

Our Standards of Behaviour

Business Partner Travel and Expenses Policy

CONFIDENTIAL – NOT TO BE REPRODUCED OR DISTRIBUTED FURTHER WITHOUT PERMISSION



LONDON GATWICK

POWERED BY VINCI AIRPORTS | GLOBAL INFRASTRUCTURE PARTNERS

Policy – at a glance

- ✓ Claims for Non-Reimbursable Expenses are prohibited (see 'Identify').
- ✓ All claims for expenses must be made in accordance with our detailed requirements (see 'Claim').
- ✓ When travelling, always seek to select the most environmentally friendly, and cheapest service and route possible, while balancing the need for your safety and wellbeing.
- ✓ Never engage in any behaviour which would contravene London Gatwick's policies and procedures or the law.
- ✓ As an approver of invoices at London Gatwick, only approve invoices which comply with this Policy.

Principles

We require our third party business partners to share our firm commitment to doing things the right way, by displaying the standards of behaviour set out in our Business Partner Commitment, the [VINCI Code of Ethics and Conduct](#), the [VINCI Anti-Corruption Code of Conduct](#) and the [VINCI Guide on Human Rights](#). The purpose of this Policy is to describe our conditions for the reimbursement of travel, entertainment and other expenses incurred by our business partners when doing business (for example supplying services) for or on behalf of London Gatwick. The requirements in this Policy are subject to any further restrictions specified in the contract between the business partner and London Gatwick (the 'Contract').

Identify

Under no circumstances will the following expenditure be reimbursed (the 'Non-Reimbursable Expenses'):



Expenditure you have not obtained our prior written approval to incur, expenditure which is non-essential for the services performed on behalf of London Gatwick, expenditure which does not have a clear and legitimate business-related purpose, or expenditure which is prohibited, meaning expenditure which:

- contravenes local law, your own company policies, or a recipient's company policies;
- is a facilitation payment or is incurred with the intent of improperly influencing a decision or to secure or retain business or a business advantage in favour of London Gatwick;
- involves offering entertainment or other benefits to a third party during a tender or negotiation process being conducted on behalf of London Gatwick.



Personal expenses or purchases, including (without limitation) for sightseeing, side trips, excursions or experiences, or expenses for friends, family, or personal companions.



Travel expenses for first class travel, upgrades, or preferred seat changes, five star or luxury hotels, alcoholic beverages, trip insurance, lost or damaged baggage, overweight baggage fees, luxury car services or limousines, business travel booked using frequent traveller miles, visa / passport fees, time in transit, valet parking, parking fines, or traffic violations, unless specified otherwise in the Contract.



'Per diem' expenses or expenses related to normal office expenditure (e.g., phones, mobile phones, Wi-Fi, printing, photocopies, postage), software, cables, adapters, supplies, gifts, or cash payments, unless specified otherwise in the Contract.



Expenditure which you have split to circumvent our individual transaction limit for documentary evidence.



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Act

As a business partner of London Gatwick, you:

- ✓ Never seek to claim for Non-Reimbursable Expenses (see 'Identify').
- ✓ Always ensure that claims are submitted in accordance with our detailed requirements (see 'Claim' below).
- ✓ Always seek to select the most environmentally friendly, cheapest service and route possible, while balancing the need for your safety and wellbeing while traveling. The decision to travel should always be carefully considered before making a booking, considering alternative means of communication such as video calls.
- ✓ Never engage in any behaviour which would contravene London Gatwick's Business Partner Commitment, and the [VINCI Code of Ethics and Conduct](#), the [VINCI Anti-Corruption Code of Conduct](#) and the [VINCI Guide on Human Rights](#)

Claim

- ✓ Invoices raised for expenses must:
 - comply with the terms of the Contract and this Policy;
 - be in the format and include the information required by the Contract;
 - be submitted in accordance with the process specified in the Contract;
 - be submitted within 60 days of the expenditure being incurred. Any expenses claimed which are over 60 days old will be refused.
- ✓ All claims made must be supported by:
 - a clear description of the legitimate business purpose and why it is essential to the services being performed for London Gatwick, for each expense being claimed;
 - a clear and itemised description of the goods or services purchased, the value of the expenditure, and the date the expenditure was incurred;
 - an invoice or receipt evidencing proof of purchase. For low value claims (under £25 or the equivalent market value in local currency) where a supporting receipt is not available, a bank statement or equivalent showing the expenditure incurred is sufficient.
- ✓ Expenditure incurred in foreign currency must be claimed at the rate used on the relevant card / bank statement or (where this is unavailable) the current rate quoted on www.xe.com.


Additional responsibilities for London Gatwick approvers

As a London Gatwick approver of invoices, you must review invoices to ensure that all claimed expenditure complies with this Policy.

How to raise concerns

Given our high profile as one of the largest and most popular London airports, London Gatwick needs to be especially wary of doing anything which could raise questions about our integrity or decisions. If you know or suspect that this Policy has

not been followed, it is very important that you immediately report the issue to the London Gatwick Legal & Compliance team. Contacting the Legal & Compliance team is easy:

	Email us at speak.up@gatwickairport.com
	Call the confidential speak up line on 0800 068 8907
	Make an online report (anonymously if preferred) at https://secure.ethicspoint.eu/domain/media/en/gui/106706/index.html .

London Gatwick does not tolerate any form of retaliation against anyone who raises a concern in good faith. Once a report has been made, please await further instructions on how to proceed.

Who does this Policy apply to and what are the consequences of breach?

This Policy applies to all business partners of London Gatwick and colleagues of London Gatwick who have responsibility for approving invoices. Breach of this Policy or local applicable law by business partners may result in termination of your contract with immediate effect. Breach of this Policy or local applicable law by colleagues of London Gatwick may result in disciplinary action, up to and including dismissal.

Governance

Policy name	Business Partner Travel and Expense Policy
Policy owner	General Counsel
Approved by	Executive Management Board
Key contact	Senior Compliance Counsel
Reference code	74 LEG 11
Version number	1.0
Effective date	31.07.24
Review date	31.07.26
Associated policies	Business Partner Commitment VINCI Code of Ethics and Conduct VINCI Anti-corruption Code of Conduct VINCI Guide on Human Rights
Data protection impact assessment	N/A
Compliance measures	Legal & Compliance and Internal Audit will conduct regular sampling to confirm that this procedure has been properly followed.