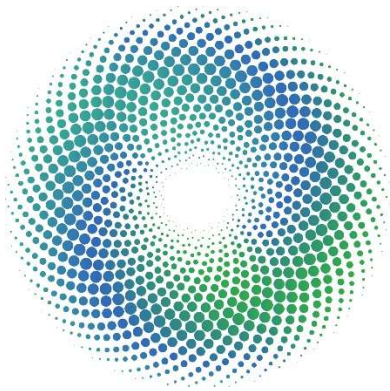


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Travel and Expense (T&E) Reimbursement Policy for Non-Field-Based Teams

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OVERVIEW

Applicability

This Travel and Expense (T&E) Reimbursement Policy applies to Eyenovia, Inc. corporate employees who travel on business or seek reimbursement from the Company for business expenses and may include those contracted by Eyenovia in a consulting or temporary capacity.

Specifically, the teams and roles in-scope for this policy are non-field-based teams.

For any questions concerning Eyenovia’s T&E policies, business practices, or processes, contact the Human Resources and/or Finance Departments.

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Objectives

This Policy is designed to:

- Appropriately balance traveler comfort, convenience, safety and the significant cost of business travel in a fair and consistent manner;
- Ensure that all employees have a clear and consistent understanding of the policies and procedures for business travel and related expenses;
- Maximize the Company’s ability to negotiate discounted rates with preferred suppliers and reduce overall travel expenses; and
- Maintain compliance with tax regulations and other legal requirements.

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GENERAL REQUIREMENTS

Policy Statement

While some travel is appropriate and required, all employees are responsible for evaluating every trip to ensure the expense is justified and that appropriate alternatives to travel (such as video and teleconferencing) have been considered.

Travelers are expected to exercise common sense and sound business judgment in incurring expenses on behalf of the Company. Travelers must also ensure that expenditures are directly connected to or pertain to the transaction of Company business, are properly documented, and are supported by original receipts.

In general, employees will be reimbursed for reasonable business expenses (as defined throughout this Policy) incurred in the performance of their job duties. In order to be eligible for reimbursement, employees must:

- Provide invoices and/or receipts for claimed expenses; and
- Submit timely and accurate expense reports with detailed description of each expense and required documentation.

Eyenovia reserves the right to refuse reimbursement of inappropriate or excessive expenses incurred in violation of this Policy and/or any other Eyenovia policies and its related procedures or to seek reimbursement from employees for inappropriate claims.

Manager/Travel Approver Responsibilities

Managers and designated Travel Approvers are responsible for:

- Ensuring that employees have read and understand this Policy;
- Verifying compliance prior to authorizing expenditures or approving an expense report;
- Timely approval of submitted expense reports;
- Reviewing departmental T&E expenditures for reasonableness and alignment with business objectives; and

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- Addressing policy violations with employees by taking appropriate disciplinary action, seeking reimbursement as necessary and working with Human Resources when required.

Exceptions

Any exceptions to this Policy must receive advance written approval from a Department Head with notification to Human Resources, Corporate Controller, and Staff Accountant.

Non-Reimbursable Expenses

In addition to other prohibited expenses as identified in this Policy, the following expenses are not reimbursable:

- Expenditures for illegal activities;
- Gifts to employees (with the exception of illness or bereavement for the employee and the employee's immediate family members).
- Travel costs from home to primary business location (except where required by contract or local statute, or where otherwise permitted by this Policy);
- Personal credit card/ATM fees;
- Ancillary hotel charges lacking business purpose (e.g., in-room movies);
- Laundry and dry cleaning on trips less than five consecutive days;
- Non- technical newspapers and magazines or personal reading material;
- Personal expenses, side-trips, entertainment and trip/travel insurance;
- Class of airfare, accommodation and ground transportation upgrades;
- Airline and other club memberships;
- Home maintenance, pet boarding and babysitting expenses;
- Gym memberships;
- Personal gas and mileage expenses;
- Late fees, annual fees and/or membership fees for credit cards;
- Personal legal charges and fines/penalties for violation of traffic laws; and
- Loss, theft, or damage to personal property (e.g., luggage, auto, clothing) and associated expenses.
- Any other expense that, at its discretion, Eyenovia, Inc. may deem inappropriate, excessive, or without business purpose.

Consequences of Violations

Failure to comply with this Policy and related policies and procedures may result in delay or refusal of reimbursement, and/or disciplinary action, up to and including, termination of employment.

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This includes failing to repay the Company in a timely manner for any expenses found to be inappropriate or excessive during monitoring, auditing and investigations. Managers/Travel Approvers will be held accountable for approval or authorization of non-compliant or excessive expenses.

MAKING TRAVEL ARRANGEMENTS

Plan Ahead

Travelers are required to plan trips carefully in advance to minimize costly reservation changes and avoid more expensive high season travel. Arrange for necessary travel paperwork (i.e., passports, visas) and file for travel document renewals in a timely fashion to avoid additional costs for expedited delivery. Fees for expedited travel documents will not be reimbursed if such expenses could reasonably have been avoided by adequate planning, as determined by the employee’s manager.

Changes and Cancellations

Travelers should request and record the change confirmation or cancellation number in case of billing disputes. Change fees, no-show charges and cancellation fees will not be reimbursed unless the change or cancellation was for the benefit of the Company and the fee could not reasonably have been avoided. Where appropriate, managers may approve reimbursement of fees incurred for changes necessitated by unforeseen personal circumstances, such as illness or a death in the family.

Personal/Vacation Travel

Personal/vacation travel may be combined with business travel provided there is no additional cost to the Company.

Except for lodging, which may be shared provided there is no additional cost to the Company, all expenses associated with the accompanying traveler are personal expenses, which cannot be expensed.

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Frequent Flyer Clubs

Memberships in airline frequent flyer, hotel frequent guest and other travel incentive programs are considered personal. Employees may retain their travel incentive program benefits. However, participation in these programs must not influence travel selection or result in additional cost to the Company. Joining or membership fees for these programs and travel incentive points from these programs used to pay for business travel will not be reimbursed.

AIR TRAVEL GUIDELINES

Air Travel

Travelers are required to accept the lowest logical airfare available and utilize credits from unused tickets where available. To maximize savings, flights should be booked 14-21 days in advance. **Flights booked less than 7 days in advance should be approved by the employee's Manager prior to booking in order to justify the increased business expense and may require additional justification and/or authorization.**

You are required to fly on behalf of the company to meetings as well as for general business travel; therefore, TSA pre-check is an approved expense if you do not currently hold that status.

Eyenovia has Corporate Air Travel Programs in place with American, United, Delta and Southwest airlines. Ensure you have set up the Eyenovia corporate numbers in your account(s) prior to booking your business travel.

Lowest Logical Airfare Definition

Eyenovia defines the following criteria for determining the lowest logical airfare:

- When a flight with a connection is less expensive than a direct flight, the direct flight may be booked when the difference in fare is less than \$200 USD, or the connection increases the total travel time by more than two hours.
- Lower fares available at alternative airport locations should be considered where practical.

Class of Service

Allowable class of service is based on the following:

- Economy class must be booked for flights less than 3 hours.
- Premium Economy may be booked for flights longer than 3 hours.

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- Business class is permissible when the trip includes an individual flight segment (i.e., one nonstop flight) with a scheduled flight time greater than 7 hours.
- First class travel is prohibited.
- Any air travel arrangements that do not meet the policy requirements will require approval from a Vice President level or higher.

Employees may upgrade their class of travel as a non-reimbursable personal expense. The employee is responsible for the difference between the lowest logical airfare in the allowable class of service and the cost of the upgraded ticket. Personal upgrades may not be expensed.

Reminder: Any exceptions must be preapproved by the Department Head.

Baggage Fees

Trips should be planned carefully to minimize baggage fees. Travelers should review airline baggage policies in advance. When possible, fees should be pre-paid during online check-in.

Employees will be reimbursed for excess/overweight baggage charges only if the baggage consists exclusively of Company property that is necessary for business. In these cases, employees should assess non-airline shipping costs in advance due to the significant expense for excess/overweight baggage.

Overnight Delays

If airline delay results in an overnight stay, the traveler must first attempt to secure complimentary lodging from the airline. If the airline will not absorb the cost due to a forced layover, the expense is reimbursable.

LODGING / HOTEL ACCOMMODATION GUIDELINES

Hotel Reservations

Travelers will be reimbursed for single-room accommodations. Suites and other higher-priced accommodations (such as deluxe views) are acceptable only when approved in advance as essential to the direct conduct of business or when a viable alternative is not available. It is essential to plan appropriately in advance to avoid the circumstance where poor planning results in higher cost.

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Hotel Selection Guidelines

Luxury properties and resort facilities are not acceptable for lodging and business functions.

Tips

Cash tips for bell, concierge, housekeeping and other ancillary services must be kept to a minimum and should not exceed local customary amounts and noted on a receipt.

Health Club/Gym Expenses

In support of the Company’s wellness initiatives, when traveling, daily health club expenses up to \$20 USD equivalent per day are reimbursable where health or exercise facilities are not provided by the hotel or included in the room rate.

GROUND TRANSPORTATION AND RENTAL CAR GUIDELINES

General Guidelines

Taxis and car services (i.e., Uber and Lyft) are an acceptable mode of transportation, but consideration should be given to the use of less costly options such as airport and hotel shuttles. Tips for taxi, shuttle or car service must be included on the receipt and should not exceed local customary amounts.

Rental cars are generally the most expensive mode of local transportation and should be used only when other suitable means are not practical or available. Where several people are traveling together, sharing a rental car may be more cost effective than other forms of ground transportation. Consideration should be given to available options in advance.

In all cases, employees are expected to use sound judgment in choosing the most appropriate method of ground transportation, including consideration of one’s personal safety and schedule constraints. Employees and others traveling together at the Company’s expense are expected to share cars/cabs and combine trips to avoid unnecessary cost. Plan ahead and combine trips to the airport and other common destinations.

Rail Travel

Rail travel is permitted when the cost does not exceed that of acceptable airfare or ground transportation options to the same destination.

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Rental Car Reservations

The car should be rented under the employee’s name with “working on behalf of Eyenovia” added to the contract. Reject an additional insurance coverage offered by the rental company. When picking up a rental car, check for any promotional rates, last-minute specials, or free upgrades. At the time of rental, inspect the car for any damage and note any damage found on the contract before accepting the vehicle. **Do not select or pay for the fuel service option when renting a car as this is not an approved expense.**

The approved rental car category is mid-size/intermediate. A class of service one-level higher may be booked when:

- Transporting customers or three or more employees;
- Cars in the authorized category are not available;
- The traveler can be upgraded at no extra cost.

Returning Rental Cars

Every reasonable effort must be made to return the rental car:

- To the original rental location, unless approved for a one-way rental;
- Intact (i.e., no dents, scratches, or mechanical failures);
- Fueled to minimize rental charges; and
- On time, to avoid additional hourly charges.

Refuel your rental car gas tank prior to returning it. The fuel service option is not an approved expense.

Accidents should be reported immediately to your Manager, HR and Finance; employees should never authorize any accident repairs.

MEAL AND ENTERTAINMENT GUIDELINES

Local and Overnight Meal Expenses (Routine,

Out-of-Town Travel Involving an Overnight Stay (for Routine, Employee Only Travel)

Meal expenses incurred by an employee as defined within this Policy while on legitimate Eyenovia business travel on an out-of-town trip involving at least one overnight stay are to be reasonable and in line with ordinary and necessary living costs relative to the area visited and

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Employee Only Travel)

shall be in accordance with the limits outlined within this Policy. Travelers will be reimbursed for such meal expenses according to actual and reasonable cost where applicable and pre-approved by Eyenovia management, provided that sufficient documentation is submitted, and the expense is approved by the respective manager.

In some cities where costs of living are high, travelers should exercise judgment and choose restaurants and options that are moderate by local standards. Personal meal expenses in excess of these limits will require explanation on expense reports. Travelers attending events where meals are provided should reduce daily meal expenditures accordingly.

For employee travel meals where more than one employee is in attendance, the most senior employee must pay the bill and report the expense along with names/number of employees in attendance and itemized receipt.

The applicable meal expense guidelines are as follows (amounts are per person and inclusive of tax and tip):

Breakfast	Lunch	Dinner	Maximum Daily Amount
\$25	\$50	\$75	\$150

While Eyenovia provides the above suggestions for Breakfast, Lunch, and Dinner meals, under no circumstances shall any meal instance exceed \$150 per person and/or per day, unless otherwise approved in advance and in writing by HR or the CEO. Employees should strive to keep company costs within reason and not spend to the upper limit shown here.

Business Meal Expenses (Not Related to Employee Overnight Travel)

Business meals covered under this section include those that involve a specific business discussion and are taken with current or potential customers (not Health Care Professionals or Government employees), vendors or employees (such as team/departmental meetings, etc.) where not in conjunction with employee travel. Such business meals should be an exception and are not meant for routine matters or when work can be completed during normal working hours. Reimbursement for business meal expenses is based on actual and reasonable cost.

Business meals taken with other employees will be reimbursed when:

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- A customer or other business affiliate is present;
- At least one employee is from out of town;
- Business must be conducted offsite for confidentiality reasons;
- A meal extends a working day due to critical business needs; or
- Authorized by an employee’s manager for testimonial, reward, recognition, or other appropriate business purposes.

For business meals where more than one employee is in attendance, the most senior employee must pay the bill and report the expense along with names/number of employees in attendance and itemized receipt.

Business Entertainment

Entertainment is discouraged and unlawful in some circumstances. Examples of entertainment include events such as nightclubs, theater, and sporting events. Reimbursement for allowable entertainment will be made under the following circumstances:

The person being entertained has a potential or actual business relationship with the Company;

- The entertainment directly precedes, includes, or follows a legitimate business discussion that benefits the Company;
- The provision of entertainment is lawful and permitted if the recipient is a customer or government employee; and
- The entertainment has prior approval from an employee’s manager. If unusually costly entertainment is being considered, prior approval of a Corporate Officer must be obtained.

Entertainment of employees is strictly prohibited unless part of an official, Company sponsored program that has been approved by management and Human Resources.

Meals or entertainment with friends, relatives or business acquaintances solely to keep in touch or to repay previous meals or entertainment for personal or non-business reasons will not be reimbursed.

Entertainment involving Health Care Professionals (HCPs) and/or Government employees is strictly prohibited.

Tips

Tips included on meal and entertainment receipts will be reimbursed and should be within the local customary standards. For group travel or conferences, gratuities for planned meals and other hotel support

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should be included in the meeting sponsor’s bill and are not reimbursable to individuals.

Documentation The following information is required prior to reimbursement for all business meals and entertainment:

- Itemized receipts for amounts of **\$25 or more** (credit card statements are not an approved form of documentation);
- The name and location of the restaurant or event location;
- A complete listing of attendees (including name, title and company);
- The nature and purpose of the event; and
- Any other substantiation required by local tax authorities or other regulations (e.g., state laws).
- In the event that a receipt may not be available for cash tips in amounts under \$25, this should be noted in the memo description on the employee expense report and/or noted on the related receipt for hotel, parking, etc. as an add on.

Refer to the Expense Reporting Section of this Policy for receipt and expense support documentation submission requirements.

Payment When more than one employee is present, the most senior level employee must pay and expense the bill, listing all participants.

TELECOMMUNICATIONS

Telephone and Long-Distance Calls Do not use hotel services to place calls. Hotel telephone charges for long-distance calls will not be reimbursed unless such charges were unavoidable.

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Internet Access Charges

When traveling, Eyenovia will reimburse nominal internet access fees for employees who need to access the internet outside of an Eyenovia facility. Such access must be reasonable and necessary for business.

EXPENSE REPORTING

Deadlines

Travelers must submit expense reports at least monthly and at quarter end they must be submitted within 5 business days of subsequent period. This allows for timely reimbursement to the traveler as well as accurate recordkeeping. The Company will not reimburse any late fees or interest charges due to late expense filing.

Approval/ Authorization Process

Expense report approval is an important control function and should be completed within five days of report submission. Approvers are responsible for reviewing all expenses for compliance with this Policy.

All expense reports must be approved in accordance with the documented expense approval authorization. No employee is authorized to approve their own, their manager's or another team member's expense report.

Expense Documentation (Receipts)

Receipts must include the name of the vendor, location, date, and the itemized amount (for expenses \$25 and over) and purpose/description of the expense. Credit card summary slips/statements are not an acceptable receipt for business expenses; all receipts must include full details of items purchased. A count and listing of meal attendees must also be submitted for meal expenses in the memo line of the expense report. Absence or alteration of this information may cause the expense to become non-reimbursable. This may also result in disciplinary action.

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Expense supporting documentation requirements are as follows:

- All transactions require a description/explanation when entered in your expense report.
- Receipts are required for all transactions over \$10 for which the employee seeks reimbursement.
- **All expenses \$25 and over require an itemized receipt.**
- For business meals and similar expenses, provide the names and positions of all attendees as well as the business purpose in the description on your expense report. This is required as we transition into a commercial organization.
- In the rare event that it is not possible to obtain a receipt, such as for parking meters, tolls, or cash tips, please provide an explanation of the transaction in the description field. If the expense relates to an expense that you have a receipt for (e.g., toll for a rental car, tip for a hotel stay), you can write that amount on the related receipt and submit as evidence.

Please note that additional requirements apply to business expenses incurred in connection with interactions with Government employees. Refer to Eyenovia’s Healthcare Compliance Policy Manual for a detailed description of the requirements and restrictions concerning entertainment, gifts, and the provision of travel, transportation, lodging, meals, and other expenses for Government employees. Contact the Legal & Compliance Departments regarding any questions concerning interactions with Government employees.

Lost or Unavailable Receipts

When a required receipt is not available, a statement of explanation, together with any evidence available to support the expenditure, must be included with the expense report. Actual bills/receipts must be submitted whenever possible. We strongly advise to provide documentation for all expenses and failure to do so will at the very least result in delayed reimbursement of the entire report, if not rejection of the reimbursement request.

The occurrence of lost or unavailable receipts should be an exception. Managers/Travel approvers are responsible for addressing frequent and/or excessive occurrences by their employees/direct reports, as well as addressing policy violations. Refer to the Manager/Travel Approver Responsibilities section for further information.
