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A. General Matters

It is important to note the most effective means of reducing travel costs is to not travel at all. This may include utilizing video conferencing, conference calling, or e-mailing alternatives. When travel is required however, travellers must adhere to the Schneider Electric Global Travel Policy and their local attributes.

A1. PURPOSE & SCOPE

PURPOSE OF THE POLICY

Objective of the Schneider Electric Business Travel Policy is to provide travel solutions that:
- optimize the overall travel process
- ensure traveller safety and security
- reduce the Schneider Electric Carbon Footprint
- allow better business travel productivity
- provide better control of travel expenses
- clarify rules for reaching a full compliance of employees with the Business Travel Policy

BALANCE OF TRAVELS AND ALTERNATIVE SOLUTIONS

In a global organisation, such as Schneider Electric, there is an operational necessity for people to regularly meet personally face to face. However spending excessive amounts of time away from the office can be counter productive to some extent for certain jobs.

Before travelling, each employee must strongly consider alternative methods such as video, web and telephone conferences.
When travel is confirmed, local Entity rules are to be applied while minimizing the number of people travelling.

- Managers are responsible for reviewing and approving the travel plans of their direct reports. Travellers should consider alternative methods of participation (video conferencing, etc) before confirming travel and should make every effort to limit the number of travellers who must attend each event.

- Any travel involving more than 1 Schneider Electric employee from the same department must obtain a specific multi-travellers pre-approval from Management.

POLICY SCOPE, ALIGNMENT and FAIRNESS

This document describes the global compulsory Schneider Electric guidelines, in coherence with the Company's values

- Each Entity will detail and update its own Policy in full compliance with these guidelines and local regulations
- Local Entity will look for convergence of rules inside a same geographical area

The rules and guidelines put forth in this travel policy document apply to all travellers in all entities (Including all subsidiaries)

- Each employee must follow strictly the travel policy of the entity he/she belongs to
- All rules will be fully transparent and fair regarding employees

Schneider Electric
Global Travel Policy
Effective: September 30, 2014
COMPLIANCE AND RESPONSIBILITY OF TRAVELLERS AND MANAGERS

This policy covers all SE employees worldwide. Each employee is responsible for his/her travelling purpose and decisions and has to obtain pre-authorization to travel from his/her manager when needed (see Entity detailed rules)

- This pre-authorization process applies also to risk management concerning specific countries (Central information provided by Security Department).
- The Security Department classifies risk countries depending on their level of risk. All travels to “red-risk” classified country must be formally approved by the country manager (of the destination country) and by the Group Security Department before departure.
- In order to be well prepared, Schneider Electric intranet tools on security matters gives some specific advices that must be read prior to any travel.
- The traveller is fully responsible for all confidential business data and documents he/she may take with him/her. This confidential data/documents must be kept safe and secure at all times throughout the journey.

The employee’s manager is responsible for reviewing the employee’s expenses reports and ensures compliance with his Entity Travel Policy.

- The traveller and the manager share the responsibility to ensure that each journey is undertaken in the most cost effective manner, taking into consideration the business need for the journey, the cost of available travel options and the comfort, safety, security and convenience for the traveller.

Travelling outside of the rules & guidelines set forth in this travel policy will encounter post-trip consequences including sanctions determined by each Entity.

A2. OWNERSHIP & ENDORSEMENT

OWNERSHIP

This travel policy was created and is owned by Schneider Electric Global Human Resources

ENDORSEMENT

Executive Vice President Global Human Resources and Executive Committee have approved the document.

UPDATE OF THE POLICY

This travel policy will be reviewed and/or updated periodically (once a year) by the SE Global Human Resources with the managerial entities.
A3. SECURITY AND SAFETY OF TRAVELLERS

The Safety and Security of each Schneider Electric Employee is the first and permanent concern to the company.

General rules:

- Each traveller can readily obtain access to in-depth and updated Safety & Security information in order to prepare travelling in best conditions.
- The location of each international traveller is easily traceable at any time. This enables assistance to be effectively provided should any security or safety issue occur. “Traveller tracking” is limited to train / flight and hotel registrations for business activity.
- Each traveller is under a specific insurance policy, provided by the Group or Entity. This insurance policy covers medical emergency and repatriation.
- The Group Security and Safety Department will provide all relevant information concerning temporary geographical risks. Travel limitations are to be defined accordingly

In order to support these rules, some dedicated Web & Intranet tools have been set-up by the company and by approved travel agencies. The use of these tools, when preparing travel abroad, is mandatory for all travellers and managers.

Each Schneider Electric Entity/ destination country is accountable for giving, to travellers and managers, all appropriate information about specific local regulation or security rules to observe.

- To be defined by local entity
B. Reservation Process

This Reservation process applies to all arrangements concerning the Business Travel (Air, Rail, Hotels, car rental……) and policy has to be applied in any case.
If for some reason it is not possible to follow the reservation process, then pre-approval of management or a post-travel detailed explanation are required.

B1. USE OF APPROVED TRAVEL AGENCY

It is mandatory that travellers make all travel reservations through the approved Travel Agency

- This can be done through the Intranet Online booking tool of the Agency
- Booking through Internet or unauthorised agents or directly with a supplier runs the risk of non-optimized cost for the Company from a purchasing point of view and safety issues for the travellers (Traveller tracking and security requirements on Air, Hotels……)
- If available, the usage of after hours/emergency service centre is allowed in emergency situations only. Detailed after hours/emergency services are provided locally.

B2. USE OF ONLINE BOOKING TOOL

Travellers are expected to use the most efficient and cost-effective booking method for making travel reservations. When available, the use of the approved Online Booking Tool connected to the Travel agency is mandatory for simple travel (point to point travel).

B3. TRAVEL AUTHORIZATION PROCESS

Travel authorization/approval is required for all travellers according to Entity rules

In any case, travel authorization/approval is to be obtained from the direct line manager
- Delegation from the Direct Manager to any other personnel should be exceptional
- The manager is expected to control all Business Travel choices and expenses made by his/her direct reports
- Additional authorisation levels can be applied according to local Entity rules
B4. TRAVELLER PROFILE

TRAVELLER PROFILE REQUIREMENT

It is mandatory that all travellers have a traveller profile in order to effectuate reservations. It is the traveller’s responsibility to ensure that the information in their travel profile held by the Travel Agency is updated. For reporting matters, the travellers’ profile must specify the employee code, the entity code and the cost centre.

DATA SECURITY & CONFIDENTIALITY

The traveller profile contains personal data collected only for the purpose of making travel reservations. Schneider Electric takes the commitment to keep personal information on employees confidential.

This confidentiality commitment implies that for each local implementation of the Global Travel Policy, the local legislation regarding the personal data protection is fully respected.

In that respect, the Schneider Electric Global Personal Data Protection Committee ensures, via its worldwide correspondents network that all personal data in Schneider Electric are constantly under protection. For any questions regarding personal data protection, the Committee can be contacted at the following email address: global-personal-data-committee@schneider-electric.com
C. Air Booking

C1. BOOKING CLASS

The approved Travel Agency will offer the lowest airfare in the appropriate class consistent with travel needs and requested itinerary.

One segment trip time duration

<table>
<thead>
<tr>
<th>0 hrs</th>
<th>6 hrs</th>
</tr>
</thead>
</table>

- **Economy**
- **Economy Premium**

Temporary modification: by decision of the Excom, and until the end of March 2015, the only booking Class is **Economy** for all.

ECONOMY CLASS BOOKING RULE

Our policy is to travel Economy class for single flights 6 hours and under.

Temporary modification: by decision of the Excom, and until the end of March 2015, the only booking Class is **Economy** whatever the status of the Traveller.

ECONOMY PLUS/PREMIUM CLASS BOOKING RULE

Economy Plus/Premium class air travel is allowed for:

Temporary modification: by decision of the Excom, and until the end of March 2015, the only booking Class is **Economy** for all.

BUSINESS CLASS BOOKING RULE

Business class travel is by an Excom member has been granted a Benefit. Temporary modification: by decision of the Excom, and until the end of March 2015, the only booking Class is **Economy** for all. Person has been nominated by Global HR & Purchasing, or (dispensation).

Schneider Electric
Global Travel Policy
Effective: September 30, 2014
A special dispensation must be notified, by email and by the Excom member, to the concerned Travel Agency and for each travel to be booked.

A business Class travel can be booked for medical reasons. In that case, the traveller must provide a medical dispensation (established by a physician) to the concerned HR department manager. This medical dispensation must mention that a travel in Economy or Economy Plus/Premium class is not possible and must mention the period concerned by the dispensation.

The HR manager will inform the concerned Travel Agency (email) that the employee is authorized to book Business for medical reasons.

**FIRST CLASS BOOKING RULE**

First class air travel is strictly forbidden.

**Temporary modification of the flight booking scheme:**

- **How to handle tickets already booked?**
  - If the trip is not considered as “Business Essential”, the ticket must be cancelled, even if it is a “non refundable” one.
  - If the ticket is booked in Premium Eco or Business Class, and the trip is considered as “Business Essential”, the ticket must be exchanged to an Economy one.

- **Dispensations (medical reason or specific reason formally validated by an Excom member)**
  - The ticket must be booked offline.

**C2. VENDOR & FARE SELECTION**

**ADVANCED PURCHASE REQUIREMENT**

Advanced purchase of air travel reservations is mandatory at least 14 days prior to travel for domestic and continental flights, 21 days for intercontinental flights. Exception can be allowed for unexpected meetings or validated special cases approved by your manager. The impact of such a rule is very significant at Group level.

**RESTRICTED FARE REQUIREMENTS**

The use of non-refundable flight tickets is recommended according to local Entity regulations and rules. Airlines allow changes to reservations up to the date of departure for a stated change fee.

**LOW COST SUPPLIERS**

In many markets, “Low Cost Carriers” offer similar itineraries and service at reduced rates. Usage of these Low Cost Carriers is strongly recommended. Only companies that are considered safe by the approved travel agency will be proposed to travellers.
CONFLICT BETWEEN SELECTED SCHNEIDER ELECTRIC SUPPLIERS AND LOWEST FARES

The traveller will respect strictly the airfares policies of Schneider Electric.

In the case of a conflict between an airfare offered by a Schneider Electric selected supplier, and a lower fare offered by another supplier, travellers must select the lowest fare obtained by the selected supplier. This rule is in alignment with the Global Purchasing Contract and optimizes costs at a Group level.

* The list of selected suppliers will be set up and communicated officially by the Purchasing Department. This list will be regularly updated to ensure the best conditions to travellers

PRIVATE PLANES

The use of private charter aircraft should always remain an exception and must require the authorization of an Executive Committee member.

In some situations and countries, the use of chartered planes may be necessary and unavoidable for operational reasons. All such charters will require an authorization by the Country Manager (of the destination country)

C3. TRAVELLER FLEXIBILITY OPTIONS

NON-DIRECT ROUTING

In some cases lower fares may be available by accepting a connection, or non-direct routing. It is recommended that the traveller accepts this option.

DECLINE LOW FARE FOR UPGRADE

It is critical to reserve the lowest available airfare for all flights provided control of the total cost of the travel and general comfort and safety rules defined upstream. Travellers may not decline this lowest fare.

Travellers must not decline the lowest fare in order to book a higher fare which allows for a frequent flyer upgrade to be used.

VOLUNTARY ITINERARY CHANGES

The voluntary changing of tickets provided by the concerned into cash or lower class tickets plus cash for personal gain is not permitted.

OPEN RETURN TICKETS

An 'open return' ticket will often result in an increased airfare. ‘Open return’ tickets are not allowed.
C4. OTHER RULES

FREQUENT FLYER MILEAGE POINTS PROGRAMS

Travellers are allowed to participate in frequent flyer mileage point programs.
- Frequent flyer mileage earned while travelling on company business may be used for personal travel.
- All flights must be booked based on cost-effectiveness, not the employee’s personal preference or ability to gain frequent flyer credit.
- All additional fees related to non-free memberships, access to non-free lounge clubs, seat change or other services will not be reimbursed.
- If the traveller wishes it, he can offer his / her flyer mileage to Airlines awarded foundations.

ELECTRONIC TICKETS

Use of electronic tickets (e-tickets) is mandatory wherever they are available.

EMPLOYEES TRAVELLING TOGETHER

In order to ensure business continuity, a manager cannot travel on the same flight with more than 2 of his direct reports.
Responsible management should ensure that a majority of their travellers do not travel together on the same flight.
**D. Rail Booking**

**D1. RAIL TRAVEL CLASS BOOKING RULE**

Rules will be adapted by each Entity, taking into consideration travel time for business work and the local context and existing local regulations.

French Example: (to update in all countries)

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**Booking Rules:**

- Advance booking: reserve between 3 weeks and 3 months before departure
- Trip < 3h30 → train is mandatory unless more expensive
- If the employee buys more than 6 trip per year, he/she has to buy a subscription

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**D2. OTHER RULES**

**FREQUENT TRAVELLER MILEAGE POINT PROGRAMS**

Travellers are allowed to participate in frequent traveller mileage point programs so long as no cost is incurred, and so long as this doesn’t create higher prices for Schneider Electric.

- Frequent traveller mileage earned while travelling on company business may be used for personal travel.

**RAIL VERSUS AIR**

Often, it is less expensive and more environmentally friendly to select rail travel over air travel. Travellers will examine the possibility to choose Rail when relevant.

**ELECTRONIC TICKETS**

Use of electronic tickets (e-tickets) is mandatory wherever they are available.
E. Hotel Reservations

E1. HOTEL CLASS BOOKING RULE

The travel Agency or the online booking tool will assist travellers in finding appropriate accommodation. It is mandatory that travellers book an hotel compliant with the travel policy and respecting the city caps in using the travel agency or, when existing, the online booking tool.

- A compliant hotel list will include identified international and domestic hotels.
- Exceptions can be allowed if no compliant hotels are available. In this case, travellers may book a hotel with a maximum price per night that is validated at Country level.

FRENCH EXAMPLE:

Spécificités territoire France

Vous devez réserver votre hôtel parmi les hôtels négociés par Schneider Electric, ces hôtels devant être réservés par MyWay ou la BCE.

Si pas de disponibilité sur les hôtels négociés : vous pouvez réserver dans un hôtel non négocié dans la limite des plafonds ci-dessous :

<table>
<thead>
<tr>
<th>Région</th>
<th>Plafond proposé pour maîtriser la dépense réalisée Hotel programme</th>
</tr>
</thead>
<tbody>
<tr>
<td>Région Parisienne</td>
<td>124 €</td>
</tr>
<tr>
<td>Rhône Alpes</td>
<td>94 €</td>
</tr>
<tr>
<td>Angoulême</td>
<td>80 €</td>
</tr>
<tr>
<td>Sud-Est (Nice, Valbonne, Carros, Antibes, Juan les Pins, Aix en Provence)</td>
<td>99 €</td>
</tr>
<tr>
<td>Reste de la France</td>
<td>78 €</td>
</tr>
</tbody>
</table>

INTERNATIONAL Hotels:

City caps of the visited country or region are to be respected.

HTML link to city caps

E2. OTHER RULES

BOOKING THROUGH THE AGENCY

Making hotel reservations through the approved Travel Agency or Self Booking Tool enables Schneider Electric to successfully leverage total hotel volume for future negotiations and most importantly, it enables the company to better locate its employees in the event of an emergency situation.
Booking through the travel agency or Online Booking tool is mandatory for all trips.

All reasonable efforts to avoid excessive charges for hotel rooms must be made. To avoid potential penalties, fees or incorrect charges, both the rate and departure date should be verified during check-in. The Company will not reimburse for room cancellation fees / no show fees unless there is a valid business reason.

**FREQUENT GUEST POINT PROGRAMS**

Travellers may participate in frequent guest point programs
- However, the traveller’s desire to earn frequent guest points cannot be a reason for selection
- Frequent guest points earned while travelling on company business may be used for personal travel.
F. Car Rental & Other Ground Transportation

F1. USAGE

GROUND TRANSPORTATION USAGE

Travellers are expected to select the lowest cost ground transportation option for business travel. As such, car rentals are permitted. Each entity will define the threshold for car rental versus personal car use.

Drivers must ensure they have an appropriate licence for the visited country and are familiar with local traffic regulations. The agency will provide all relevant information concerning the local rental contract options to be applied.

Usage of taxis or public transportation or specific transportation means is mandatory where traveller safety concerns may exist.
  • To be determined by local entities
When arriving from a large time difference flight, or long journey, traveller will not use personal or rental ground transportation for safety reasons.
  • To be determined by local entities

CAR TRAVEL VERSUS AIR OR RAIL TRAVEL

For security and safety reasons, long car trips and car trips in risky areas are prohibited
  • Local Entity rules to be applied
  • See updated information provided by security department for risky areas

French Example:

Mandatory Rules:
  • Category ECO Mandatory : category B <3 =S= travellers
  • Category Compact authorised : superior 3 travellers =S=

EcoDriving :
  • In order to make savings, the traveller has to refuel before the car restitution
  • Avoid the car rental in airport.
French Specificities

For your professional trip

- Under 100km (single trip or round trip in a day) you can use your personal car or public transports.
- Superior at 100 km (single trip or round trip in a day) you have to use a short term car rental or the public transports when they are available.

Short Term Car Rental
Cars from the category B are mandatory. For the other categories, you have to respect the recommendations. Write behind the rental invoice the passengers identity, their company in case of superior class rental.
See the “EuropCar rental Guide”.

Back from an international trip
For a traveller who has made a trip with a jetlag superior to 4 hours, or a flight superior to 6 hours, it is forbidden to drive as per the Schneider Electric security policy. The traveller will take the public transports if they are available, or a taxi.
F2. BOOKING CLASS

CAR RENTAL CLASS/SIZE BOOKING RULE

Short term car rental will be strictly adapted to the need in terms of size (number of people) and distance. The lowest category answering this requirement will be chosen.

F3. VENDOR & RATE SELECTION

NEGOCIATED FARE REQUIREMENTS

Schneider Electric Group has established negotiated discounted car rental and other ground transportation rates with specific suppliers. Usage of these rates is mandatory in all cases. Booking non group selected car rental and other ground transportation suppliers/rates is not allowed except when selected suppliers are not available.
G. Other Travel Related Expenses

G1. REIMBURSABLE CHARGES

TRAVEL RELATED EXPENSES

The following incremental expenses are normally reimbursable when they are directly related to business travel:

- Meals
- Passport & visa fees
- Parking
- Tolls
- Business office expenses (Internet connection, fax, copies, mailing….)
- Currency conversion fees
- Laundry, dry cleaning, suit pressing for long trips (more than 5 Business days)
- Certain expenses may be claimed whilst travelling on company business. Specific policy and guidelines on expenses are available in the entities.

MEALS

Entities must set a clear rule and limitations for meal expenses

Three cases should be distinguished:

- Employee meals when travelling alone
- Group of employee meals for business internal purposes
- Meals with external people (customers, suppliers, partners….)

In the second and third case, the following rule will be applied:

- When more than one Schneider Electric employee is present, the highest-ranking employee of the group should pay with his / her corporate card and report the expenses on his / her expense report. A manager should not have a subordinate incur the expense for a group meal.
- When a Schneider company restaurant is available on a Schneider site, the traveller must choose it and not report the invoice on the expense report

FRENCH EXAMPLE

Spécificités territoire France

Région Parisienne : repas midi 20 € - repas soir 30 €
Province : repas midi 15 € - repas soir 25 €

Les repas doivent être pris aux restaurants d'entreprise s'ils existent (ces frais ne doivent pas apparaître sur la note de frais), sinon limites idem ci-dessus
Dans le cas d'un repas rassemblant des personnes appartenant à une même hiérarchie, c'est au hiérarchique de rang le plus élevé de payer (règle dite du "père de famille") avec la carte corporate.
G2. NON-REIMBURSABLE CHARGES

All expenses that are not in direct relation with the Business Travel will not be reimbursed by the Company.

- Detailed list to be established by each Entity when needed
H. Expense Management & Monitoring

H1. FORM OF PAYMENT

CREDIT CARD AND OTHER FORMS OF PAYMENT

It is mandatory that Business travel expenses directly incurred by travellers will be paid using the individual company corporate card when available and accepted by the establishments.

Use of Company Corporate Card is not allowed for personal expenses.

H2. EXPENSE MANAGEMENT & REPORTING

The traveller will report his/her expenses on a monthly basis for manager approval. Managers will do a monthly follow-up of travel expenses.
I. Security

I1. TOOLS & TRACKING

TRAVELLER TRACKING

Schneider Electric security tracking tools and services are provided by an approved travel agency. That’s why, in order to ensure traveller security, booking through the agency or the self booking tool is mandatory in addition with self-declaration on the dedicated tracking tool (if required by local travel policy).

AIR CARRIERS SELECTION

For international flights, the approved travel agency will never propose any officially black-listed companies to travellers.

For domestic flights, only companies that are considered safe by the approved travel agency will be proposed to travellers.

The approved agency will provide the traveller with all relevant information.

I2. TRAVEL INSURANCE

All international travellers are granted security and medical emergency assistance with repatriation if necessary. All information about insurance policy, and procedures in case of emergency, are locally provided to travellers under country liability.

- To be defined by local entities
I3. INTERNATIONAL REGULATIONS & ENTRY DOCUMENTATION

INTERNATIONAL HEALTH REGULATIONS AND INOCULATIONS

Before departure, all international travellers must be aware about health regulations and recommended inoculations for countries they are visiting.

- Updated information is locally provided either through the approved travel agencies websites, or through dedicated Schneider Electric intranet tools
  - To be adapted by local entities
- As a minimum, World Health Organization recommendations (available on WHO internet website) have to be followed by international travellers.

Frequent Travellers may benefit from a specific health care follow-up

- To be defined by local Entities

**Mandatory before travelling**

- Register on the International SOS website: [www.internationalsos.com](http://www.internationalsos.com)
  - mandatory when you travel to a RED or ORANGE country
  - highly recommended for other trips
- Consult Schneider Electric intranet for security advices
  - Access path: Swebi → Useful Links: Travel Security → Travel Policy & Procedures → Travel Guidelines

For the procedure details, please go to the Schneider Electric Security website

**EMERGENCY SITUATIONS**

Prior to their travel, all international travellers must consider eventual emergency situations that may occur during their mission. In order to be well prepared, Schneider Electric intranet tools on security matters give specific advice that must be read prior to departure.

International travellers must ensure that they can be contacted rapidly and easily and that they are able to reach key people such as:

- Emergency phone number provided by Schneider for emergency security and medical assistance (according to specific insurance policy for international travels)
- Their direct manager
- Their human resources manager
- Their citizen-related embassy in the country they have to go to
- The country security manager or OD security manager or group security manager

These phone numbers must be stored on the traveller’s cell-phone, and a hard copy (printed copy) of these numbers must be kept handy at all times throughout the journey.
A copy of passports, driving licence and other relevant official documents should be made and stored separately from the originals.
J1. COMMUNICATION AND DISTRIBUTION OF POLICY

It is the responsibility of each traveller to comply with this policy and to justify exceptions with adequate and reasonable explanations. To facilitate knowledge of and compliance with the stated rules & guidelines of this policy, this policy is accessible on the Corporate and Entity Intranet sites.

It is the responsibility of each entity to communicate the updated travel policy to their employees

- Local Human Resources Departments will communicate the information to all employees at each update of documents.
- Managers will ensure that information has been received and understood by his/her direct reports

J2. MONITORING, CONTROL AND ENFORCEMENT OF POLICY

The Human resources Departments of the local entities are the owners of the local entity business travel policies, rules and procedures.

An annual review (minimum) will be done to update all relative documents

At global group level, under the leadership of Schneider Electric global Human Resources, the business travel policy committee will ensure a regular review of all available policies and documents in order to ensure a permanent coherence and work on convergence of local Entity policies