A. Purpose
To communicate the general principles, policies and procedures concerning most business related expenses incurred by Willis Associates.

B. Scope
Unless determined otherwise by contractual agreement, legal requirements or local regulatory requirements, this policy applies to all Willis Associates incurring expenses during the course of conducting Willis business globally.

This policy also applies to consultants, temporary personnel and other personnel who work for and travel on behalf of the Group. A summary version, that can be provided to Non-Willis Associates working on behalf of Willis, can be found on the “Spending and Expenses Policies” Homepage.

Further details for specific spend categories can be found on the “Spending and Expenses Policies” Homepage, accessible from the Willis Corporate tab on Good Morning Willis.

The Procurement Homepage will also help Associates to adopt the correct buying channel to procure goods and services.
0. General Expenses Management – POLICY ON A PAGE

THIS PAGE PROVIDES A SUMMARY OF THE POLICY CONTENT BUT IS NOT INTENDED AS A REPLACEMENT FOR THE FULL POLICY. PLEASE REFER TO THE DETAIL ON THE FOLLOWING PAGES FOR COMPREHENSIVE POLICY REQUIREMENTS.

1. GENERAL

1.1 All expenses must have a bona fide business reason for being incurred, and be submitted, approved and reimbursed in a manner consistent with the Expenses Management Policy (EMP).

1.2 All Associates are responsible for expenses management.

2. INCURRING EXPENSES

2.1. For a number of expense types (discretionary) this Policy sets out guidelines for what is deemed as ‘reasonable’. These expense types may be interpreted by business FDs to meet local needs. Other expenses types are considered mandatory and failure to observe these may result in escalation to senior management. It is the responsibility of all Associates to ensure annual expenses budgets are met.

2.2. Willis Associates filing an Expense Report more than twice per year must obtain a Corporate Credit Card. Where merchants allow, this card must be used to pay for all expenses.

2.3. Use of the Corporate Credit Card for personal charges is prohibited unless part of a bona fide Willis expense, even if there is no intention of submitting a corresponding expenses claim.

2.4. For Travel, Accommodation & Entertainment (TA&E) expenses with Government and Political entities please refer to Group Compliance Gifts, Entertainment and Hospitality Policy.

2.5. Cash advances are permitted in exceptional circumstances and for nominal values in foreign currency for incidental expenses. These must then be reimbursed by the Associate to the card provider and processed in a similar way to personal expenses.

2.6. Further guidelines on specific spend types can be found on the Spending and Expenses Policy home page – linked to from the Willis Corporate tab on GMW.

3. EXPENSES SUBMISSION AND APPROVAL

3.1. Where available, all expenses must be submitted using CONCUR – for other countries, local process for expenses reports should be followed.

3.2. Where CONCUR is available expenses should be submitted monthly. Where CONCUR is not available, a total claim < $100 may be postponed until the cumulative value exceeds $100; Please note corporate credit card late fees will normally be payable by the Associate.

3.3. Submission of expenses must be made with enough lead-time to ensure supplier & card statements are paid on-time to avoid penalty charges.

3.4. Accounts Payable hold a list of authorized expense approvers. Within CONCUR, normally the Line Manager will be the approver for expenses and out of policy air bookings.

4. REIMBURSEMENT

4.1. All expenses submitted for reimbursement must be fully itemized and classified.

4.2. Expenses submitted by the deadline shown in the policy will be paid either to the Associates Corporate Card (for Concur users) or reimbursed to Associates in time to pay their Corporate Card Statements, cash expenses will be reimbursed directly to the Associate.

5. OTHER

Further details on specific spend categories can be found on the Spending and Expenses Policies page, on the GMW>Willis Corporate page.
1. General Policy on Accountability

Overview

Expenses must be incurred, approved and reimbursed in a manner consistent with the policy outlined in this document and the Willis Anti-bribery and Corruption Policies, which can be found on the Group Compliance intranet site. All expenses must have a bona fide business reason for being incurred.

Expenses Reimbursement - General Rule

The Group will reimburse Willis Associates and pay suppliers in accordance with this policy when:

- Completed expense documentation has been reviewed and signed by the Willis Associate and appropriate authorized approver(s); - OR - Expenses claims have been submitted and approved on Concur (where implemented)
- Approved documentation has been received by the Accounts Payable Department: and
- Following a compliance review, the expenses are agreed to be reasonable in amount and necessary to accomplish a Willis business purpose.

Willis Associates at every level are responsible for expense management. Associates approving reimbursements have the same level of accountability to ensure that the Expense Management Policy is being followed, as the Associates who are expecting to be reimbursed.

Willis Associates violating this policy without a compelling business reason may be subject to disciplinary action and their expenses may be subject to non-reimbursement. Any misrepresentation of expenses will expect to be corrected and may result in further disciplinary action.

Exceptions - General Rule

While this policy represents consistent standards for all Willis Associates in most situations, circumstances not addressed in this document may arise. These should be managed in the spirit that expenses be appropriate, proportionate, legal, reasonable and avoid risk of any kind to the Willis brand.

Unless otherwise specified, exceptions to this policy must be approved by the Business Unit’s RFO/FD (or higher Manager).

Local Country Variations

Although this EMP applies to all Willis Associates and offices globally, due to currency variations between countries, there will be instances where an office or region may have a local policy that is more suitable.

In those cases, it is acceptable to use the local office policy, provided that by following it the Group will incur an equivalent value and standard as those quoted in the Spend Guidelines. For instance, a Willis region may have a lower maximum allowable amount per day for meals when conducting business within a specific country.
2. Incurring Expenses

A. Mandated Spends and Discretionary Spends

Certain expense categories and processes are mandated in order to:

- Provide evidence of control on legal or regulatory matters
- Minimise business risk, both operational and reputational
- Optimise operational effectiveness by being better joined up across Willis
- Leverage our supplier cost base to deliver on-going value

For mandated spends, specific reporting will be provided to CEOs and FDs to identify non-compliance. Depending upon severity / reoccurrence, Associates may face subsequent action.

It is the responsibility of Associates to ensure they are compliant in their planning and commitment of expenses on Willis behalf.

For non-mandated (or discretionary) spends, reporting will be provided to FDs to help manage to budgetary targets.

If in doubt, FDs/RFOs should be consulted.

The following spends are to be considered as mandated:
Spends that should be considered as mandates, to manage risk & spend:

<table>
<thead>
<tr>
<th>SPEND TYPE</th>
<th>MANDATED CHANNELS</th>
<th>RISK</th>
<th>COST LEVERAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. All spend with Govt. officials</td>
<td>&gt; pre-approval by Group Compliance</td>
<td>Regulatory / Legal</td>
<td>See Group</td>
</tr>
<tr>
<td>2. Gifts ($&gt;100 per person p.a.)</td>
<td>&gt; refer to Group Compliance</td>
<td>Regulatory / Legal</td>
<td>Compliance Policy</td>
</tr>
<tr>
<td>3. Entertainment ($&gt;250 per head)</td>
<td>&gt; refer to Group Compliance</td>
<td>Regulatory / Legal</td>
<td>for detail</td>
</tr>
<tr>
<td>4. Flights &amp; Accommodation</td>
<td>&gt; all spend via Travelport or Willis agencies</td>
<td>Staff safety</td>
<td>YES</td>
</tr>
<tr>
<td>5. Advertising/Sponsorship</td>
<td>&gt; all spend via Mktg Dept online request</td>
<td>Brand Control</td>
<td>YES</td>
</tr>
<tr>
<td>6. All Technology Spend</td>
<td>&gt; all spend via Group Procurement (I.T.)</td>
<td>Various</td>
<td>YES</td>
</tr>
<tr>
<td>7. Meetings / Conferences</td>
<td>&gt; $10k register on Events calendar</td>
<td>Brand Control</td>
<td>YES</td>
</tr>
<tr>
<td>8. All spend over $10k</td>
<td>&gt; engage Group Procurement</td>
<td>Commercial</td>
<td>YES</td>
</tr>
</tbody>
</table>

Denotes potential legal / regulatory impact for non-compliance – see Compliance Depts., Gifts, Entertainment & Hospitality Policy for detail

Notes (per item above):
1. Refer to Compliance Homepage for the definition of Government Entities & Officials

Spend not included in the Mandated Channels above, may be considered ‘Discretionary’.

- The spend policies (found on the Spending and Expenses Policies webpage) provide guidelines for what would be considered to be reasonable.

Although BU FDs will have the discretion to adapt spend levels to best meet the needs of their local business, it remains the responsibility of all Associates to optimise expenses to meet the approved budget.

B. Credit Card Use

General Rules of Corporate Credit Card Use

Willis Associates filing an Expense Report more than twice per year must obtain a corporate credit card. The application form is found on the Expenses Management / Accounts Payable homepage.

The corporate credit card must be used for all business-related travel expenses provided the merchant accepts Willis’ preferred card vendor.

It is imperative that Associates only use their corporate credit card in accordance with the Expense Management Policy, Gifts, Entertainment and Hospitality Policy and the Willis Anti-Bribery and Corruption Policies and Procedures.

Use of the Corporate Credit Card for personal charges is prohibited unless part of a bona fide Willis expense, even if there is no intention of submitting a corresponding expenses claim

Client Charges

Please refer to the Group Compliance homepage for guidance on client charges.

Payment of Credit Card Statements
It is the cardholder’s responsibility to ensure their credit card balance is paid in the time period required by the credit card company by submitting their report in Concur (Concur countries) or manually, in a timely manner each month. Any disputes must be resolved between the cardholder and the credit card company directly.

Late fees and interest charges on corporate cards are the responsibility of the cardholder and may not be reimbursed. For Concur countries, these must be tagged as “personal expense” in Concur.

**Lost Credit Cards**

Willis Associates must report a lost or stolen card immediately to the credit card company to prevent unauthorized charges.

**Termination of Employment**

Upon termination of employment, the corporate credit card must be returned to the Human Resources Department. Accounts Payable will cancel the account and the corresponding card should be destroyed.

Amounts outstanding on the card will be charged to the Associate’s BU. For those countries where Concur is implemented, Management must contact AP to assign a delegate to complete the final Concur report for payment.

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### 3. Approving Expenses - Authorized Signatories

Division RFOs/FDs have provided local Accounts Payable Departments with a list of authorized signatories. Any changes to the approval structure (signatories) must be sent to the AP department from the RFO/FD.

A list of approvers for any Division can be obtained from the local Accounts Payable contact. **If a non-approved signatory or an authorized signatory without sufficient approval level approves an expenses claim, the claim will be rejected and returned to the Associate for subsequent re-submission.**

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### 4. Disbursements – Documentation Requirements

**A. Associate reimbursement of expenses**

**Expenses Entry**

In all cases, non-Corporate Card expenses would be expected to be submitted within 30 days of being incurred. Such expenses submitted over 120 days after being incurred, may not be reimbursed.

**Countries where CONCUR (automated expenses management tool) has been implemented**

Expense reports and required documentation must be submitted using CONCUR. Paper/ manual expense reports will not be processed and will be returned to Associates for proper filing through CONCUR.

If a submitted report is not complete or accurate, or does not contain the appropriate documentation, the entire report will be sent back to the Claimant for correction and re approval.

**Countries where CONCUR has not been implemented**

Non-CONCUR countries may submit paper/manual expenses according to local guidelines.
If a submitted report is not complete or accurate, or does not contain the appropriate documentation, the relevant item(s) will be deducted from the Expense Report and reimbursed only on subsequent correct re-submission.

Note: A total claim of less than $100 may be postponed to a later submission when the cumulative value then exceeds $100; it should then be completed as an itemised, but single submission. Regardless of this, supplier and card statements must be paid on-time by the Associate to avoid penalty charges.

**Expense Submission Itemisation**

All expenses submitted for reimbursement must be fully itemized and classified, including:

- the business purpose of the expense
- the amount and description of each expense
- place and date of the expense
- the names and company affiliations of the persons involved where applicable
- room charges, meals and all other expenses on hotel bills.

**Receipts**

All Expense Report submissions must include original receipts. Absence of original receipts will be treated as an exception to the rule based on tax regulations, which require a Company to collect and retain original receipts for reimbursable business-related expenses.

Expense Receipts are always required, regardless of the amount, for the following expenses:

- **Mobile / Cell phone statements** - in countries subject to VAT or where cash payments are being reclaimed, the front page (invoice summary) is required. The claimants approver may request further detail if required.
- **Airfare** (itinerary from preferred Travel Agency required)
- **Hotels** (itemised invoice information must be captured for all travellers)
- **Car rentals** (car rental detail must be captured for all travellers)
- **Any receipt that includes VAT information**
- **Corporate Credit Card Statement for all travellers not using CONCUR**
- **Fuel purchases made by UK Associates where the intent is to submit mileage/fuel reimbursement. Willis is then able to reclaim associated VAT.**

Receipts under $25/ £25 are no longer required, except as noted above.

All receipts smaller than 8.5”x11” or A4 size, must be taped to 8.5”x11” or A4 paper. Multiple receipts may be attached to a single sheet of paper, but each receipt must be clearly visible.

For **US Associates** using CONCUR, if you pay for an expense using the corporate credit card and the expense is not airfare, hotel, car rental, telecommunications or contains VAT information as mentioned above, the electronic CONCUR transaction is sufficient proof of purchase. No other receipt is required.

For **UK Associates** using Concur receipts are required for all expenses other than flights (uploaded automatically) to allow VAT to be reclaimed by Willis.
Employees must continue to provide a description of the expense, business purpose, and attendees as required in CONCUR.

**Expenses Submission Dates**

As a general rule, credit card expenses that are submitted before the statement date (below) will not be reimbursed until the statement has been received.

- **US:**

  Credit card statements should be claimed according to the following timeline; the Corporate Card is paid for by US CONCUR:

<table>
<thead>
<tr>
<th>Date per month</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Statement received date</td>
<td>3rd – 5th</td>
</tr>
<tr>
<td>CLAIM DEADLINE</td>
<td>15th</td>
</tr>
<tr>
<td>PAY CARD DATE</td>
<td>25th</td>
</tr>
</tbody>
</table>

- **UK:**

  Statements are staggered through the month based upon Associates’ surnames. Each statement date will have a different claim and payment date as follows: the Corporate Card is paid for by CONCUR, based upon approved expenses, submitted in Concur Expense.

- **Rest of the World**
For countries that do not have CONCUR available, local policies on expenses submission will prevail. In each case, timing and the manner of submission will depend upon the local system deployed.

Cash expenses (non-Corporate Card expenses) may be submitted at any time.

**Approval**

When **Business Unit RFO/FD approval** is required, an e-mail documenting the approval must be part of the supporting documentation.

A Willis Associate may not approve an Expense Report that includes entertainment expenses in which he or she participated. The most senior member of staff present should pay and claim the expense with the next higher level of authorized signatory, not involved in the entertainment expense, approving the Expense Report.

**B. Payments where the Corporate Procurement Card is used with preferred suppliers**

The corporate procurement card (P-card) program is only available to US and UK based operations. The program is used to settle operating expenses with many of our preferred suppliers.

**US**

In the US, the monthly procurement cycle closes on or around the 16th of every month; all reports are processed via the CONCUR system.

Cardholders are responsible for ensuring the necessary approvals, all receipts and any additional documents are obtained and attached to reports prior to submission. P-card submissions must be made within the time limits set by Accounts Payable every month to ensure timely processing and payment of all P-cards. Accounts Payable will send an email advising of the relevant dates every month.

**UK**

In the UK, the monthly procurement card cycle runs from the 4th of the month until the 3rd of the following month.

Application forms can be found on the Expenses Management / Accounts Payable homepage, with the Corporate Credit Card application forms.

Under no circumstances should the P-Card be used for entertaining or travelling.

For approved users in the UK, The RBS online tool, SDOL (Smart Data on Line) can be used to:

- Review monthly charges
- Approve expense on line by cardholder & approver
- Allocate buyer card holders spend to correct codes
- Allocate train tickets to individuals using employee numbers

At the present time (Oct 2013) P-Cards are not processed via the Concur system as they are in US.

**C. Payments to Suppliers where an invoice is present**

All supplier invoices or cheque requests require appropriate approval as well as sufficient supporting documentation, including original invoices. When Business Unit RFO/FD approval is required, an e-mail documenting the approval must be part of the supporting documentation.
Supplier statements should never be submitted in lieu of an original invoice. Where applicable, an invoice cover sheet should be attached and include the account code to be charged, as well as the signature of the approver (either e-mailed or printed and signed).

Accounts Payable can only pay the current amount due on any invoice submitted even if the Business Unit approves the entire balance. If a previous balance exists (which has not already been paid), the claiming department should contact the supplier and request invoices supporting the outstanding balance be sent to that department for review and approval.

5. Other Expense Management Considerations

A. Value Added Tax (VAT) Expenses
In countries where VAT exists, travellers must make sure that the VAT amount and rate is on their original receipts submitted with their Expense Report.

B. Cash Advances (Advances for Travel) including Foreign Currency

All Associates travelling on Willis business would be expected to have a corporate credit card to pay for expenses.

Only Willis Associates who do not have a corporate credit card (or a personal credit card) are eligible for cash advances, although it is accepted that a nominal advance may be required for foreign travel (e.g. for taxis). Local countries will have their own methods of advancing cash to Associates.

In all circumstances, a guideline for the maximum advance allowed per day is $100/£40; the traveller must obtain pre-approval from their Business Unit's RFO/FD.

For Concur users, all currency procured by Associates on the Corporate Card must be treated as a personal expense, and they must reimburse the Card Company this amount directly. They should then claim the business expenses incurred using that procured currency as ‘cash items’ in Concur.

C. Foreign Currency Conversion

All $ (dollar) amounts in this policy are USD. Where necessary local ‘constant’ FX rates should be used to convert.

Every item on the Expense Report should be reported in the currency of the country that the expenses are being reimbursed in. Assuming the corporate credit card is used, all currency conversion will be done by the card vendor and/or in CONCUR (where used). If not, it is the traveller’s responsibility to convert from the currency used at the time of purchase to the reimbursement currency. The exchange rate for the conversion must be supported by an exchange receipt or the credit card statement. The rate of exchange should be indicated on the submitted Expense Report. The currency conversion calculation should be indicated on each receipt.

D. Limitations to the Expenses Management Process

The expense management claims process and corporate credit card must not be used for the acquisition of fixed assets or for any inter or intra-company spends.

6. Reimbursable Expenses / Spend Thresholds

Expenses that have been incurred in line with this Expenses Management policy will be reimbursed according to the procedures and processes outlined above.
The following tables provide an overview of the values (as at 1st October 2013). For a full list of mandated spends and discretionary spend guidelines, please refer to the “Spending and Expenses Management” page, found from the Willis Corporate tab on GMW. In the event of a conflict, the latter will provide the most up to date thresholds.

<table>
<thead>
<tr>
<th>Policy</th>
<th>2013 POLICY THRESHOLD / DIRECTION</th>
<th>Guideline or Mandate?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Global Policy Manual</td>
<td>All discretionary spend with Govt officials to be pre-approved with Group Compliance (e.g. Entertainment, Gifts, Meetings etc)</td>
<td>Mandate</td>
</tr>
<tr>
<td>Procurement</td>
<td>Over $10k including contract renewals, engage Gp Proc</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>Under $10k and considered a risk, engage Gp Proc</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>Under $10k and preferred supplier/mandated category, use supplier</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>Spends over $1k require 3 documented competitive bids, if from non-preferred suppliers</td>
<td>Mandate</td>
</tr>
<tr>
<td>GENERAL EXPENSES</td>
<td>No receipts required for amounts less than $25/£25</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>Approved expense reports to be submitted by the Claim Deadlines shown in the General Expenses Management Policy</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>Disciplinary action may be taken if submitted expenses greater than 120 days after end of month</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>All advertising must be submitted online and approved by Group Marketing</td>
<td>Mandate</td>
</tr>
<tr>
<td>Advertising</td>
<td>All sponsorship must be submitted online and approved by Group Marketing</td>
<td>Mandate</td>
</tr>
<tr>
<td>Travel - Airfare</td>
<td>All business related travel booked through preferred Willis Agencies or using WillTravel</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>Lowest available airfare</td>
<td>Guideline</td>
</tr>
<tr>
<td></td>
<td>May choose between preferred carriers if fare difference is not greater than $100/£75</td>
<td>Guideline</td>
</tr>
<tr>
<td></td>
<td>14 days advance booking should be applied</td>
<td>Guideline</td>
</tr>
<tr>
<td></td>
<td>Coach/economy must be used</td>
<td>Guideline</td>
</tr>
<tr>
<td></td>
<td>Premium economy allowed for journeys greater than 10 hours each way</td>
<td>Guideline</td>
</tr>
<tr>
<td>Travel - Car Rental</td>
<td>Must only be used if alternate forms of less expensive ground transportation not available</td>
<td>Guideline</td>
</tr>
<tr>
<td></td>
<td>Mid-size/group C only or smaller vehicle size permitted</td>
<td>Guideline</td>
</tr>
<tr>
<td></td>
<td>All business related travel booked through preferred Willis Agencies or using WillTravel</td>
<td>Mandate</td>
</tr>
<tr>
<td>Car Allowances</td>
<td>Mileage rates will adhere to the guidelines provided by local tax offices (e.g. HMRC in UK, IRS in US). The rates can be found on local country HR websites.</td>
<td>Mandate</td>
</tr>
<tr>
<td>Accommodation</td>
<td>All business related travel must be booked through preferred Willis Agencies or using WillTravel</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>Willis Associates should book using a preferred hotel at the Willis agreed standard rate</td>
<td>Guideline</td>
</tr>
<tr>
<td>Reimbursement in lieu of lodging</td>
<td>Maximum gift $75/£50 per night up to $200/£150 for entire stay</td>
<td>Guideline</td>
</tr>
<tr>
<td>Meals Only Personal Meals (per diem)</td>
<td>$50/£35 per event per attendee (including beverages)</td>
<td>Guideline</td>
</tr>
<tr>
<td></td>
<td>Maximum $75/£50 / day (allowance accumulation not allowed)</td>
<td>Guideline</td>
</tr>
<tr>
<td></td>
<td>Minibar expenses are included in this allowance</td>
<td>Guideline</td>
</tr>
<tr>
<td>Gratuities</td>
<td>Meals (UK &lt;=10%), (US &lt;=15%); Taxis (UK &lt;= 10%), (US &lt;=15%)</td>
<td>Guideline</td>
</tr>
<tr>
<td>Policy</td>
<td>2013 POLICY THRESHOLD / DIRECTION</td>
<td>Guideline or Mandate?</td>
</tr>
<tr>
<td>---------------------</td>
<td>----------------------------------------------------------------------------------------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>Entertainment</td>
<td>All Entertainment spend &gt; $250/£180 per person to be registered on Gifts Register</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>$140/£100 per event per attendee = reasonable guideline</td>
<td>Guideline</td>
</tr>
<tr>
<td>Meetings &amp; Events</td>
<td>Events &gt;$10k/£5k, to be registered on the Group Events calendar</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>Budget to be advised to GET, 60-90 days prior to event</td>
<td>Guideline</td>
</tr>
<tr>
<td>GIFTS</td>
<td>All gifts to be recorded in the Gifts Register</td>
<td>Mandate</td>
</tr>
<tr>
<td></td>
<td>Gifts to Associates: $50/£35 (including delivery charges and taxes)</td>
<td>Guideline</td>
</tr>
<tr>
<td></td>
<td>Must not exceed $100/person per year - Gifts Register to be updated</td>
<td>Mandate</td>
</tr>
<tr>
<td>Donations</td>
<td>All Donations require RFO/FD and Group Compliance pre-approval</td>
<td>Mandate</td>
</tr>
<tr>
<td>Systems</td>
<td>All IT spend must be raised through IT Procurement / IT PO System</td>
<td>Mandate</td>
</tr>
<tr>
<td>Mobile Phones</td>
<td>Currently under review</td>
<td>Mandate</td>
</tr>
<tr>
<td>(was Communications)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overtime/ Contractors/ Temp Staff</td>
<td>Awaiting HR Review and Update</td>
<td>Awaiting HR</td>
</tr>
<tr>
<td>Recruitment</td>
<td>Awaiting HR Review and Update</td>
<td>Awaiting HR</td>
</tr>
<tr>
<td>Training</td>
<td>Awaiting HR Review and Update</td>
<td>Awaiting HR</td>
</tr>
<tr>
<td>Expat</td>
<td>Awaiting HR Review and Update</td>
<td>Awaiting HR</td>
</tr>
</tbody>
</table>

### 7. Non-Reimbursable Expenses

In addition to those mentioned elsewhere in this document, the following items are non-reimbursable expenses.

- Airline club memberships
- Annual fees for personal credit cards
- Car washes for all vehicles (excluding Group-owned pool cars)
- Car rental refuelling at car rental agency & add’l insurance (except for when traveling outside the US).
- Credit card fees, interest charges or late payment fees
- Class-of-service upgrades on all travel services
- Commuting expenses
- Country Club Memberships
- Expenses paid on behalf of a client or an agent of the client, unless authorised
- Frequent traveller membership costs or charges
- Golf Club Memberships, Health club and sports facilities
- London Congestion Charges (for daily commutes)
- Newspapers and magazines
- Office equipment for use at home
- Over-the-counter medications
- Personal Smartphones and Tablets, excluding charges for approved business purposes
- Personal travel insurance in addition to Willis arranged coverage
• Political contributions
• Repairs, insurance, or maintenance of personal cars
• Repairs to personal apparel or effects
• Spa services (facials, massages, etc.) – except by pre-approval as part of an away-day
• Spouse expenses except for pre-approved instances
• Theft or loss of personal property, including personal car, clothing, or money
• Traffic/parking fines or court costs

8. Other Useful Links
The following are useful contacts and / or links that support this policy.

• The Spending and Expenses Policy hub
  o Why?: Location of all spend policies and guidelines
  o Contact: Group Procurement (Simon Myers)
  o Link: http://connect.willis.com/corp/williscorporate/BusinessServices/Lists/PolicyHub/AllItems.aspx

• Group Compliance Home page
  o Why?: Location of Anti-Bribery & Corruption Policies and Procedures
  o Contact: Group Compliance (London)
  o Link: http://connect.willis.com/corp/williscorporate/Compliance/SitePages/Home.aspx

• Accounts Payable
  o Why?: Payment of expenses
  o Contact: Via Expenses Management / Accounts Payable Homepage
  o Link: http://connect.willis.com/corp/williscorporate/expense/SitePages/Home.aspx

• Concur
  o Why?: Where implemented, is the expenses entry system
  o Contact: C/O Accounts Payable
  o Link: http://sso.willis.com/concur

• Travel Website
  o Why?: Home for all travel related queries and information
  o Contact: Group Procurement (Deborah Short)
  o Link: https://isuite2.hrgworldwide.com/willis/Home.aspx

• Policy Owners’ Expectations
  o Why?: Named policy owners will be expected to maintain their policy
  o Contact: Group Procurement (Simon Myers)
  o Link: By Email

• Procurement Homepage
  o Why?: More details on how to order specific Goods and Services
  o Contact: Group Procurement
  o Link: http://connect.willis.com/corp/williscorporate/Procurement/SitePages/Home.aspx

• Non Willis Associates Expenses Management Policy
  o Why?: Guideline for non-Willis Associates incurring expenses on behalf of the Willis Group
  o Contact: See The Spending and Expenses Policy hub above
• **Reporting**
  
  o **Why?** Monthly reporting on Expenses spend
  o **Contact:** Via local BU FDs
  o **Link:** Via local BU FDs