https://www.regjeringen.no/</p> <p>Russia (Moscow): http://government.ru/ (not secured)</p> <p>South Africa: https://www.gov.za/</p> <p>Spain (Madrid): https://www.lamoncloa.gob.es/</p> <p>Italy (Milan): https://www.governo.it/</p> <p>Switzerland (Geneva and Zurich): https://www.admin.ch/gov/</p> <p>Poland: https://www.gov.pl/</p> <p>Middle East (Bahrain, Riyadh, Dubai, Qatar):</p> <p>https://www.bahrain.bh</p> <p>https://www.alriyadh.gov.sa/</p> <p>https://u.ae/en/#/</p> <p>https://www.gco.gov.qa/</p> <p>Turkey: https://www.turkiye.gov.tr/</p> <p>Australia: https://www.ato.gov.au/</p> <p>Hong-Kong: https://www.ird.gov.hk/</p> <p>India: https://incometaxindia.gov.in/</p> <p>Japan: https://www.nta.go.jp/</p> <p>New Zealand: https://www.ird.govt.nz/</p> <p>Philippines: https://www.bir.gov.ph/</p> <p>Singapore: https://www.iras.gov.sg/</p> <p>Malaysia: https://www.malaysia.gov.my/</p> <p>China: https://www.gov.cn/</p> <p>Vietnam: https://vietnam.gov.vn/</p> <p>Thailand: https://www.thaigov.go.th/</p> <p>Korea: https://www.gov.kr/portal/foreigner/; https://www.mofa.go.kr/</p> <p>Indonesia: https://kemlu.go.id</p> <p>Taiwan: https://taiwan.gov.tw/</p> <p>Pakistan: https://pakistan.gov.pk/</p>
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16. Firm References

Other Firm Policies or Standards	<p>Suppliers</p> <p>Supplier Code of Conduct</p> <p>Supplier Minimum Control Requirements</p> <p>Supplier Minimum Control Requirements Contingent Labor</p>
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