



# Staff Expenses Policy

Titan Wealth Holdings Ltd and any related subsidiary or holding company ("the Company")

## Publication

This Policy forms part of the Company's Staff Handbook. This Policy forms part of the Company's Staff Handbook and is subject to the Company's governance and compliance framework.

It should be:

- Reviewed annually or upon significant operational or regulatory changes
- Accessible to all employees via the Company intranet or HR portal
- Communicated during onboarding and referenced in relevant training sessions

## Summary

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<b>Document Owner</b>	
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## Version Control

Ver	Date Drafted	Created by	Details of changes/updates	Approved	
				Name	Date
1	07.2022	Gretchen Roberts - HR Ayesha Malpas-Barb - Finance George Kakavelakis - Finance	Draft 1 Initial creation	Gretchen Roberts	
2	15.02.2023			Gretchen Roberts	
3	19.03.2024			Gretchen Roberts	
5	23.09.2025	Sara Al-Badri - IT Angeli Desai - Finance Marta Switalska - Finance Gretchen Roberts - HR	Full review and update of the entire document		

## Introduction

This Group policy outlines the rules and procedures for claiming and reimbursing business expenses incurred by employees. It ensures expenses are reasonable, necessary, and properly documented, and that company resources are used responsibly.

This policy applies to permanent and fixed-term employees of Titan Wealth Holdings Ltd ("Titan") and its subsidiaries. It does not apply to temporary staff, contractors, or consultants, who will be subject to separate expense arrangements.

The purpose of this policy is to provide clear guidance on the types of business expenses that may be claimed, the process for submitting claims, and the standards expected when incurring costs on behalf of the Company. It is designed to ensure that all expenses are reasonable, appropriately documented, and incurred in a manner that reflects Titan's values of integrity, accountability, and financial stewardship.

While this policy outlines typical scenarios, it may not cover every situation. If you incur an expense that you believe is wholly, exclusively, and necessarily for business purposes but is not explicitly addressed here, please consult your line manager. They will liaise with HR and Finance to determine the appropriate course of action.

Employees are expected to exercise sound judgment and treat company resources with the same care as they would their own. All expenses must be approved by your manager prior to being incurred.

Unapproved or non-compliant expenses may be rejected or treated as a taxable benefit.

This policy does not form part of any employee's contract of employment and may be amended at the Company's discretion. Finance will circulate monthly reports of expenses claimed or spent via corporate cards to Senior Management and HR for review and oversight.

Employees should also ensure they are familiar with Titan's Gifts and Hospitality Policy and comply with any additional requirements where relevant.

## Claims Process

We will reimburse expenses incurred correctly in accordance with these guidelines. Any attempt to claim expenses fraudulently or otherwise in breach of these guidelines will result in disciplinary action.

Expenses will only be reimbursed if they are:

- submitted via the expense management tool (e.g. Pleo) or to the Finance team on the correctly completed claim form, as applicable;
- submitted within 30 days of being incurred. Claims submitted after this deadline will be rejected unless exceptional circumstances are approved by Finance and authorised by your Manager.
- supported by relevant documents showing the items/services purchased (for example: VAT receipts, tickets, non-VAT receipts, digital receipts, Please note – we cannot accept bank statements screenshots, transaction slips (printed by the card terminal), documents that are blurry and/or hard to read,
- authorised by your Manager (Managers are requested not to approve expenses without receipts)
- Employees are expected to:
  - exercise good judgment concerning expenses; and spend the Company's money as carefully and judiciously as they would their own.
- Where possible, payment should be made by yourself and then claimed via the expenses reimbursement process.
  - Claims for authorised expenses submitted in accordance with these guidelines via the expense management tool will be paid directly into your bank/building society account in the next available reimbursements run. This is not guaranteed to fall in line with payday.
- Any questions about the reimbursement of expenses should be put firstly to your line manager or the Finance team before you incur the relevant costs.
- Any questions on how to use the expense management tool (e.g. Pleo) please email [pleoqueries@titanwh.com](mailto:pleoqueries@titanwh.com)
- Any questions on how to use the booking platform (e.g. Egencia) please email [egenciaqueries@titanwh.com](mailto:egenciaqueries@titanwh.com).

## Travel

### Applicability

This section applies to all local and overseas travel undertaken on company business. For the purposes of this policy, “company business” refers to activities, meetings, events, or assignments that are directly related to your role and undertaken at the request or with the approval of the company.

### Booking Requirements

Travel and accommodation for all employees and inbound to the UK must be booked via the designated booking platform (e.g. Egencia). If the platform is unavailable or does not offer the required option, please contact [egenciaqueries@titanwh.com](mailto:egenciaqueries@titanwh.com) for guidance. There should always be a business case for travel.

### Reimbursement Principles

Titan will reimburse the reasonable cost of necessary travel in connection with our business. “Reasonable” means the lowest logical fare/class available at the time of booking. The locations for travel to and from must be clearly stated on the claim. The most economical means of travel should be chosen if practicable, and you should use existing travelcards or season tickets wherever possible.

The following are not treated as travel in connection with our business:

- Travel between your home and usual place of work (commuting), even if you work late or outside of your normal working hours
- Travel which is mainly for your own purposes
- Travel which, while undertaken on our behalf, is similar or equivalent to travel between your home and your usual place of work

### Manager Approval

You must always seek prior approval from your manager to claim for travel between a company place of work and home. Expenses that are not approved by your manager will be treated as a benefit in kind (i.e., P11D for the UK), and you may be responsible for the tax value of the expense. Approval should be obtained in writing (e.g. email).

### Train Travel

We will reimburse the cost of standard class travel upon submission of a receipt with an expense claim form. Train bookings must be made as far in advance as possible (at least 1 month in advance).

### Taxi Use

Taxis (including ride-hailing services such as Uber or Bolt) should only be used when there is no suitable public transport, when heavy goods must be transported, for safety reasons (e.g. late-night travel), or when it is cost-effective due to significant time savings or multiple staff traveling together. When travelling to or from the airport, only standard taxis or ride-hailing services may be used. Executive chauffeur or luxury transfer services are not permitted and will not be reimbursed. A receipt must be obtained and submitted with the names of the passengers, where applicable.

### Personal Car Use

Where it is cost-effective for you to use your personal car for business travel, and you have been authorised to do so, you can claim mileage at the local tax authority's published rate.

## Parking and Non-Mileage Expenses

When using your personal car for authorised business travel as described in section 3.7, you may also claim any necessary parking costs, toll fees, and congestion charges incurred during the trip. All such expenses must be supported by a receipt or display ticket. Fines or penalties (e.g. parking tickets) are not reimbursable.

## Air Travel

If you are required to travel by plane in the course of your duties, you must discuss travel arrangements with your line manager in advance. International travel (long haul) should have a Titan Group CEO approval via a business case in advance of any booked travel.

Air travel costs vary depending on the season and timing; bookings should be made at least 1 month in advance for short haul and 3 months in advance for long haul.

For all business-related air travel, the following standards apply:

- Short-haul flights (flights with a duration of up to 6 hours) are to be booked in economy class.
- Long-haul flights (flights with a duration of more than 7 hours) are to be booked in premium economy class.

## Air Travel Category Guidelines

Staff Category	Flight Type	Permitted Class of Travel	Additional Notes
All Staff	Short-haul (<6 hrs)	Standard Economy	Booked 1 month in advance
All Staff	Long-haul (≥6 hrs)	Premium Economy	Must be signed off and booked at least 3 months in advance.

**Upgrades:** If you wish to upgrade your seat class on a flight, the company will reimburse only the cost of the permitted fare as outlined above. Any additional cost for upgrades must be paid by the employee.

## Receipts and Documentation

All expense claims must be supported by original or digital receipts.

If a receipt is lost, you must provide:

- A written explanation of the expense
- Proof of payment (such as a relevant bank or credit card statement), and
- Manager approval

The company reserves the right to reject claims that do not meet these requirements.

## Summary Table of Key Travel Expenses

Expense Type	Standard Policy	Exceptions/Notes	Documentation Required
Train	Standard class only	None	Receipt
Taxi	Only if no suitable public transport, safety, or group	Ride-hailing apps included; must be justified	Receipt, passenger names
Personal Car	Mileage at HMRC/local rate	None	Mileage log
Air Travel	Economy (short-haul), Premium Economy (long-haul)	Upgrades at employee's cost	Booking confirmation, receipt
Parking/Tolls	Business-related only	Fines/penalties not reimbursed	Receipt/ticket

### Accommodation and other overnight expenses

You should discuss accommodation arrangements with your line manager in advance. Accommodation is subject to an upper limit per night below. If nothing is available within these limits we would require demonstrable evidence of comparison hotels. Where possible, flights and hotels should be booked simultaneously as it's usually more cost-effective. Pricing limits:

Region/Location	Maximum Allowable (per night)	Notes
Central London	£250	Standard room, 3-4 star hotel
UK (excluding London)	£160	Standard room, 3-4 star hotel
Channel Islands	£190	Standard room, 3-4 star hotel
Europe	£150	Standard room, 3-4 star hotel
United States	£200	Standard room, 3-4 star hotel
Middle East	£200	Standard room, 3-4 star hotel
South Africa	Equivalent to £100	Standard room, 3-4 star hotel
Other Overseas	£150 (or local equivalent)	Standard room, 3-4 star hotel

#### Note:

- All claims must be supported by receipts
- Any exceptions to these limits require prior written approval from your manager
- Currency conversions should use the rate on the date of payment
- Personal Expenses i.e. minibar, movies, spa, gym, tips, newspapers are not reimbursable

### Claims Above the Upper Limit

If an accommodation claim exceeds the maximum allowable limit, the claimant must provide demonstrable evidence to justify the higher cost. Acceptable evidence may include, but is not limited to:

- A copy of the hotel's rate card or booking confirmation showing no standard rooms were available at or below the limit
- Documentation of a business requirement (e.g., proximity to a specific event or meeting location, safety concerns, or last-minute travel)
- Written approval from a manager obtained prior to booking
- If such evidence is not provided, the line manager has the discretion to approve reimbursement only up to the stated upper limit

### Out-of-Town Allowance for Personal Accommodation Arrangements

If you are travelling for work purposes and choose to stay with family or friends (not clients) instead of booking a hotel, you are entitled to an out-of-town allowance of £30 per day.

This allowance does not apply if you stay in a property owned by you or your spouse/partner.

### Meals and Subsistence Allowances

We will reimburse your reasonable out-of-pocket expenses for meals during business travel, provided they are supported by receipts, as follows:

- breakfast up to a maximum of £15 a day (where not included with accommodation)
- lunch up to a maximum of £15 a day; and
- Dinner (including beverages\*) up to a maximum of £30 a day

*\*Alcoholic beverages are not reimbursable.*

### Visa Requirements

If you require a visa for business travel, the company will reimburse the full cost of a standard visa application at the time of application. Visa applications should be made as far in advance as possible before any business travel.

### Government Guidance

Employees must follow all applicable government travel guidance for their destination (for UK employees, see UK government travel advice). Where additional costs are incurred due to government requirements (such as testing, quarantine, or insurance), these should be discussed with your line manager to determine whether the trip remains feasible and if such costs can be reimbursed.

## Entertaining clients

For the purposes of this policy, “entertainment” includes any hospitality or activity provided to actual or prospective clients, such as meals, drinks, business lunches or dinners, tickets to sporting events, concerts, cultural events, or other social activities. This also covers any form of hospitality or gift offered in a business context.

All client entertainment must be reasonable, pre-approved, and fully documented in line with company policy and compliance requirements.

- You may entertain actual or prospective clients only where an appropriate budget has been agreed in writing in advance with your line manager. This is in accordance with Titan’s Gifts and Entertainment Policy
- Entertainment including sporting events, concerts or cultural events must be pre-authorised by your manager and Compliance before accepting or attending.
- Any gift/entertainment regardless of the cost must be reportable using the Rule Guard platform.
- Any gift/entertainment over £100 requires pre-approval being sought from the individual’s manager and Compliance using the Compliance system (<https://gpp.cclcore.com/employee>).
- The full names of all attendees (including the company name if they are not an employee of Titan) must be included in the expense claim.
- You must also ensure that the provision of any such hospitality in the circumstances complies with our Anti Bribery and Corruption Policy. Where in doubt please refer to the policy documents or refer your query to compliance.
- A VAT receipt should be provided with the claim as supporting documentation at time of submission rather than a credit card receipt.

## Staff Entertainment

For the purposes of this policy, “staff entertainment” includes any team building activity, team lunch, or event attended by Titan employees.

### Policy:

- Any team building, team lunch, or event attended by Titan employees that exceeds £60 per person requires pre-approval from your Head of Department.
- All such events must be agreed in writing in advance with your line manager before any arrangements are made.
- The bill should be settled by the most senior employee present, who should then submit the expense claim.
- The full names of all attendees, including any external attendees and the company they work for must be included on the expense claim form.
- The expense claim must be supported by a VAT receipt. Failure to provide a VAT receipt may delay or disqualify your expense from being approved.
- Unless pre-agreed with Senior Management, the company will not reimburse costs associated with spouses or partners attending staff events.

## Training Expenses

### Pre-Approval Required

All training expenses must be approved in advance by both your line manager and HR. Further information can be found in the Training and Development Policy.

### Reimbursement

The company will reimburse the costs of any authorised training that is relevant to your job role, in accordance with company policy.

### Related Travel and Accommodation

Any travel and accommodation costs incurred in connection with approved training will be governed by the standard rules relating to business travel and accommodation set out in this policy.

Expense Type	Description	Reimbursement Policy
Travel	Transportation costs (e.g. train, standard class airfare, mileage) to and from the training location	Reimbursed in line with company travel policy and with receipts
Accommodation	Hotel costs for overnight stays if required for training	Reimbursed up to the standard accommodation limits and with receipts
Subsistence	Meals and refreshments during training days	Reimbursed up to daily meal limits and with receipts

Note: All training expenses require prior approval from your line manager, HR, and must be supported by original or digital receipts.

### Membership of professional bodies and associations

- HR must be notified of any membership requests.
- The Company will cover the costs associated with the membership of professional bodies where such membership is required by law or is in the interests of the Company.
- If the membership cost is >£1,500, this requires Senior Management approval.
- Further information can be found in the Training and Development policy

### Working late expenses

Employees may claim reasonable expenses when working unsociable hours, typically outside of standard business hours (e.g. after 8pm or during weekends), where:

- The extended hours are due to business-critical activity, such as a key project milestone, system go-live, or other exceptional operational needs.
- The nature of the work requires the employee to remain on-site or in close proximity to the workplace.

Eligible expenses may include:

- Evening meals or refreshments (Up to £20 for a meal when working during unsociable hours. This allowance is for meals consumed in or around the office and does not include meals purchased on the way home.)
- Travel home (e.g. taxi fare home if public transport is no longer in service)
- Accommodation (The cost of overnight accommodation if the employee is required to stay overnight due to working late)

VAT receipt must be provided when claiming these expenses. Claims without a valid VAT receipt may be delayed or rejected.

Note: "Unsociable hours" refers to work required outside of normal business hours, such as late evenings, nights, or weekends, as determined by your manager.

These expenses may be covered under a PAYE Settlement Agreement (PSA), meaning the company will settle any associated tax and National Insurance contributions directly with HMRC, so employees are not personally taxed.

All claims must be:

- Pre-approved by the relevant manager
- Supported by receipts
- Submitted within the expense policy timeframe

### Corporate credit card ('Card') Policy

#### **Eligibility & Approval**

New card applications will be assessed on a case-by-case basis and require line manager approval.

#### **Cardholder Responsibility**

The cardholder is responsible for ensuring accurate documentation and descriptions are provided for all transactions, even if the card was used by another team member.

#### **Permitted Use**

The Card must only be used for expenses that are wholly, exclusively, and necessarily for company business. If there is any uncertainty, the item should be paid for personally and reclaimed via the standard expense claim process.

#### **Expense Tracking Platforms**

Cardholders will be set up on either Pleo or Expensify, depending on the banking partner. These platforms allow users to:

- Track card usage
- Upload receipts and invoices
- Add descriptions and attendee details for events

#### Submission Deadlines

All receipts and full descriptions must be uploaded by the employee or a delegated individual in a timely manner by the end of each month to enable Finance to process expenses promptly.

#### Monthly Review Process

Line managers will receive their direct reports' spend summaries for review – either daily on Pleo or monthly from Finance (if Expensify)

#### Non-compliant Spend

If any expenditure is found to be outside of policy, the cost may be charged back to the employee.

#### Missing receipts

If 5 or more receipts are missing Finance have the right to freeze/ block the card until these are provided.

### Company donations

Donations may only be made by a Director. All donations must be referred to and approved by the Board prior to payment or commitment. If a donation is made using a Corporate Credit Card, it must be made in the name of the Company. Supporting documentation must include the charity number or donation reference, along with the receipt of payment. The Head of Compliance must be notified of any company donation. This confirmation should be submitted to Finance alongside the invoice for payment.

### Non-Employee expenses

- This section refers only to expenses incurred with individuals who are not classified as customers of the Company.
- If a cost is incurred on a Company Credit Card for a non-employee, the responsible employee must reimburse the Company\*

*\*Reimbursement must be made within one week of the Finance Team issuing the reimbursement request.*