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# 1 Introduction

Employees and associates of Foradian are expected to travel both within India and overseas for business purpose. Employees and consultants need to know the travel procedure, eligibility for claims, advances for travel and settlement procedures for such business purpose travels undertaken. This document will guide and outline the policy and procedure relating to both domestic and international travels to meet this requirement.

# 1.1 Objective

The objective of this document is to list out guidelines for expenses incurred during short stay travel on domestic and foreign travel for business purposes.

The purpose of formulating this travel policy is to define and set guidelines that constitute the basis for travel allowance and expenses for employees and associates of Foradian, while on travel within India and outside India. This document defines the entitlements of the employee on travel as well as expense limits.

# 1.2 Scope

The company's Travel Policy applies to all employees who incur expenses while on travel and who receive reimbursement from the company for official expenses. The policy advisory establishes authorization procedures and guidelines for ensuring that travel and business expenses are valid, necessary and in compliance with company's accounting procedures.

#### Aspects covered by this document

- Domestic travel policy for short stay. This includes stay for training also
- Foreign Travel policy. It applies to short-stay travels, usually a month or less.
- Responsibilities and guidelines
- Accounting Procedure
- Local travel policy with long stay
- Foreign travel with long stay
- Aspects not covered by this document

-

- Aspects that are likely to be covered later
  - None

#### 1.3 Abbreviations

SI	Acronym	Expansion					
1	Admin	Administration					
2	CEO	Chief Executive Officer					
3	CFO	Chief Financial Officer					
4							
5							

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# 1.3.1 Definitions

Admin	The contact person from Admin who is responsible for interacting with the Traveler and executing the travel plans
Admin	The person who is in charge of the Admin function
Head	
Finance /	The person in Finance who approves the expenditure
Finance	
Head	
Long Stay	Continuous stay in a single place for a period of more than 30 days.
Short Stay	Continuous stay in a single place for a period of less than 30 days.
Travel	The external Travel Agent booking the travel
Agent	3
Travel	The person who approves the travel and the dates and times. Typically the manager
Approver	of the person(s) traveling
Traveler	The person(s) actually traveling
Traveler	The local contact of the Traveler(s) at the travel destination
contact	

# 1.4 References

Name of the document	Author	Document ID / Reference (Standard Books or methods)				

# 1.5 Control Mechanism

This policy shall be revised whenever changes are proposed to be incorporated, based on the Organization wide requirements and changes will be effected as per Documentation Control Process

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# 2 Domestic Travel

#### 2.1 Mode of Travel

#### 2.1.1 Air Travel

All travel to destinations more than 400 kms, for all employees and associates, regardless of length is economy class.

Employees are encouraged to use the most economical route. Bookings should be done directly from the company through authorized travel agents or through online bookings. In cases where the employee needs to book his/her own ticket, effort should be made to take the least cost route.

Air tickets and boarding passes must be retained and submitted with the expense report.

#### 2.1.2 Train / Road

All travel to destinations less than 400 kms should be completed by rail or by road. In the event the route is not convenient or if there are time pressures, the traveler may resort to Air Travel on specific approval from the CFO or CEO.

Permitted class of travel in case of road is deluxe class bus fare. In case of train, II Class A/c is permitted.

# 2.2 Stay

## 2.2.1 Hotel Stay

Hotel stay only, plus any taxes on stay, is reimbursed at actuals. Employees are encouraged to take the lowest rate room in the allowed hotel class. Hotels should be booked from the office and preapproved by the management before starting the travel.

No additional items on the hotel bills other than stay will be reimbursed. Items such as laundry, room service and pay-movies will not be reimbursed. Taxes on room tariff will be reimbursed as part of the room bill.

Reimbursement for Ironing of business suits will be permitted on need basis. Relevant bills need to be submitted along with the travel expense report.

## 2.2.2 Private Stay

In case the Employee chooses not to stay in a hotel, he may claim 40% of per diem additionally as a private stay allowance.

Private stay allowance can only be claimed on the days where a hotel stay would otherwise be required.

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Please ensure that private stay does not impose additional costs on the company, for example significantly increased travel costs. If such costs are incurred, they may be recovered from the employee at management discretion.

#### 2.3 Local Travel

Local Travel (travel within the destination city and the place of origination city) for official purposes is reimbursed at actuals.

If taking taxis, only ordinary taxis are permitted. Luxury or special taxis are not permitted. Hotel cars are not permitted, even for airport drops unless they are provided by Hotels free of charge. Wherever possible, receipts must be produced for Taxi travel. In case receipts are not available, please note down each trip by amount, date and start/end location.

In the event the Traveler has planned multiple meetings over a distributed area, he is permitted to use a car on rental for the day. In such cases the Traveler must request the Admin to book the vehicle at the preferred rates available for each city with the approved travel agent.

Travel purely for personal purposes, such as tourism or shopping, are not reimbursable.

# 2.4 Other Reimbursable Expenses

Expenses incurred in the course of business travel activity, other than those specifically covered in this policy, are reimbursed to the employee at actuals. All reimbursement claims must be accompanied by bills and charge slips.

The company will reimburse employees for approved and authorized expenses incurred while on business and/or related travel when the expense is:

- Actual and reasonable
- Necessary for business purposes
- Supported by a valid proof of expense such as cash or other original receipt unless otherwise provided in this policy.
- o In compliance with all the conditions established in this policy.

Reimbursements under this category are at the discretion of the management. Please seek specific approvals in cases where bills have been lost or expenditure is not incurred under a specified provision in the policy. No other direct expenses will be reimbursed without prior approval for domestic travel

## 2.5 Other Expenses

#### 2.5.1 Phone or fax

Official phone or fax calls are reimbursed at actuals against bills. People are encouraged not to use hotel phones except wherever necessary.

In the event the Traveler has the use of Roaming Facility approved by the company, on his cell phone, he/she will be reimbursed the cost of all official calls. However, it is advised that discretion be used in the usage of Cell phones for making long distance and local calls.

#### 2.5.2 Internet Access

If the employee has a laptop, he may use the local Internet account. At the discretion of the company, employee will be provided internet access enabled data card or will be reimbursed the cost of a local

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ISP connection in respect of phone usage charges and ISP account charges. Employee need to take advice from the Admin for efficient and least cost method for internet access while travelling.

#### 2.6 Business Meals

Business meals are meals that have a customer or business partner present in an official capacity. Friends in client / partner companies should not usually be treated at company expense. Meals including alcoholic drinks are reimbursed at actuals. Please restrict the meal to a reasonable amount for that place of visit; top-of-the-line dining or expensive liquor is not encouraged unless specific situations require it. Please pay for these by credit card wherever possible, and maintain both the bill and the charge slip. Please write on the back of the bill that who all the people were present (name and company) – bills without this will NOT be reimbursed.

Tips on business meals are reimbursed if paid for by credit card. Cash tips are reimbursed subject to management discretion. Please indicate the tip on the bill.

Meals without a customer or business partner present, even where business was discussed, are not business meals.

## 2.7 Per Diem

The purpose of a per-diem allowance is to make life simple and comfortable for employees traveling on business. Being structured as a flat allowance, it allows the employee to spend on daily personal expenses like food and drink.

Per Diem is expected to cover all laundry, food, drinks, water (in case you have to buy it) and sundry personal consumption. It is structured as an allowance, so no bills are required.

Per-diem is given at the rate of Rs. 750 per day. The rules for calculating per-diem are, 25% for every whole or part 6-hr period for which per-diem is applicable.

# 2.8 Advances

## 2.8.1 Advance Amounts

An employee is entitled to take advances from the company for the purpose of travel. If the employee has a usable credit card provided by company and valid for use in India, then he is entitled to an advance of INR 500 per night of stay, exclusive of travel time. In other cases, advance will be provided as per the travel estimate submitted and approved by Finance.

Employees who do not have credit cards, or have credit cards with insufficient limits, an advance of INR 3000 per night of stay are permitted.

# 2.8.2 Use of Advance Money

Advances are meant strictly for business use and per Diem.

## 2.8.3 Returning of Advances

All advances will be in Indian rupees. All unused advances must be returned in Indian Rupees immediately after completing the travel. Advances taken by employees must be settled within 7 days of the completion of travel by submission of Travel Expense report and Travel Activity Report. The format of the same is attached as annexure to this document.

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# **Foreign Travel**

Foradian is exploring the business opportunities across the globe and as a result, it is necessary to depute employees to various places outside India. This section defines the details of the Foreign Travel policy for business trips.

#### 3.1 Air Travel

3

Travel for all employees regardless of designation and length is excursion (restricted economy) class.

Employees are encouraged to use the least cost route, subject to reasonable convenience. Bookings should be done directly from the company through authorized travel agents or through online bookings. In cases where the employee needs to book his/her own ticket, effort should be made to take the least cost route.

Air tickets and boarding passes must be retained and submitted with the expense report.

# **3.2** Stay

# 3.2.1 Hotel Stay

Hotel stay only, plus any taxes on stay, is reimbursed at actuals. Employees are encouraged to take the lowest rate room in the allowed hotel class. Hotels should be booked from India and pre-approved by the management. Hotel bills must be paid for by credit card or travel card as applicable, and the charge slip produced. In case hotel bill is lost, only the charge slip is not sufficient, and the employee may have to wait for a duplicate to arrive before reimbursement.

No additional items on the hotel bills other than stay will be reimbursed. Items such as laundry, room service and pay-movies will NOT be reimbursed. Hotels will give you an iron and ironing board if requested. The employee is expected to do his/her own ironing.

For situations that require the use of business suits for over five days, one ironing of the suit at the hotel laundry service will be permitted. Note that the total length of stay is not the criterion, but the number of days the suit needs to be used.

Hotel tips are not reimbursed.

# 3.2.2 Private Stay

In case the Employee chooses not to stay in a hotel, he may claim 40% of the per-diem additionally as a private-stay allowance.

Private stay allowance can only be claimed on the days where a hotel stay would otherwise be required. This allowance cannot be claimed on travel stopovers, even if they involve extended periods.

Please ensure that private stay does not impose additional costs on the company, for example significantly increased travel costs. If such costs are incurred, they may be recovered from the employee at management discretion.

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#### 3.3 Local Travel

Local Travel (travel within the destination city) for official purposes is reimbursed at actuals. Employees are encouraged to use taxis as convenient. If there are (daily or weekly or other) passes available for public transport, then the employee is encouraged to use a pass wherever it makes sense, for both official and personal use.

If taking taxis, only ordinary taxis are permitted. Luxury or special taxis are not permitted. Hotel cars are not permitted, even for airport drops. Taxis in most countries provide receipts. Please ask for receipts wherever available, inclusive of tips if any. In case receipts are not available, please note down each trip by amount, date and start/end location.

Travel purely for personal purposes, such as tourism or shopping, is not reimbursable.

Taxi tips are reimbursable, but please tip only in countries that expect it.

# 3.4 Other Reimbursable Expenses

Expenses incurred in the course of business travel activity, other than those covered in this policy, are reimbursed to the employee at actuals. All reimbursement claims must be accompanied by bills and charge slips. Employees are encouraged to use credit cards wherever possible, so that records remain even if bills get lost.

The company will reimburse employees for approved and authorized expenses incurred while on business and/or related travel when the expense is:

- Actual and reasonable
- Necessary for business purposes
- Supported by a valid proof of expense such as cash or other original receipt unless otherwise provided in this policy.
- In compliance with all the conditions established in this policy.

All these reimbursements are at the discretion of the management. Please seek specific approvals in cases where bills have been lost or expenditure is not incurred under a specified provision in the policy.

# 3.5 Other expenses

#### 3.5.1 Phone or Fax

Official phone calls are reimbursed at actuals against bills. People are encouraged not to use hotel phones in most countries except where necessary, unless the hotel does not charge extra.. Please use a phone card wherever possible.

Prior approval is required to hire a mobile handset or to buy a pre-paid mobile phone card or phone cards. Purchase of handsets will not be reimbursed.

#### 3.5.2 Internet access

The Company will provide prepaid data card for internet access during travel. If traveler may also use the mobile phone for internet access, if the cost of such access is cheaper than the data card. Wherever possible, employee shall opt for wi-fi connectively available, if it's available free of cost (such

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as at customer location, hotel etc.,). The hotel phone lines may be used for this if it is toll free, or a phone card should be used.

#### 3.5.3 Car Rental

Hiring a car is allowed only in the USA, except if visiting New York. For Europe and other countries, specific approval is required. Please get prior approval for the class of car you are allowed to hire, and the optional items you are allowed to take. Cars should be booked from India as far as possible. *Car rentals must be paid for by credit card, and the chargeslip produced.* 

In all cases, please ensure that you are needed to travel enough to justify hiring a car and not use taxis/public transport.

The permitted class of car is an automatic transmission full-size 4 door with GPS. Liability Insurance and Loss Damage Waiver should be taken. All other optional insurance items will not be reimbursed.

In case a GPS is not required or not available, or if the period of rental is over a week, an automatic transmission intermediate 4-door car or sporty 2-door car should be rented.

#### 3.5.4 Other Direct Expenses

Any other direct expenses necessary for business at actuals without prior approval may be reimbursed at discretion of the management. The employee is allowed to spend without prior approval under this head up to US\$50 *per trip,* though such expenditure has to be justified to management on return. Amounts in excess of that need prior approval. Supporting bills are required in all cases.

All claims under this head, regardless of amount may not be reimbursed (or reimbursed only in part) at management discretion if not satisfied.

#### 3.6 Business Meals

Business meals are meals that have a customer or business partner present in an official capacity. Friends in client/partner companies should not usually be treated at company expense. Meals including alcoholic drinks are reimbursed at actuals. Please restrict the meal to a reasonable amount for that country; top-of-the-line dining or expensive liquor is not encouraged unless specific situations require it. Please pay for these by credit card wherever possible, and maintain both the bill and the chargeslip. Please write on the back of the bill who all the people were present (name and company) – bills without this will NOT be reimbursed.

Tips on business meals are reimbursed if paid for by credit card. Cash tips are reimbursed subject to management discretion. Please indicate the tip on the bill.

Meals without a customer or business partner present, even where business was discussed, are not business meals.

#### 3.7 Medical Insurance

The company will pay for comprehensive medical insurance of the employee for the period of travel. This has to be issued in India.

Any expense not covered by the issued insurance, such as contact lenses or eyeglasses, will not be reimbursed.

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# 3.8 Spouse Travel

There is no provision for spouse travel on short visits. Even if the policy guidelines are applied to longer visits, spouse travel is not provided for

#### 3.9 Per Diem

The purpose of a per-diem allowance is to make life simple and comfortable for employees traveling abroad on business. Being structured as a flat allowance, it allows the employee to spend abroad on daily personal expenses like food and drink that he would find unaffordable in his rupee salary.

Per Diem is expected to cover all laundry, food, personal travel, drinks, water (in case you have to buy it) and sundry personal consumption. It is structured as an allowance, so no bills are required.

#### 3.9.1 Abroad

Per Diem allowances have been calculated countrywide depending on the cost of living of the country. The idea is to provide a comfortable, hassle-free living; not a dollar compensation. The allowances are on the generous side, and have been calculated with the idea that an employee can have roughly \$20 per day in pocket money after paying for a reasonable level of food personal travel.

- Per-diem is applicable only for employees staying a continuous period of a month or less abroad.
   For longer periods, other allowances will be applicable, which will be indicated to the employee specifically. This will be based on location of stay, duration of stay and cost of living in such places.
- 2. All per-diems are paid in US dollars. Amounts are rounded off to the nearest dollar.
- 3. No bills need to be produced for claiming per-diem.
- 4. The applicable period for claiming per-diem starts on the scheduled arrival time of the plane in the destination country or stopover country outside India (as on the ticket) and stops at the boarding time of your outgoing flight as given on your boarding pass. Time spent in flight is NOT covered under per-diem, but any stopovers are covered). All days are calculated midnight-to-midnight local time that is, the midnight of the country you are in at that moment
- 5. You are entitled to 25% of the per-diem of the country you are in for every full or part 6hr interval you spend in the applicable period. If you are in more than one country in a single day, per-diem is taken as if you spent the entire day in the country with the higher per-diem.
  - a Example: If you are in Japan till noon (12 hrs from midnight, country per-diem US\$70) and in Los Angeles, USA from 10pm onwards (2 hrs to midnight, country per-diem US\$50) then you are eligible for 14hrs (three 6hr or part periods) at the higher per-diem = 75% of US\$70= US\$53. (note that the midnights are different, but the calculation is simple).
- 6. For stopovers, per-diem may be claimed as stopover allowance. This is applicable only to enforced stopovers outside India the employee must take the first convenient flight out of the stopover location.
  - a. Stopover times are added to the applicable period for per-diem calculations. The stopover time is calculated as the difference in times between the scheduled arrival of the plane and the scheduled boarding time (as printed on the boarding pass). Boarding times are usually 30 min before the departure time, but that is the time taken, not the departure time (the idea being that you have nothing to spend on when sitting and waiting for boarding). Please preserve your boarding passes.

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- b. No stopover allowance is given for locations in India.
- c. No stopover allowance is given for stopovers that result from missed flights, unless the connecting flight was missed for no fault of the employee (such as delayed incoming flight). The entire stopover period will be ineligible for per-diem, not just the extra period above the scheduled stopover. This is to prevent misuse, since the boarding card is not available for the original flight.
- d. If departures are delayed, no extra per diem is applicable unless proof of delay is available. Proof of delay would normally be available in the boarding pass, which gives the time of boarding. If proof of delay is not available, allowances may be given in whole or part only at management discretion.
- e. If the employee chooses voluntarily to stop over somewhere, or wishes to extend his stopover for some personal reason then the stopover allowance is not applicable at all for the entire stopover.

#### 7. Extension of stay:

- a An employee may not extend his stay in a foreign location without specific management approval. He is expected to take the first convenient flight back that business needs allow for. No per-diem or allowances will be given for any of the days of extension of stay, or for any stopovers incurred in that period.
- b If his extended stay is at the start of the business visit, no stopovers in the outward journey will be considered for per-diem. Per-diem will start from midnight of the first day of business activity.
- c If his extended stay is at the end of the business visit, no stopovers in the return journey will be considered for per-diem. Per-diem will end from midnight of the last day of business activity.

#### 3.9.2 Within India

Domestic portions of foreign trips, such as trips abroad via Mumbai or Chennai, are not eligible for India per-diem for the domestic portion unless a night's stay is required in that location.

In such cases, Per-diem within India is given at the rate of Rs. 750 per day. The rules for calculating per-diem are the same as when abroad – that is, 25% for every whole or part 6hr period for which per-diem is applicable.

# 3.10 Special One-time Reimbursements

This head lists certain special claims that the employee is entitled to when traveling for the first time. All allowances are for the amount specified or the actual amount spent whichever is lower.

Any special allowance(s), except home return allowance, will be taken back if the employee leaves the company within a year of claiming the allowance(s).

#### 3.10.1 Suit Allowance

An employee may claim a maximum Rs 10,000 as suit allowance against bills for the purchase or tailoring of a business suit. This allowance is only applicable to employees for whom suits are necessary.

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This claim can be made only once, and only just prior to a *confirmed* business trip abroad that requires the use of a suit.

# 3.10.2 Winter clothing allowance

A one-time winter clothing allowance of up to a maximum US\$300 may be claimed towards the purchase of winter clothing only for trips where an employee will face sustained temperatures of around 0°C. Items included are overcoats, jackets, gloves, etc.

Winter clothing should be purchased abroad only and preferably on credit card. Indian winter clothing is not adequate, and that is the reason why such a provision is made. Reimbursement will be made in India; either to credit card or when the employee returns.

The amount is generous enough for good quality clothing even for bitter winters. Lighter jackets for indoors can be purchased in India at the employees' own expense.

Employees are encouraged to buy adequately warm clothing even for very low temperatures, without worrying if the same can be used in India or not. The employee will NOT be given the allowance again if he has to visit a country that has much lower temperatures than when he originally bought the clothing. For example, if an employee is going to New York in November (0 to -5°C), and buys clothing warm enough for that, then is asked to go back in early Feb to Sweden (-20°C) he will not be given the allowance again for warmer clothing.

Please also purchase clothing appropriate to your attire. If you are required to wear suits, you need formal gloves and overcoats. If casual-wear is the norm, then jackets and ski gloves will be more comfortable.

The allowance is only given once. Replacement of such clothing for any reason will not be reimbursed.

## 3.10.3 Excess Baggage Allowance

Excess baggage allowance will be reimbursed at actuals only if it involves carrying business specific baggage, and only on prior approval.

Excess baggage of up to 15kg will be allowed on the outward journey for carrying Indian products to other Foradian team members abroad, subject to import regulations. Duty if applicable on those products will NOT be paid.

No excess baggage for Indian products for the team will be reimbursed on trips to USA, because the baggage allowance there is substantial. No excess baggage will be allowed for domestic flights.

# 3.10.4 Home Return Allowance

An employee is entitled to return to Bangalore for a week after every three months of continuous stay abroad, if he is expected to stay at least another continuous month more abroad after return. The exact return date and period of stay may be adjusted for the company's convenience. He will be required to report for work on the weekdays during his stay in Bangalore.

The return trip is applicable only for return to Bangalore. No per-diem or foreign allowances will be given during his stay in India.

This allowance is applicable only if the employee is on posting abroad and not posted fulltime with a foreign currency salary. The allowance is not applicable if he/she takes his family with him/her. The allowance is also not applicable if the employee takes leave for any period during the two months.

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Alternate compensation equivalent to the return airfare may be offered in Indian rupees subject to taxes at company discretion if project schedules prevent the company from bringing the employee back to Bangalore within reasonable time.

#### 3.11 Advances

#### 3.11.1 Advance Amounts

An employee traveling abroad is entitled to take advances from the company. If the employee has a usable credit card valid for use abroad, then he is entitled to an advance of US\$100 per night of stay, exclusive of nights spent in the air or at stopovers.

Employees who do not have credit cards, or have credit cards with insufficient limits, an advance of US\$200 per night of stay is permitted.

The preferred mode of advance will be the VTM card. The Traveler will get a VTM card with \$500 or the advance amount entitled, whichever is less, loaded onto the card initially. The card will be recharged up to the max of the allowed advance periodically as balances run low.

# 3.11.2 Use of Advanced money

Advances are meant *strictly* for business use and per-diems. The Traveler should independently take forex on basic travel quota for other personal use.

#### 3.11.3 Returning the Advance

All advances will be in US dollars. All unused advances must be returned in US dollars. The employee *cannot* return to the company the rupee or any other currency equivalent of the same. Unused currency of other countries must be converted into US Dollars *before* returning to India, because it is not possible to get US dollars once the employee has reached India.

In case the Traveler cannot return the unused portions of the advance in US dollars, the Traveler will return the rupee equivalent at the exchange rate decided by Finance, which may be different from the prevailing exchange rate, or any particular past rate.

Advances taken by employees in forex must be settled within 7 days of the completion of travel.

# 4 Expense Reports & Activity Reports

# 4.1 Expense Reports

Expense reports should be submitted in the approved format to Finance within 7 days of end of journey

In case the employee / associate delays in submitting the report, certain expenses, especially those without supporting documents, may be disallowed. In case the expense is not submitted with in a month from the end of the journey, then the advance amount paid will be deducted from other claims including salary pending towards employee / associate.

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# 4.2 Travel Activity Report

Each travel, either by Engineering team or for business development, is approved for a specific purpose. It is necessary for the Company to evaluate the results achieved in each travel undertaken vis-à-vis the purpose of the travel. It is also necessary to document the activities carried out during each such travel to take appropriate course of action by the Company.

To achieve this objective, Travel Activity Report shall be submitted by the Traveler to Finance along with travel expenses report. Finance will be custodian of these reports. These reports are available on need basis to the persons who are in need for official purposes.

The Travel Activity should be submitted in the specified format to Finance within 7 days of end of journey. The report is a pre-requisite to pay any arrears of payment to the Traveler, including such person's credit card dues. Any charges levied by the Credit Card issuing Bank due to non-payment, which has resulted in non-submission of travel activity report on time will not be reimbursed by the Company.

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# Annexure I: Travel Expense Report Form

		Foradia	n Tech	nologie	s (P) Li	td			
		Reimbu	rseme	ent of E	Expens	se			foradian
Purpos Statement	e:#:							Pa From: To:	
Nam Employee II	ne: D:			epartment: Manager:					<u>.</u>
Date	Description	Air & Trans.	Lodging	Fuel / Mileage	Phone	Meals & Tips	Internet	Other	Total
									- -
									-
									-
									-
									-
									-
									- -
									-
		0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
		0.00	0.00	0.00	0.00	0.00	0.00	Subtotal	
								Advances	
A							То	tal Reimbursement	
Amount in words	:	Recomme	nded By:		Verification	on by Busir	ess Financ		rget to attach receipts * Approved By:
Signature of	the Employee	Name Signature			Name Signature				Name Signature
Signature of the Employee		Data			Data				Data