
Expenses Policy (ROI)

1. Purpose

This policy provides guidance and clarity to employees on appropriate business expenses and the method of authorisation. The aim of this policy is to simplify and standardise the claiming and payment of expenses.

GRAHAM are committed to being an inclusive workplace where all employees, customers and stakeholders can fully participate and contribute. We strive to ensure accessibility across all facets of our operations, including physical spaces, digital platforms, communication channels and services.

Our People policies are regularly audited against rigorous accessibility standards to ensure compliance and to support every employee.

Anyone who requires additional support or has any questions regarding accessibility can contact the HR team at HR-GFM@graham.co.uk

2. Scope

The policy is applicable to all GRAHAM ROI based employees and has been drafted in line with the Revenue guidelines. Fixed term employees should contact HR before making any claim as restrictions may apply.

3. Policy Statement

Expenses will be reimbursed in full for all types of expenditure incurred provided that expenditure was, necessary (the expense is incurred during the course of employment and solely for the purpose of performing the job), reasonable (the individual is expected to treat company money as they would their own) and evidenced by an appropriate receipt.

4. Tax

4.1. PAYE, PRSI and USC

Expense payments and benefits in kind received by employees have to be reported to the Revenue on an annual basis. This is because tax law states that all such payments are considered in the first instance taxable, i.e. liable for Pay As You Earn (PAYE), Pay Related Social Insurance (PRSI) and Universal Social Charge (USC).

The information reported to the Revenue is obtained from several sources, one of which is the expenses claim, therefore all claims must be evidenced with a receipt.

4.2. VAT

VAT on certain expenses will be recovered by the company from the Revenue where appropriate as input tax on business expenditure. It is therefore important that the VAT included on the claim is supported by an appropriate invoice or receipt wherever possible. The information must be retained for scrutiny by the Revenue, any errors found may give rise to an assessment on the company for further VAT payment.

5. Responsibilities

5.1. Employees

It is the employee's responsibility to submit an expense claim to cover all expenses incurred on behalf of the company. Employees are permitted to submit one expense claim per month. Claims should be submitted within 3 calendar months of the expense being incurred.

All expenses should be claimed on the standard ROI Expenses form. All employees must ensure that adequate detail is provided for each individual expense on their claim form to enable a reviewer to determine the exact nature of the expense and reason why it was incurred.

It is the employee's responsibility to ensure that valid receipts are attached to their submission. The company reserves the right to refuse reimbursement of claimed expenses where no receipt has been provided or the expense is deemed not to be a business expense.

In order to facilitate the refund of VAT to the Company, the following rules must be adhered to:

- The invoice or receipt must be attached to the expenses claim form.
- The invoice or receipt must indicate the Company's name and address wherever possible.
- The period and nature of the provision of service must be indicated on the invoice or receipt.
- The price in local currency, i.e. GBP or Euro, must be clearly indicated.
- The VAT amount and VAT number must be included on the invoice or receipt.

In submitting an expense claim, the employee is deemed to have read, understood and complied with this policy.

6. Reimbursement

Cleared expenses will be reimbursed on a regular basis. Expenses will be paid directly into the employee's bank account via the monthly payroll.

7. Authorisation Of The Expense Claim

All completed expense forms should be sent to the central expenses processing team either by post or using the dedicated email account expenses@graham.co.uk.

Entertaining expenses and other ad-hoc or significant items may be routed by the central expenses team to the appropriate Head of Department for authorisation prior to payment.

Expense claims will not be paid if they do not comply with the expenses policy. Non-compliant claims will be returned to the employee with an explanation as to why they do not comply. The employee will have the right to contest this decision by providing explanatory information supporting the claim to the Group Chief Financial Officer.

8. Advances

It is not company policy to issue advances unless in exceptional circumstances. For higher value business related expenses, the company may arrange for these to be processed through the Procurement department.

9. Business Travel

9.1. General

The Company will reimburse all reasonable business travel costs where employees are obliged to incur the costs in the performance of their duties. Journeys between an employee's home and their normal place of work are not incurred in the performance of their duties. Therefore, any payment for a journey between an employee's home and their normal place of work would be subject to tax and should not be claimed as a business expense in any circumstances.

9.2. Air Travel (Refer to *Travel Planning Procedure*)

Air travel is booked centrally via the company travel bookers, in line with the company policy;

UK

All travel to be booked in Economy Class. Full use to be made of Advance purchase air tickets, Off Peak services and economy airlines.

Europe:

All European journeys should be booked in economy class. Full use should be made of advance purchase tickets.

Cancelled Tickets

Costs may be incurred if a booking is cancelled shortly before the travel date. The traveller must contact the travel booker as soon as the cancellation of the trip has been confirmed to avoid any unnecessary costs being incurred.

9.3. Rail Travel

Other than in exceptional cases, rail travel must always be booked in advance via company travel bookers to take advantage of available discounts.

9.4. Season/ Annual Rail Cards

The company policy is not to pay for season/ annual rail cards for employees.

However, the company will provide access to an interest free loan that will be deducted monthly from the employee's salary. If a season ticket loan is provided, it must be repaid in full within the allocated time period.

The card will remain the property of the company at all times and should the employee leave the company they will be liable for reimbursing any outstanding remaining balance either owed as part of a loan or the residual entitlement left on a fully paid card. Any outstanding balance or residual entitlement will be deducted from their final net pay and shall not constitute an unlawful deduction of wages. Should there be insufficient money in an employee's final pay they will be liable to reimburse the amount in full prior to their last day of service.

9.5. Oyster Cards

Reimbursement for use of Oyster cards or travel cards for travel in London may be given provided the employee can prove that they were valid business journeys. The employee should attach to their claim a statement of journeys travelled, highlighting the business journeys, providing locations travelled between and the reasons for those journeys. These statements are available from oyster online weekly/monthly when an oyster card user registers with the service.

9.6. Business Mileage (Refer to *Vehicle Policy*)

9.6.1. General

All mileage claims must be submitted on the standard ROI Expenses form. Employees will be reimbursed for mileage incurred on approved Company business at the appropriate mileage rate in force.

Business travel is defined by the Revenue as employee travel from one place of work to another place of work as part of their duties. This includes:

- travel between Ireland and other countries
- travel to a place that is not their normal place of work.

For business travel, the distance in kilometres is calculated by the lower of either:

- the distance between the employee's home and the temporary place of work.
- the distance between the employee's normal place of work and the temporary place of work.

Mileage cannot be claimed in respect of travel between an employee's home and their normal place of work.

If an employee has any queries regarding their normal place of work or what can be claimed they should contact HR.

9.6.2. **Company Vans**

Employees with company vans should refer to the guidance in the Vehicle policy and the handbook for vehicle drivers for information on business mileage.

9.6.3. **Car Details**

Employees are responsible for informing the central expenses processing team of their vehicle details using the Driver Details form. This applies to both company and private vehicles used for Company business.

9.7. **Other Business Travel Protocols**

9.7.1. **Pool Car**

Wherever possible the use of a pool car should be considered if it would avoid the need to pay other forms of transport which would incur a greater cost. Pool cars are for business use only.

No tax liability will arise on an employee using a pool car provided that the following conditions are met:

The car must be available to and used by more than one employee and must not ordinarily be used by one employee to the exclusion of others.

Any employee using a pooled car must record details of the starting and finishing mileage from the odometer together with details of the journey, in the log book which should be kept in the vehicle. Failure to comply with this requirement may result in a tax charge for the employee concerned.

Any private use by an employee must be merely incidental to the business use.

The car must not normally be kept overnight at or near the residence of any employee.

It is imperative that all the above tests are met in order for a pool car to maintain its tax-free status.

9.7.2. Taxis

Receipts must be obtained for all taxi journeys claimed, details of the purpose for the journey and destination must be provided.

9.7.3. Parking

If parking costs need to be incurred for a business purpose, then the least cost option should be used and then claimed; employees are not permitted to claim for private parking.

Costs incurred through the use of parking meters must be recorded and attached to the relevant expense claim form. Details must include, date, details of where the car was parked and the name of the customer/ supplier visited.

9.7.4. Airport Parking

Car parking should where possible be pre booked as part of the travel booking procedure (*Travel Planning Procedure*). The company policy is to park in the most cost effective facility at airports unless in exceptional circumstances.

9.7.5. Tolls

Toll usage must be itemised, clearly showing business trip, client visited and receipts obtained for tax purposes.

9.7.6. Fines

It is the employee's responsibility to pay all parking and speeding fines - it is not a claimable business expense and will not be reimbursed in any circumstances. If the company receives a demand for an unpaid fine relating to a company vehicle, in the form of a reminder, the debt will be paid immediately by the company and the fine will be deducted from the offender's post tax salary. Any fine which is deducted from wages shall not constitute an unlawful deduction of wages.

9.7.7. Congestion charges

Congestion charges may be claimed if car travel in the designated area is unavoidable in the fulfilment of Company business, this should have prior approval from your line manager. Fines for non-payment of the congestion charge will not be reimbursed. Where fines are paid by the Company because you are a company car driver, the cost will be deducted from your post-tax pay. Any fine which is deducted from wages shall not constitute an unlawful deduction of wages.

9.7.8. Car Hire (Refer to *Travel Planning Procedure*)

Car hire should be pre booked as part of the travel booking procedure.

An employee must endeavour to refuel the hire car prior to returning it to the car hire company. Costs incurred for refuelling should be claimed via the expense form.

10. Accommodation

10.1. Overnight stays at hotels etc.

Overnight accommodation will be provided only when there is a requirement to stay away for business purposes. Overnight accommodation is managed centrally by the company travel bookers. This will often include subsistence (meals). In the event that this is not included the employee should pay before leaving and claim the relevant amount.

Employees are expected to exercise care and judgement when incurring expenditure on hotel bills. The company will not reimburse excessive costs relating to hotel accommodation and/or subsistence.

Claims in relation to viewing of in-house films will not be reimbursed. The company will not repay any tips/ gratuity.

Laundry charges will only be reimbursed in special circumstances i.e.:

- Where the trip lasts longer than was originally expected
- The trip is for longer than 7 consecutive days in duration

Expenses will only be reimbursed for costs incurred by the employee, not expenses incurred by their spouse or partners.

10.2. Meals

The Company will reimburse employees on business for the meals set out below. All expense claims must be supported by receipts and an adequate level of explanation. Reasonable levels of alcoholic beverages, for example a small glass of wine, consumed with an evening meal, may be included in the claim.

10.2.1. Breakfast (for irregular early starters)

The cost of breakfast will be reimbursed if:

- The cost of breakfast is not included in the rate charged for overnight accommodation, or
- The employee is required to travel before 6am on company business, which is not normal home to work travel.

10.2.2. Late Evening Meal Rate (irregular late finishers)

The cost of a late meal will be reimbursed if the employee meets all of the following criteria:

- Has to work later than usual
- Finishes work after 8pm and
- Has to buy a meal which they would usually have at home.

Employees are expected to exercise care and judgement when incurring expenditure on meals when working away from home.

The breakfast and late evening meal rates are for use in specific circumstances only and not intended for employees with regular early or late working patterns.

10.2.3. Where subsistence is for more than one employee or guest, the names of the other employees or guests present together with the names of their employer, must always be given for Revenue purposes. (Note: initials are not sufficient)

The most senior employee present for the meal must pay.

10.2.4. Lunch

Lunch away from the office is not claimable unless it is a working lunch with customer entertaining (names and name of employer to be stated on the claim). This is business entertaining and should be disclosed as such on the expense claim as per Section 11.1.

Snacks and beverages are not claimable unless they are customer entertaining (names and name of customer to be stated on the claim).

11. Entertainment

11.1. Business Entertaining

Business entertaining must be approved in advance by a Managing Director.

The most senior employee participating in the event must make the claim for the event.

If an employee's partner or spouse is present whilst entertaining they cannot normally be claimed for unless authorisation has been given by a Managing Director.

In all cases, the following must be provided to support the expense claim:

- Receipts
- The purpose of the event
- The names of the individuals involved
- The company to which they belong
- The names of the employees who attend the event

Where there are more employees present than customers or the employees present do not have a reasonable business reason for being present then the entertaining should be classed as staff entertainment.

11.2. Staff Entertainment

Where employees entertain other members of staff the cost must be shown separately from business entertaining and a full list of attendees, reason for entertaining and receipts must be provided. Prior approval must be obtained from a Managing Director before any staff entertaining is undertaken.

The Revenue deem the reimbursement of expenses associated with Social Events as a benefit in kind, unless the Social Event is an annual event and is open to every employee in the Company.

11.3. Other Occasions

Claims for functions are not allowable unless they are authorised in advance by a Managing Director.

12. Other Expenses

12.1. Professional Subscriptions

The company will reimburse one professional subscription annually for each employee where they believe membership of the body will enhance the employee's or company's effectiveness. An employee must be a full member of the relevant professional body and have provided HR with the following information:

- Details of professional body.
- Date of achievement and renewal date.
- Proof of membership e.g. membership number.
- Receipt of full payment (annually).

Payment will be reimbursed through the company expenses claims procedure as per 7 above.

12.2. Eye Tests

Payment of PRSI will entitle employees to free eye tests from the Government and up to €69 towards the cost of glasses. This should therefore not be claimed through company expenses.

12.3. Gifts & Hospitality

The receipt of gifts and hospitality must be in accordance with the company's anti-bribery policy.

The company does not provide gifts to staff with the general exception of trivial gifts of flowers on the birth/adoption of a new child and serious illness. Any other exceptions must be agreed, in advance, with a Managing Director.

The company will make a gift to the employee in the event of their wedding a One4All voucher to the value of:

0-5 years service €125

5-10 years service €175

10 years + service At the Directors discretion.

12.4. IT

All IT systems hardware and software, including peripherals and accessories must be ordered from GRAHAM Systems. Under no circumstances may employees purchase any of these items and claim through the expenses system. Stationery should be obtained from the office.

12.5. Materials

Site materials should be ordered via the procurement department and procedures.

12.6. Mobile Telephones

A company mobile may be provided for business use, refer to IT Acceptable Use policy for more information.

12.7. Company credit cards

The use of company credit cards should be for business expenditure only.

12.8. Petty Cash

Petty cash floats should be used for the purchase of trivial items only. Petty cash is not a substitute for the expenses or procurement systems. Petty cash should be claimed via the petty cash excel based form.

13. Allocation & Cost Centre Codes

The employee is responsible for coding their expenses correctly; lists of coding are available from the central expenses team.