

**BROOKLYN BRIDGE PARK CORPORATION
POLICY ON DISCRETIONARY SPENDING
SEPTEMBER 30, 2020**

INTRODUCTION AND PURPOSE

The Board of Directors (“Board”) of Brooklyn Bridge Park Corporation d/b/a Brooklyn Bridge Park (the “Corporation” or “BBP”) has adopted this Discretionary Spending Policy (“Policy”) which shall apply to BBP’s Board and employees.

This Policy is intended to inform all employees as to what is proper discretionary spending, meaning spending that falls outside of other BBP business expense policies. This Policy is not exhaustive but provides examples of proper and prohibited expenditures.

Each BBP employee will be expected to read and understand this Policy and to review it periodically in order to be alert to expenditures that could be contrary to the established policies of the Corporation. Employees should be aware that this Policy should be read in coordination with other BBP policies for expenses, including those set forth in the employee handbook.

PERMITTED EXPENDITURES

Permitted expenditures are those that are for purposes that relate to and support the mission of BBP, its purpose and objectives, and are not in support of the private or personal interests or to the benefit of directors, management or employees. In particular, permitted discretionary expenses often support staff morale, enhance BBP’s support of its human resources, create team building and learning opportunities, and provide opportunities for staff acknowledgements. The following is a non-exhaustive list of examples of permitted expenditures:

- Non-alcoholic beverages, condiments, and refreshments purchased for BBP staff and visitors solely used in BBP’s administrative offices;
- Employee meal expenses for department-sponsored, work-related meetings of which the meal plays a minor role, and which such meeting extends over and beyond typical meal hours;
- Food for a special department-specific meeting, retirement reception, holiday party, or employee recognition event;
- Payment of admission fees to social or business events where attendance is required or recommended as part of an employee’s official duties;
- A gift to acknowledge the birth or adoption of a child to a BBP employee;
- A gift or acknowledgement to thank a BBP Board or Staff member’s service to BBP;
- Plaques, certificates, and awards for BBP-related services; and
- Flowers for deaths of BBP employees or their immediate relatives; or flowers for BBP employees who are in the hospital.

All such expenditures must be reasonable in amount, consistent in amount with comparable expense categories at non-profit organizations, and approved by the relevant department head or the President prior to expending funds.

PROHIBITED EXPENDITURES

BBP may not use funds to purchase items considered personal expenditures or that are intended to personally benefit an employee or director. Expenditures are prohibited if they are personal in nature, would benefit one or more staff of BBP rather than benefit those dependent on BBP’s services, or are not

necessary to advance the mission of BBP. Examples of prohibited expenditures include, but are not limited to:

- Assignment of cell phones or vehicles to non-BBP staff;
- Employee meal expenses in which the primary purpose is social, or in which the meal plays a predominant role;
- Employee birthday, anniversary, holiday gifts, or cards;
- Flowers and gifts for staff except when a staff member suffers an immediate family member loss or is in the hospital;
- Charitable contributions or sponsorships of events not associated with BBP's mission;
- Purchases of alcohol except as part of a permitted event;
- Membership dues in professional or trade organizations on behalf of BBP employees that are not directly related to employee's job function; and
- Personal use of BBP vehicles, unless properly documented for tax purposes.

PROCEDURES FOR REIMBURSEMENT OF EXPENSES

The following is a list of required steps and documentation for permitted expenses:

- Prior to incurring an expense, employee performs due diligence to obtain goods or services at a low cost and maintains records of her/his efforts.
- As noted above, prior to incurring expense, secure approval from the relevant department head or the President.
- Prepare the appropriate expense forms accurately. Expense forms should be completed in ink or typed and must record expenditures incurred on a daily basis. Original receipts and support for the expense vouchers must be attached in the chronological sequence in which they occurred.
- For all business-related meal expenditures, the business purpose, as well as the names of people who were present, must be disclosed and recorded.
- All expense forms must be submitted for payment not later than 60 days from the date the expense was incurred.
- Expenditures must be properly approved in writing as follows: In general, all BBP employees must submit to and have their expenditures approved by: (i) the direct supervisor of such employee, if any; and in his or her absence, the President, Chief Financial Officer ("CFO"), Chief Operating Officer ("COO") or General Counsel. In addition, reimbursements of the CFO, COO and General Counsel shall be approved by the President and reimbursements of the President shall be approved by the Chairperson of BBP.

GUIDELINES APPLICABLE TO REQUIRED SUPPORT OF EXPENDITURES

- Photocopies of receipts are not acceptable unless the original document was lost and a written explanation is attached to the form giving full explanation of the circumstances.
- A receipt is defined as a written acknowledgment that a specific amount, article, or delivery has been made. At a minimum, the name of the establishment, the description of the goods or services purchased, the date, and the amount should appear on the receipt.
- Proof of payment is required.