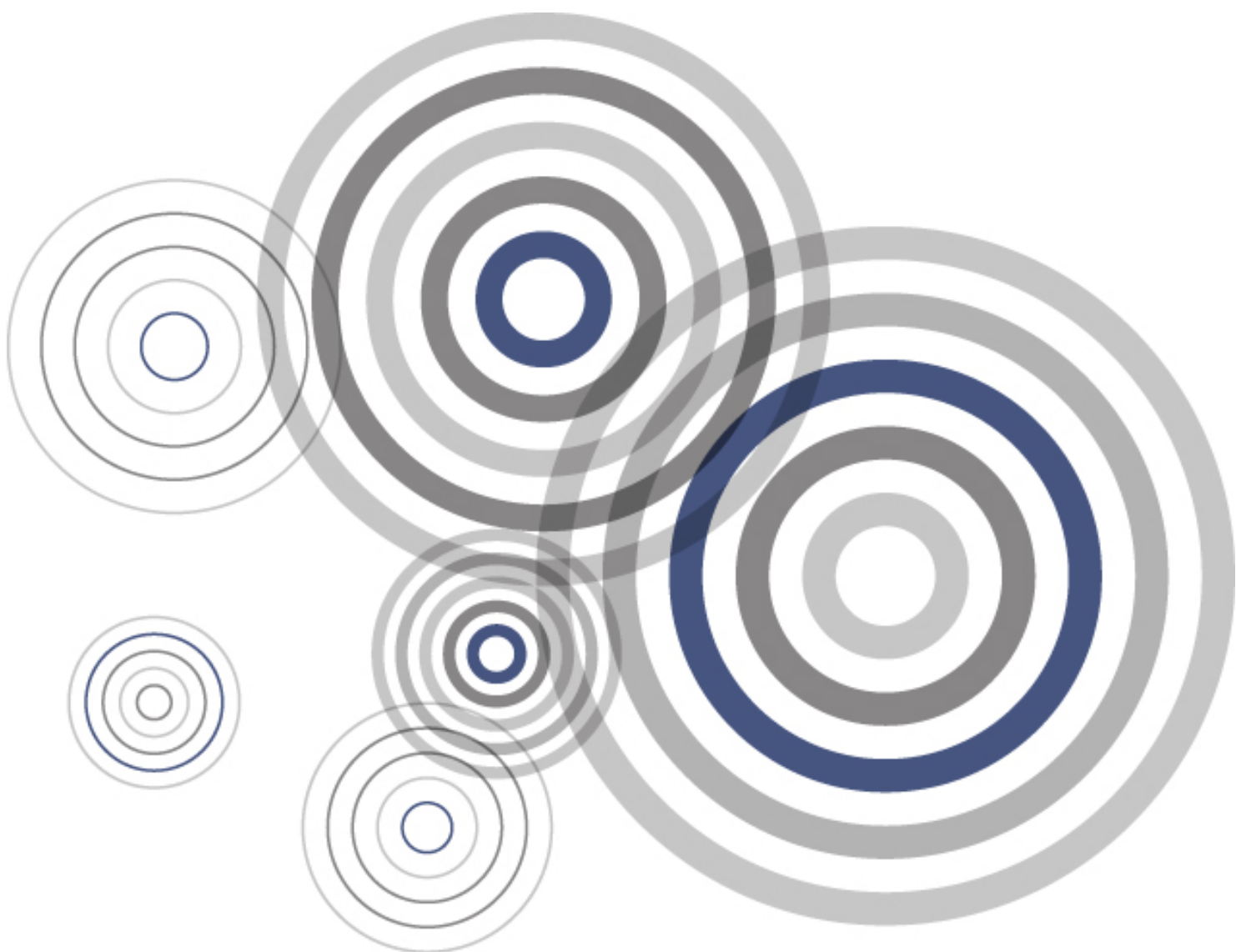


GLEIF public

## **Board Travel and Expense Policy**

Version 2.0, 2020-02-05



## Contents

1. Overview	3
1.1. Purpose	3
1.2. Scope	4
2. Policy	4
2.1. Airfare	4
2.2. Automobiles/Transportation	5
2.3. Hotels	5
2.4. Meals	6
2.6. Non-reimbursable Expenses	6
2.7. Foreign Currency Exchange and Exchange Rates	7
3. Procedures	7
4. Auditing of Expense Reports	7
5. Related documents	8
6. Effective Date	8

Version	2.0
Date of version	2020-02-05
Created by	Committee of Chairs
Approved by	Board of Directors
Confidentiality level	Public

## About this Policy

This document describes the Travel and Expense Policy of the Board of Directors. The Policy relates to ensure a diligent system of reporting expenses for travel of Board Members in the Global Legal Entity Identifier Foundation (GLEIF).

## Change History

This section records the history of all changes to this document.

Date	Version	Description of change	Author
2019-03-27	2.0	The version 2.0 replaces version 1.0 after a periodical review of the policy	Committee of Chairs
2015-06-24	1.0	Approval of the Travel and Expense Policy at Board Level	Committee of Chairs

## 1. Overview

### 1.1. Purpose

GLEIF Statutes Article 19 provides guidance on the reimbursement of costs and travel expenses of Board Members. This policy will establish and communicate standards for the controlling and reporting of Board travel expenses in a manner consistent with GLEIF Statutes. The GLEIF Board recognizes that travel may compromise personal time. It is GLEIF's intent to reimburse Board Members for all reasonable expenditures associated

with the conduct of GLEIF business recognizing GLEIF's obligation to minimize expense wherever possible.

## 1.2. Scope

The intended use of this policy is for all GLEIF Board Members. The guidelines listed below are designed to address usual business travel, entertainment and other expenses. Unusual circumstances may require unexpected or atypical expenses, which are unavoidable. GLEIF asks that good business judgment be exercised wherever possible so that the goal of cost savings is achieved.

## 2. Policy

### 2.1. Airfare

Board Members are free to book their airfare with their chosen carrier and travel service if desired. The goal is to seek the lowest possible fare available for all travel from your local destination to meetings and events. Airfare reimbursement is capped based on the average costs of comparable airfare tickets as calculated by the GLEIF staff.

Any airfare greater than 4 hours in duration (point-to point, layovers are not considered) may be booked in BUSINESS class however this should be the lowest applicable fare. It is suggested that non-refundable fares are purchased whenever possible. GLEIF will reimburse in cases where the Board Member has obtained travel insurance.

First class travel will not be reimbursed.

Travel plans should be made as far in advance as possible to obtain the most favorable fares. Typically, this is at least twenty-one (21) days in advance when possible or immediately upon receiving a meeting announcement. It is understood that it is not always possible to obtain the lowest fare due to timing and circumstances and GLEIF request that Board Members consider GLEIFs cost management principles when making their bookings.

If a Board Member wishes to combine business travel with personal business, this is permissible as long as the airfare booked does not exceed the lowest applicable fare available at the time of booking. Spouses/Significant Others may travel with the Board Member if the Board Member so desires, however, all expenses relating to this will not be borne by GLEIF. This includes room upgrades, additional flights, transportation, meals and the like.

In general, open-ended (one-way) fares are not permitted unless there is a specific business reason to do so. If such a case needs consideration, the traveler should consider booking a round trip and making changes as soon as the actual return date is known. The penalty/change fee is usually less expensive than the cost of the one-way ticket.

In the event that a Board Meeting is cancelled, GLEIF will reimburse Board Members for any non-refundable incurred expenses as of the cancellation date.

In the event that a Board Member cancels attendance at a Board Meeting, GLEIF will consider reimbursement on a case-by-case basis.

N.B: Directors may keep any travel related awards or club points (e.g. Frequent Flier miles, Hotel points, etc.).

## 2.2. Automobiles/Transportation

Airport Taxis, Buses, Subways and the like should be used for local transportation where most convenient and economical. Taxis should be used only when other local transportation is untimely or unavailable, or when heavy luggage is being transported. Reimbursement will be for actual expense, including tip but should not exceed 100-miles/161 km of total distance and based on the average costs.

When required for business purposes, GLEIF will reimburse Board Members for car rentals. We recommend that the rental be for a mid-size vehicle unless the Board Members are sharing it with other Board members or staff. In those cases, a full-size car is appropriate.

Personal cars may also be used as required for business purposes. The use of a personal car and parking costs will be reimbursed at the standard rate established by GLEIF.

Train travel will be reimbursed based upon a round-trip, business class fare. Exceptions for night sleeper ticket shall be brought to the attention of the Board Chair or Vice Chair for review on a case-by-case basis.

## 2.3. Hotels

When required for meetings, Board Members may stay hotels that are reasonably priced and close and convenient to the place where the meeting will be held. Reimbursement will be made for actual costs incurred for accommodations within policy.

GLEIF expects that Board Members will stay at business-class hotels with a reasonable rate. Rather than establish a set guideline value, given that the meeting locations are diverse, GLEIF requests that Board Members use their best judgment when booking. Usually GLEIF offers a choice of Hotels with negotiated rates which should be used for Board travel. Exceptions to this shall be brought to the attention of the Board Chair or Vice Chair for review on a case-by-case basis. As previously stated, GLEIF has been charged with cost reduction wherever possible and this should be a consideration when reviewing options. It is expected that a reasonable accommodation would be a single-room/private bath rate.

As previously noted, any expenses relating to non-Board Members traveling with a Board Member will not be reimbursed.

GLEIF suggests that hotel rooms be ‚guaranteed‘ for late arrival. Board Members are requested to cancel reservations within the time limits of the hotel so that no unnecessary charges are incurred. GLEIF may reimburse such charges on a case-by-case basis.

## 2.4. Meals

Meals are reimbursable while traveling on GLEIF-related business when not provided by the meeting host or GLEIF. It is expected that Board Members will exercise good business judgment. In addition to a receipt, the Board Member is asked to provide a list of all attendees and an explanation of the business purpose of the meal. The cost of a Director’s meals should not exceed \$75 per day.

## 2.5. Other Reimbursable Expenses

Fitness Center Fee: Fees for the use of hotel fitness centers will be reimbursed up to \$20 USD per day.

Gratuities: Gratuities to waiters and taxi drivers and the like should be included in the cost of meals and taxis, respectively. Other gratuities, such as tips to reported by a GLEIF ‘Missing Receipt Declaration’ by the Board Member.

Telephone/Cellphone Calls: Whenever possible, the Board Member is encouraged to use the GLEIF video and VOIP resources in place. Extensive long-distance conference calls should be avoided as feasible. The GLEIF will reimburse Board Members for all reasonable and actual charges directly relating to GLEIF business. Detailed receipts for the calls being expensed must be submitted.

Charges for Baggage (Luggage): Reasonable baggage charges will be reimbursable. Excess baggage is not reimbursable unless that baggage holds GLEIF related records or property.

Expenses without receipt – will be reimbursed after approval and exceptional reimbursement needs to be requested, ideally with other supporting documents.

## 2.6. Non-reimbursable Expenses

Listed below is a list of non-reimbursable expenses that are often incurred while traveling:

- Shoe shining, barber and similar items.
- In-Room Movies and pay services.
- Excess cost of making circuitous or side trips for personal reasons.
- Fines for traffic violations, including parking fines.
- Loss of personal property - clothes jewelry, etc.
- Loss of personal funds or tickets.
- Purchase of clothing or toiletries and similar items for personal use.
- Late/delinquency charges on credit cards for untimely submission of expenses to GLEIF for processing.
- Cost of members of a Board Member’s family traveling with him/her except in

those instances where their presence serves a bona fide business purpose.

- Maintenance and/or repair of personal property while traveling.
- Memberships in social or athletic organizations.
- Purchase of luggage or attaché cases.
- Entertainment of spouses/significant others.

## 2.7. Foreign Currency Exchange and Exchange Rates

Any currency exchange receipts may be submitted for reimbursement of service/commission charges.

All conversion rates used must be clearly indicated on expense reports including the source of the rate used. It can be a published rate or the rate charged directly through a credit card transaction.

As a reminder, all expenses must be submitted for reimbursement within 90 days from the date of the receipts. This policy is intended for to help control the impact of foreign exchange fluctuation.

## 3. Procedures

According to GLEIF's Organizational Regulations, Compliance is overseen by the Governance Committee (GC).

The role of the GC is to provide advice and counsel to the Chair of the Board to support the proper governance of the GLEIF, in particular with respect to its compliance with the Statutes and By-laws and with all applicable provisions of applicable law and regulation. In particular, the GC shall have the duties and competencies to serve as the compliance committee of the Board and in that capacity monitor, compliance with any matters raised by a Board Member, the ROC, the Swiss Supervisory Authority or any other regulatory or oversight bodies.

The GC reviews an annual report from the Compliance Officer which is an assessment of compliance risk within GLEIF operations and the activities of the Compliance Officer in this context.

## 4. Auditing of Expense Reports

The Audit and Finance Committee (AFC) annually requests that its external auditor reviews the travel costs of the Board of Directors in a special engagement and reports any findings to the Board Chair and Audit and Finance Committee.

If non-compliant behavior is observed, the Chair of the AFC has the duty to inform the Chair of the Board of Directors and the Chair of the Governance Committee.

## 5. Related documents

The following RELATED DOCUMENTS table will be maintained and updated accordingly.

### Related Documents

Document Name	Document Type
Board of Directors' Expense Report Form	Form

## 6. Effective Date

This Policy shall enter into force with its publication.