

# Travel & Expense

Reasonable, necessary, and well-documented spending

Travel and expense controls: approval authority, the reasonable-and-necessary standard, documentation, government-official limits, and prohibited expenses

# Why Travel & Expense Matters

Expense reports are where small problems become big ones

## Resources used well

Clear standards keep travel and entertainment spending appropriate and purposeful

## Tax and audit ready

Proper documentation secures favorable tax treatment and withstands audit

## Corruption risk reduced

Limits on gifts and government-official spending guard against bribery

## Consistent and fair

One standard applied across the organization treats everyone equitably

## THE STANDARD

Reimbursed expenses must be reasonable in amount and necessary to accomplish a defined business purpose

# What Gets Reimbursed

Spending must serve the business and stay reasonable

## **Business purpose**

Costs must be necessary to accomplish a defined, legitimate business purpose

## **Lowest logical fare**

Book the lowest sensible airfare; loyalty perks are not exceptions

## **Cost-conscious lodging**

Choose accommodation within budget and book through approved tools

## **Meal budgets**

Daily meal allowances apply, with limited high-cost-city exceptions

## **Nominal gifts only**

Business gifts and entertainment must be nominal, lawful, and proper

## **Approved booking tools**

Use designated systems for flights, hotels, and rental vehicles

# Approval & Documentation

Authority, receipts, and timing keep spending accountable

## Manager approval

Expenses above set thresholds require line-manager or delegate approval

## Threshold automation

Smaller claims auto-process but remain subject to audit and rejection

## Receipts required

Itemized receipts and documentation must support every claim

## Timely submission

Submit claims within 30 days; very late claims are not reimbursed

## Corporate cards

Card statements follow the same submission timeline as claims

## Audit & discipline

Claims face periodic audits; non-compliance can trigger discipline

# What the Company Won't Pay

Personal, punitive, and upgrade costs fall outside the policy

Fines & tickets

Class upgrades

Personal entertainment

Spa & salon

Childcare

Passport renewal

Personal travel days

Loyalty interest

Personal internet

## GOVERNMENT OFFICIALS

Travel, lodging, or transport for an official at or above the threshold requires compliance pre-approval before payment

# Definitions

## **Reasonable & necessary**

Appropriate in amount and required to achieve a defined business purpose

## **Pre-approval**

Advance authorization required before incurring certain higher-value or sensitive expenses

## **Government official**

A public officeholder whose hosting triggers heightened anti-corruption controls

## **Substantiation**

Itemized receipts and documentation evidencing the business nature of a claim

# Questions the Board Should Ask

A few questions test whether spending is controlled

**01**

## **Do approval thresholds and audits scale with risk?**

Right-sized controls catch material issues without burdening routine claims

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**02**

## **How are government-official expenses pre-approved?**

These carry the highest corruption and reputational exposure

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**03**

## **What share of claims lack receipts or timely filing?**

Documentation gaps signal control weaknesses and tax exposure

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**04**

## **Are gift and entertainment limits enforced?**

Ambiguity here is where improper-payment risk most often enters

# Firm Lawyers

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## Matthew Boyden

is a trial lawyer and former federal prosecutor with more than thirty-five years of experience. He represents companies and executives in high-stakes criminal, civil, regulatory, and governance matters, and is regularly engaged where litigation risk, regulatory scrutiny, and institutional exposure intersect. His practice includes federal criminal defense, complex civil litigation, internal investigations, and board-level advisory work, including securities, sanctions and trade controls, anti-corruption, and anti-money laundering.

## Larry Finder

is a trial lawyer and former United States Attorney with more than four decades of experience handling complex criminal, civil, and regulatory matters of national significance. He represents individuals, corporations, and boards confronting serious legal, institutional, and reputational risk. He served in increasingly senior roles at the U.S. Department of Justice, including Chief of the Criminal Division and First Assistant U.S. Attorney, before being appointed United States Attorney for the Southern District of Texas in 1993.

## Ryan McConnell

is a former federal prosecutor and trial lawyer who represents companies, boards, and executives in high-stakes criminal, civil, and governance matters. He has tried nearly twenty federal jury trials and conducted hundreds of investigations involving complex fraud, cross-border enforcement, and sensitive regulatory issues. His practice focuses on federal criminal defense, complex civil litigation, internal investigations, and advising boards and senior executives on matters requiring judgment under pressure.