



Travel and Expense Reimbursement Policy

1. POLICY – PURPOSE AND SCOPE

The purpose is to establish corporate policy and procedure with regard to employee travel, business, entertainment and related expenses reimbursed by Marathon Asset Management (“Marathon” or the “Investment Manager”).

Objectives:

- Ensure all employees have a clear and consistent understanding of policies and procedures for business travel and entertainment.
- Provide business travelers with a reasonable level of service and comfort at a reasonable cost.
- Maximizes ability to negotiate discounted rates with preferred suppliers and reduce travel expenses.

Please note that the dollar limitations and guidelines specified herein are general guidelines. The Investment Manager retains the discretion to alter those limitations for a given expense in consideration of the seniority of the person, the reason for incurring the expense, the city and country where the expense is incurred and the business purpose for the expense.

2. POLICY STATEMENT

All necessary, reasonable and authorized travel and entertainment expenses incurred while engaged in conducting business will be reimbursed to employees and contractors pursuant to guidelines and procedures.

All employees are urged to use prudent business judgment while traveling on business and when booking airfares, car rentals, hotel, and other items. All employees are expected to utilize funds in the most cost-effective manner possible taking into account a reasonable consideration of length of flight, time management and the cost and value of goods and services.

3. TRAVEL RESERVATION METHODS

All air, lodging and car rental reservations including en route changes should, to the extent practicable, be booked through the designated on-line booking tool provided by the Frosch Travel Agency (the “Travel Agency”) <http://www.froschtravel.com> if possible.

This process allows for systematic tracking of all travel reservations while providing a knowledge base of an employee’s in transit status. This system is especially critical during times of emergencies when the need exists to determine the whereabouts of all travelers.

4. AIR TRANSPORTATION

1. General Guidelines

- a. Commercial air travel reservations should generally be made using coach or economy class fares. Business class may be booked by a Managing Director and above. Exceptions may be permitted subject to approval.
- b. Upon request, the original receipt portion of the airplane ticket along with the itinerary should be submitted with the expense report. An electronic ticket may be substituted for the foregoing.

5. GROUND TRANSPORTATION

- a. Personal vehicle expenses incurred while conducting business will be reimbursed to the employee at (\$0.40/mile). Only actual mileage is reimbursed.
- b. All ground transportation should, to the extent practicable, be booked through the Travel Agency. Cars should be rented by employees only when other means of transportation are unavailable, more costly, or impractical. The use of a rented car must be justified as a business need and not as a matter of personal convenience.
- c. When a rental car is required, compact cars are preferred unless, for example, the number of passengers or the volume of luggage/packages suggests a larger vehicle is more suitable.
- d. If originating from the NY area and departing from home, please consider driving to the airport and utilizing the long-term parking rather than booking a car service.
- e. Accidents – All automobile accidents, forced entry, or vandalism while using a rental car on business must be reported immediately to the auto rental agency and to the head of Human Resources.

6. LODGING

- a. Reasonable lodging expenses will be reimbursed when the trip requires an overnight stay.
- b. The Travel Agency has negotiated hotel rates available at certain hotels. Employees should utilize these hotels whenever feasible.
- c. The detailed hotel invoice must be submitted for expenses reimbursement.
- d. For hotel stays please attach a copy of the hotel bill with the breakdown of the charges applied. Movies, dry cleaning and telephone charges (other than for emergency business) are not reimbursable.

7. MEALS

- a. Out-of-town meals are generally reimbursed for reasonable expenses.
- b. All meal expenses must be individually recorded on the expense report and must include detailed receipts.
- c. Business meals and entertainment should not be excessive or lavish and should be necessary to conduct business.
 - The following information must be included on employee expense reports as support for all business meals and entertainment expenses: Name, title, of attendees; Name and location of the establishment where the event took place; Amount and date of the expense.

8. TELEPHONE

- a. If you are going to be traveling please make sure your personal digital assistant ("PDA") is set up for voice service and international service if necessary. If you need any assistance with your PDA, please contact the Help Desk.
- b. Calling cards or using your personal cell phone are also acceptable ways to communicate when traveling and are fully reimbursable.

9. OTHER REIMBURSABLE EXPENSES

- a. Tips/Gratuities for taxi. Tips should be reasonable and not exceed 15%.
- b. Necessary parking and toll expenses.
- c. Travel by taxi, train, or shuttle requires a receipt, documenting the date, point of origin, destination and the fare.
- d. Passport/Visa fees and inoculations required for international travel.
- e. Long-term economy parking rates when leaving personal vehicles at airport for more than one day (only when approved and necessary).

10. NON-REIMBURSABLE EXPENSES

- a. Air phones available on airplanes are reimbursable only in emergencies and for reasonable business use.
- b. Airline or hotel club fees.
- c. Personal car repair, maintenance or insurance.

- d. Parking and traffic fines for any violations (moving violations, tickets, parking fines, etc.) incurred while on business are not reimbursable.
- e. Companion or significant other travel.

11. POLICY CHANGES

Marathon reserves the right, in its sole discretion, to revise, modify, delete or add to any and all policies, work rules, or benefits stated in this document. Such changes may only be made in writing and must be approved by a member of the Executive Committee, the CCO or the CFO. No statement or promise by a manager or department head may be interpreted as a change in policy unless it is approved in writing by an Executive Committee Member, CCO or the CFO.