

# HAZARDOUS TRAVEL POLICY

## REGION: GLOBAL

### *Violations of Policies*

The policies listed in this policy cover a range of topics some more serious in nature than others. If you become aware of any violation of policy by anyone, particularly any violations involving discrimination, the intimidation, harassment or sexual harassment of another employee, customer or vendor, you are required to report the violation to your manager or the Human Resources Department immediately.

### *Restricted Regions List*

The Company maintains a list of locations worldwide that pose travel risk. No employee can be required to travel to a location on this list nor are they permitted to participate in international activities in locations on the restricted regions/embargoed countries list unless an exception is granted by the Company. This list follows the guidelines set by the Department of State and can be found here: [https://www.pmdtc.state.gov/embargoed\\_countries/](https://www.pmdtc.state.gov/embargoed_countries/).

The Company recommends avoiding travel to countries or regions that are:

- Countries with a current U.S. Department of State Travel Warning
- Countries with locations that have an International SOS travel risk rating of High or Extreme, regardless of whether or not there is a U.S. Department of State Travel Warning
- Countries with a CDC Travel Health Notice: Warning Level 3

Locations on this list are evaluated for risk and assigned to a category as described below:

- Category 1 – Extreme Risk: International locations with an International SOS travel risk rating of Extreme.
- Category 2 – High Risk: International locations with an International SOS travel risk rating of High; all locations with a CDC Travel Health Notice: Warning Level 3.
- Category 3 – Medium Risk: International locations with both a U.S. Department of State Travel Warning and an International SOS travel risk rating of Medium or lower
- Category 4 – Variable Risk: International locations where part of that country has an International SOS travel risk rating of High or Extreme, yet there is no U.S. Department of State Travel Warning. Company staff may proceed with planned travel with no formal Company review or restrictions but the Company will not require any team member to travel to any destination that presents and risk beyond what would be considered travel in due course of business.

The Company makes its best effort to monitor these categories regularly and guidelines may be updated by the Company whenever specific conditions warrant. Please note that absence of a country from the Restricted Regions List does not indicate that a location is safe or without travel risk.

For additional information about International SOS ratings and travel risk may be found here: <https://www.internationalsos.com/risk-outlook>. In addition, more detailed information about CDC Travel Notices may be found here: <https://wwwnc.cdc.gov/travel/>.

### *Travel Request Process*

The travel request process for travel to what may be considered hazardous remains largely the same as any standard travel request. You may request an exception to travel to a restricted region or hazardous area which will be reviewed by Company management. The Company makes the final decision about such travel which is not eligible for appeal. Travel will usually be approved when there is a compelling enough justification and no suitable alternative opportunities exist. All requests must be strongly linked to business objectives and must adequately address major health, safety or security concerns.

### *Sudden Change of Condition(s)*

Though uncommon, it is possible that programs or activities abroad would need to be modified or suspended by the Company due to a sudden change of condition. In making this assessment, the Company will consider: 1) the risks associated with continuing the activity at that location; 2) the risk management plan for employees involved; and 3) the value of the travel to the business in that specific location.

In circumstances where employees are perceived to be in imminent danger and immediate action is required, management has the authority to suspend the affected travel or activities immediately and initiate evacuation proceedings.

### *Change in Circumstances after Approval*

If travel plans are adjusted after Company approval has been granted, the traveler is responsible for contacting the Company's designated travel vendor to arrange for travel home. If circumstances dictate an urgent departure, employees are approved to use the most easily accessible resource(s) to arrange for travel to home country or to an alternate safe place.

### *Recommended Registration with International SOS (ISOS)*

Anyone traveling on Company business should enroll in the International SOS system and complete travel registration with International SOS on their website directly.

### *Penalties for violations of the travel policy*

The Company will not support or reimburse for travel that takes place without adhering to the requirements of the Company's Travel & Entertainment Policy. Without these guidelines, the Company cannot protect the safety of its employees. Adherence to this and other policies is our way of keeping our team members safe.

### *International Travel Compliance Issues*

Export Control Regulations – Certain types of technology, equipment, software, and even presentation materials may require a federal license if transported outside the U.S. For expert guidance, see the US Export Controls website: <https://www.state.gov/strategictrade/resources/c43182.htm> well in advance of travel.

### *Incident and Claim Reporting*

Employees who suffer an on-the-job injury while traveling abroad are advised to take the following steps as soon as reasonably practicable:

- Seek emergency medical care as needed for treatment of injuries.
- Notify your manager and Human Resources of the injury and your medical status.
- Ask your Human Resource Business Partner to complete an Injury Report and submit it to our Workers Compensation Carrier or other Services as soon as possible.

### *Other Links and Resources*

- [U.S. State Department Travel Information](#)
- [U.S. State Department Smart Traveler Enrollment Program](#)
- [Centers for Disease Control Traveler Health Information](#)

I have read the above, *Hazardous Travel Policy (Global)*: \_\_\_\_\_ (initials)