Travel & Expense (T&E) Policy
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1 **Introduction/Statement of Purpose**

This Travel and Expense ("T&E") policy is designed to outline the reimbursable business expenses that Home Point Capital LP and subsidiaries (collectively, the "Company") employees are entitled to, with proper manager approval and valid receipts. It is recognized that there may be expenses which need to be reviewed on a case-by-case basis as an exception to the stated policy and employees are expected to provide all necessary documentation during said review.

2 **Company Expectations & Policy Compliance**

Employees are expected to adhere to this T&E policy when making any purchases on behalf of the Company, including travel arrangements for business trips. While this policy contains suggested expense limits, we expect all employees to use professional judgment while incurring expenses and strive for the lowest cost for the Company.

Managers approving expense reports are responsible for reviewing the report and receipts for policy compliance. Questionable expenses should be addressed with the employee prior to approving the expense report and the findings should be attached to the report if they are outside of the policy but approved. This will allow accounting to review the research already conducted during audit and process the report with less delay.

Employees who do not comply with this policy may be subject to delay or withholding of reimbursement and/or disciplinary action.

3 **General Guidelines**

Generally, request for expense reimbursement should be submitted monthly, however expenses must be submitted within 90 days of occurrence, with all required receipts and supporting details. Reports will then be routed to the employee manager for review and approval, and accounting will audit for policy compliance. Once approved and audited, the reimbursement will be made directly to the employee bank account within 5 business days. No checks will be issued for expense reimbursements. Any expense submitted past this 90-day deadline will not be reimbursed to the employee, regardless of business validity.

Itemized receipts are required for all expenses $25 or greater; credit card statements are not valid receipts. Additional details surrounding certain expenses (i.e. meals) may be required; see individual expense type sections below.

Any manager having a reasonable business reason for delegating their approval authority to another employee, must have their delegation request approved by their accountable Executive and the Controller or CFO prior to making the change. Any expense report approved by a delegated approver on behalf of the actual manager will not be processed unless that delegated approver is on the exception list of non-standard approvers maintained by the Finance Department.

Expensify allows the systematic delegation of approvals and submission functions, the setup of which can be coordinated with Accounts Payable.
4 Personal and Accompanied Travel Expenses

Individuals traveling on behalf of the Company may incorporate personal travel or business with their Company-related trips; however, Personnel shall not arrange Company travel at a time that is less advantageous to the Company or involving greater expense to the Company in order to accommodate personal travel plans. Any additional expenses incurred as a result of personal travel, including but not limited to, extra hotel nights, additional stopovers, meals or transportation, are the sole responsibility of the individual and will not be reimbursed by the Company. Personal expenses or those associated with the travel of an individual’s spouse, family or friends will not be reimbursed by the Company.

REIMBURSABLE EXPENSES

5 Travel Related Expenses

5.1 Airfare

Flights should be booked as soon as possible, especially prior to 14 days of travel the travel date. Flight or seat upgrades will not be reimbursed by Home Point Financial, unless a clear business need is provided. Expenses for access to airline clubs or lounges are non-reimbursable at any time.

In flight Wi-Fi is only permitted as business needs dictate, so that the employee can work while in transit.

Personnel traveling on behalf of the Company may accept and retain frequent flyer miles and compensation for denied boarding for their personal use. Individuals may not deliberately patronize a single airline to accumulate frequent flyer miles if less expensive comparable tickets are available on another airline.

5.2 Accommodations

Room upgrades, access to fitness areas, and in-room movies will not be reimbursed. See Section 7 for full list of non-reimbursable expenses.

5.3 Ground Transportation/Mileage

Rental car classes that will be reimbursed are: economy, compact and intermediate. Upgrades that increase the cost of the rental will not be reimbursed. GPS, satellite radio and other ancillary options will also not be reimbursed. Insurance should be purchased only if you are not covered under another policy. Refueling should be done prior to rental drop-off, unless the pre-paid fill price was comparable to the going rate of gas in the area.

Taxis/Uber/Car Services are reimbursable when traveling without a rental car or personal vehicle. Employees are expected to use their best judgement when choosing between these three options, taking into account cost to the Company, timing of arrival, and personal safety.

Parking is reimbursable if there is no public parking available. Tolls while traveling are reimbursable and a receipt should be obtained if possible, but not required. The costs of parking tickets, fines, car
washes, etc., are the responsibility of the employee and will not be reimbursed. On-airport parking is permitted for short business trips. For extended trips, employees are advised to use off-airport facilities.

Mileage will be reimbursed at the current year IRS rate, based on miles traveled. Any mileage claims over 500 miles need to be supported by a map or route document. Mileage cannot be claimed when driving a rental car, only personal vehicles. The mileage for an employee’s typical daily commute to and from their home to office must be subtracted from claimed miles.

6 Meals & Entertainment

6.1 On-site Meals with Home Point Financial Employees
Meals brought into a Home Point office for two or more employees are permitted on an occasional basis. Attendees and purpose of meal will be required for reimbursement, along with itemized receipt. Any meal expense that does not have an itemized receipt will not be reimbursed. The Company asks that employees use discretion when bringing in meals for employees and limit it to on-site training sessions, reward for performance, and the like. The standard reimbursement for on-site meals should not exceed $15 per person, including tax, delivery and tip.

6.2 Meals while Traveling
Meals during business hours are reimbursable, as long as they are accompanied by an itemized receipt. When dining with a colleague, the senior-most employee must pay the bill and expense the meal. Employees should use discretion when incurring meal expenses while traveling. Employee managers are responsible for addressing meal expenses deemed excessive with their employees prior to submission for reimbursement. Accounting will review meal expenses incurred while traveling for reasonableness and may require additional information for expenses deemed excessive and/or decline reimbursement of excessive meal expenses.

6.3 Meals with Clients/Entertainment
Reasonable expenses incurred for business meetings or other types of business-related entertainment will be reimbursed as such only if they qualify as tax deductible expenses for the company. As part of completing the Expense report, detailed documentation for any such expense must be provided, including:

• Date and place of entertainment.
• Nature of expense.
• Names, titles and corporate affiliation of those entertained.
• Vendor receipts (not credit card receipts or statements) showing the vendor’s name, a description of the services provided, the date, and the total expenses, including tips (if applicable).

Single date events (sporting events, concerts, etc.) attended with clients are permissible but must include who attended and what company they are from. Season tickets or multiple date events are
7 Other Types of Expenses
7.1 Phone and Internet
Personal cell phone, home phone, internet or fax lines will not be reimbursed by the Company for employees that work remotely, in accordance with company policy.

7.2 Loan Related Expenses
Loan related expenses should be processed through Accounts Payable by way of invoices or check requests. Expenses associated with a loan that cannot be invoiced and paid through Accounts Payable or are of an urgent nature can be submitted on an expense report. The loan number and borrower name must be included on the support for the expense.

7.3 Conference/Training/Business Meeting Expenses
Costs associated with conferences, training, or other business meetings must be pre-approved by management and should be paid through Accounts Payable, whenever available. If payment cannot be processed through Accounts Payable, it is permitted to put through on a T&E. However, you should work with AP to try to convert the vendor to invoicing in the future.

7.4 Tips/Gratuities
Reimbursement of tips and gratuities is permitted, as long as they are reasonable and associated with a meal or hotel stay. Meal tips should not exceed 20% and accommodation housekeeping gratuities should not exceed $3/day.

7.5 Charitable Contributions
All charitable contribution requests must be pre-approved and can be done by submitting through the marketing portal. If approved, direct payment to the organization will be made by Home Point Financial. There will be no reimbursements issued for charitable contributions made directly by employees.

7.6 Office Supplies and Remote Office Equipment
The Company will not reimburse employees for any office supplies or equipment purchased. Supplies are available in all Company locations and additional orders should be placed through our corporate account. Any additional equipment purchase requests should be made through the IT ticketing system. Ordering of supplies should be coordinated with the individual responsible at each company location using one of the Company’s national vendor accounts.

Full-time Remote Employees
Full-time remote employees may submit reasonable office supplies for reimbursement. Full-time remote employees will not be reimbursed for equipment purchases. Equipment and computer
related items should be requested through corporate/IT.

7.7 Marketing Expenses
Marketing expense over $250 including, but not limited to, the following must be submitted to the Customer Acquisition Strategy (CAS) team for approval and payment processing. No personal reimbursements will be made on submissions to Expensify above the $250 limit.

- Zillow co-marketing
- Closing gifts
- Lead purchases
- Direct mail
- Sponsorships
- Realtor gifts
- CRM (lead tracking) subscription fees
- Conventions
- Creative development service or contractors

8 NON-REIMBURSABLE EXPENSES
Examples of Non-Reimbursable Expenses:
- Memberships – airline clubs, AAA, country clubs, etc.
- TSA Pre-check
- Season event tickets
- Vendor bills
- Flight or rental car upgrades
- Child care, babysitting, house-sitting, or pet-sitting/kennel charges
- Commuting between home and primary work location
- Costs incurred by traveler’s failure to cancel reservations in a timely manner
- Personal grooming services or supplies
- Laundry, dry cleaning or clothing purchases
- Personal entertainment expenses (magazines, in-room/in-flight movies, health club access, etc.)
- Other expenses not directly related to the business travel
- Travel for non-employees
- Excess alcohol purchases, inclusive or separate from a meal expenses
- Expenses not accompanied by an itemized receipt, with the exception of parking/tolls
- Mini-bar, liquor or bar costs
- Personal car care activities such as car washes, parking tickets, auto maintenance or repairs
- Expenses submitted after 90 days
- Meal expenses without both the itemized and final receipt, along with attendees listed
- Headshots/Photographs of personnel

9 Exceptions
All exceptions to the policy require approval from the employee manager and/or the appropriate executive or their delegates and when necessary, the Company CEO in advance.
10 Enforcement

Managers will be expected to advise employees on appropriate spending practices prior to the employee’s first expense report submission. Managers should continue to coach employees on improving cost management throughout the employee’s time at the Company. Communications that apply to all employees whom submit expense reports will be distributed occasionally and employees are expected to review and maintain current knowledge of the policy and any changes to it.