



Corporate Policies & Procedures

Prevention of Improper Payments

Policy Number:	A153	Prepared by:	Eric B. Miller
Approval Date:	April 1, 1997	Approved by:	Charles W. Fischer
Last Revised:	November 21, 2008		President & Chief Executive Officer

POLICY

The Company shall conduct its business in an honest and ethical manner reflecting the highest standards of integrity and in compliance with the relevant laws and regulations applicable to it.

A. Definitions

Company means Nexen Inc. and its majority owned subsidiaries.

Employee means a regular, temporary or contract employee of the Company.

High Risk Country means a country that the Compliance Committee determines is at high risk with regards to Improper Payments based upon such criteria as the annual Transparency International Country Perceptions Index.

Public Official means any officer or employee of a government or any of its agencies or a government owned or controlled corporation, any officer or employee of a public international organization, any official or candidate of a political party, or any person acting in an official capacity for any such entity.

B. Compliance Committee

The Compliance Committee is responsible for administering this Policy and shall meet on a regular basis to do so. The Compliance Committee shall be chaired by the Chief Legal Officer and shall consist of the Chief Financial Officer, the Vice President, Human Resources, the Director, Corporate Audit and the appropriate Executive Vice President of the department responsible for the issue being considered under this Policy.

C. Improper Payments

The following payments are improper and must not be made.

1. Bribe

A Bribe is where one party gives or offers another party, either directly or through an intermediary, any money, advantage or benefit of any kind, in order to influence the making or not making or implementation of a decision or act by that party.

The Company, its Employees or its Agents (as defined in Section I (1) below) shall not:

- a) Directly or indirectly, offer or give a Bribe and any demands for such a Bribe shall be rejected; or
- b) Pay or offer anything of value to a Public Official or to a dependant of a Public Official in order to influence corruptly any act within the recipient's official capacity, or to induce the recipient to violate his/her lawful duty, or to induce the recipient to use his/her influence with a government to effect or influence any act or decision of such government for the purpose of obtaining, retaining or directing business or to secure an improper advantage.

2. Kickback

A Kickback is the payment or receipt of a portion of a contract payment. This includes a gift of significant value received from or given to a Contractor.

The Company, its Employees or its Agents shall not kickback any portion of a contract payment to employees of another contracting party or utilize other techniques, such as subcontracts, purchase orders or consulting agreements, to channel payments to Public Officials, to employees of another contracting party, their relatives or business associates.

3. Extortion

Extortion is an act to obtain something of value by force, threats or intimidation.

The Company, its Employees or its Agents shall not, directly or indirectly, participate in extortion from any party dealing with the Company.

D. Facilitation Payments

1. Definition

A Facilitation Payment is an occasional small payment made solely to expedite or secure the performance of the following routine government actions:

- i) Obtaining licenses, permits and other official documents to qualify to do business in a country;
- ii) Processing governmental papers, such as visas and work orders;

- iii) Providing routine security protection, mail services and inspection of goods or of contract performance;
- iv) Providing telephone service, utilities, loading or unloading cargo and protecting perishable goods from deteriorating; or
- v) Actions of a similar nature.

2. Criteria

The Company discourages the use of Facilitation Payments. However, occasional Facilitation Payments may be made in the following circumstances:

- i) The payment falls strictly within the definition of a Facilitation Payment;
- ii) When both the payment and its amount are absolutely necessary to conduct the Company's business; and
- iii) The payment must be properly recorded in reasonable detail that accurately and fairly reflects the transaction and includes such information as the amount paid and the purpose of and authorization for such payment.

3. Compliance Committee Approval

Each country or department manager of the Company can approve Facilitation Payments up to a maximum amount of US\$ 100 per Public Official for a single transaction within the boundaries of the country or department under their responsibility. Where a request for a Facilitation Payment from a Public Official is greater than the above maximum amount, the responsible manager shall request the written approval of the Compliance Committee using the attached form prior to making any such payment.

4. Emergency Situation

In exceptional, emergency situations involving imminent threats to the personal health and safety of Employees, their families or dependents, Employees can make necessary Facilitation Payments over US\$ 100 without prior approval. After such an occurrence, the responsible Employee shall promptly report such payment to the Compliance Committee on the attached form and such payment shall be properly recorded as soon as possible.

E. Gifts and Entertainment for Public Officials

1. Criteria

The Company's Employees or Agents can provide nominal gifts or reasonable entertainment and meals to Public Officials if they are:

- i) For a bona fide and legitimate business purpose;
- ii) Reasonable and appropriate under the circumstances;

- iii) Incurred in good faith; and
- iv) Consistent with the law or regulations of the Public Official's country.

2. Compliance Committee Approval

Each country or department manager of the Company can approve expenditures on gifts up to a maximum amount of US\$ 100 per Public Official for a single transaction within the boundaries of the country or department under their responsibility. Each country or department manager of the Company can approve expenditures on entertainment and meals up to a maximum amount determined by an approved index that states reasonable amounts for meals or entertainment in the country where the meal or entertainment expense is incurred. Where such expenditure is expected to be greater than the above maximum amount, the responsible manager shall request the written approval of the Compliance Committee using the attached form prior to making such expenditure. All such expenditures must comply with the requirements of local law on gifts, meals and entertainment for Public Officials in that country.

3. Recurring Expenses

When requested, the Compliance Committee can approve routine and recurring entertainment expenses for Public Officials that in the aggregate exceed such maximum amounts for a set period of time based upon defined, legally permissible criteria.

F. Travel for Public Officials

1. Criteria

The Company can pay or reimburse the travel costs of Public Officials if they are:

- i) For a bona fide and legitimate business purpose;
- ii) Reasonable and appropriate under the circumstances;
- iii) Incurred in good faith;
- iv) Consistent with the law or regulations of the Public Official's country;
- v) Directly related to the execution or performance of a Company contract;
and
- vi) Requested in writing by the Public Official's government.

Travel costs of Public Officials paid by the Company should mirror Company travel practices for the equivalent position of an Employee or Canadian government protocol standards with regards to class of hotel and plane ticket.

2. In Country Travel

A country manager of the Company can approve the payment of in country travel costs of Public Officials.

The Company shall pay such expenditures directly to the vendors for the direct travel between point of origin and the company's facilities and for the actual, reasonable meal and accommodation costs at the site visited. Where that is not possible for individual travel items, the country manager can approve the reimbursement of such reasonable travel costs up to a maximum amount of US\$ 100 per Public Official per round trip. Where such expenditure is greater than the above maximum amount, the country manager shall request the written approval of the Compliance Committee using the attached form prior to making such expenditure.

The Company shall not pay Public Officials a travel per diem for in country travel. The Company shall not pay travel costs for spouses or dependants of Public Officials for in country travel. If a government job position has been pre-approved for in country travel by both the Ministry that is authorized to request such travel and the Compliance Committee, then a specific written request naming the Public Official is not necessary.

3. Out of Country Travel

The Company shall only pay or reimburse the out of country travel costs of Public Officials if:

- i) It is in accordance with local law requirements;
- ii) It is based upon reasonable and verifiable per diems as described below; or
- iii) It is based upon the reimbursement of reasonable costs as described below and confirmed by original receipts submitted by the Public Official.

Written requests from a government for out of country travel must name the individual Public Official traveling. Payments for out of country travel costs, such as plane tickets and hotel rooms, shall be paid directly to vendors and not to the Public Official.

Under Section F(3)(i) above, the Compliance Committee can provide annual blanket approvals for out of country travel. All individual approvals done locally under the Compliance Committee's blanket approval must be done using the attached form. All out of country travel approvals under Section F(3)(i) above shall meet the requirements specified under local law.

Under Sections F(3)(ii) and(iii) above, the Compliance Committee's approval must be acquired in writing prior to extending an invitation to the Public Official and prior to the commencement of any such travel. All requests for the payment of out of country travel costs of Public Officials under these Sections must be made to the Compliance Committee on the attached form.

Under Section F(3)(ii) above, the Company can pay travel per diems to Public Officials for their out of pocket costs, such as meals, telephone & fax charges and local travel costs, incurred while traveling. The Company shall set such travel per diem rates for the reasonable cost of such items at the site visited based upon current, independent third party travel surveys. Any such out of pocket costs paid directly to travel vendors (e.g., hotels or restaurants) by the Company shall be deducted from daily travel per diem

amounts. There shall be no travel per diem paid for travel days except for a stopover as described below.

Under Section F(3)(iii) above, the Company shall reimburse any reasonable costs incurred by a Public Official based upon current, independent third party travel surveys.

Where direct flight time from point of origin to final destination is ten hours or more and the Public Official requests a stopover, the Company can pay for a one night stopover for each of the originating and return journeys, with a maximum of two stopover payments per trip. The Company should pay such reasonable stopover costs directly to the vendors. Where direct payment is not possible, the Company shall provide a one day travel per diem (based upon the current, independently verified accommodation costs at the stopover site) to the Public Official for each approved stopover. The Company shall not pay the Public Official any such travel per diem if there is no overnight stopover.

Where out of country travel coincides with the provision of government services or the requirement of a meeting fee as approved in Section G below, the Company shall not also pay travel per diems for days on which a Public Official receives compensation for government services or a meeting fee except for limited incidental expenses as provided in the company's travel policy. The Company may pay for travel costs, such as airfare, hotel rooms, and meals, directly to vendors where possible, as discussed above.

As a general rule, the Company shall not pay travel costs for spouses or dependants of Public Officials for out of country travel. However, the Company may pay the reasonable out of country travel costs for a spouse of a Public Official where diplomatic protocol requires the spouse's attendance at public events held at the travel site and where both the Compliance Committee and the President of the Company have approved such travel prior to extending an invitation and the commencement of any such travel. The Company shall not pay travel per diems for such spouse.

G. Government Services and Meeting Fees

If a government that the Company does business with requests that its Public Officials be compensated for serving on committees, attending committee meetings, or for providing advice or services addressing issues that impact the Company's investments, then such request shall be referred to the Compliance Committee for approval prior to agreeing to any such arrangement. The compensation can include reasonable time based fees and benefits as required under local law. Such request for approval shall be accompanied with the following information:

- i) The name and title of the Public Official(s);
- ii) A description of the service being provided by the Public Official(s);
- iii) The amount of compensation for each Public Official(s);
- iv) A copy of the local law under which such compensation is required;

- v) A copy of the written request for compensation from the government minister authorized to make the request under such law; and
- vi) The purpose and justification for such compensation.

The Compliance Committee shall only approve such compensation after being satisfied that:

- i) It is consistent with the law or regulations of the Public Official's country;
- ii) It is directly related to the execution or performance of a Company contract;
- iii) It is for a bona fide and legitimate business purpose;
- iv) It is reasonable and appropriate under the circumstances; and
- v) It is incurred in good faith and is transparent.

As noted above, where the provision of government services for which compensation is requested coincides with travel by a Public Official, the Public Official shall not also receive a travel per diem except for limited incidental expenses as provided in the company's travel policy. The Company shall not pay compensation for government services or meeting fees on days on which the Public Official does not provide services relevant to the Company's business or during unapproved stopovers.

H. Employment

The employment or retention of a Public Official or a relative of a Public Official can present a risk of violating anticorruption and conflict of interest laws. The Company shall not retain or offer employment to a Public Official or to a relative or dependant of a Public Official in an attempt to influence the Public Official.

The Company shall only employ or retain a candidate after it has fully satisfied itself that that person is among the best qualified to fill the job position and has no conflict of interest for the job position being hired. Company management must make reasonable inquiries as permitted by local law on the qualifications and background of the candidate prior to hiring in order to know if there is a relation or dependency of that candidate to a Public Official.

The following candidates must be referred to the Compliance Committee for approval prior to employment or retention by the Company:

- i) A Public Official;
- ii) A known spouse, sibling, child or parent of a Public Official;
- iii) An individual known to be financially dependant on a Public Official; or
- iv) An individual who has been recommended or requested to be hired or retained by a Public Official (whether or not there is a relation to or dependency upon a Public Official).

Compliance Committee approval is not required where a government or a government ministry, department or official agency requires the Company to hire or retain secondees under local law, even where the secondee is a Public Official or a relative or

dependant of a Public Official. However, Company management shall notify the Compliance Committee of such hirings on a quarterly basis, including full particulars of the government directive that requires the hiring of the secondee as well as a complete assessment of the secondee's qualifications for the job.

I. Third Parties

1. Agents

An Agent is a person or corporation who is retained by the Company to represent it in the development of its business interests in a High Risk Country.

a) Retaining Agents

Prior to retaining an Agent, the following steps must be completed under the direction and approval of the Compliance Committee:

i) Due Diligence

The Director, Corporate Security of the Company shall properly research and document in writing the reputation, background and past performance of the prospective Agent in the following areas (in consultation with appropriate expertise within the Company):

Management Information. Confirm the directors, officers and other members of management of the proposed Agent, where applicable. Determine if any of them are government officials, political party officials, or political candidates.

Ownership Information. Confirm the stockholders, partners or other principals of the proposed Agent, where applicable. Determine if any of them are government officials, political party officials or political candidates or related to any of the foregoing.

Affiliations. Confirm the business and government affiliations of the proposed Agent, its family and close associates.

Qualifications. Confirm the relevant qualifications of the proposed Agent or its management personnel to perform the services required in the contract.

Financial Information. Examine the audited or unaudited financial statements of the proposed Agent, where applicable, and confirm its ability to perform the services required in the contract.

References. Obtain character and financial reference checks about the proposed Agent.

Local Law. Confirm that the performance by the Agent of the services required in the contract is consistent with local law. Obtain an opinion of local counsel if requested by the Chief Legal Officer.

Compensation. Confirm that the level of compensation is reasonable given the experience of the Agent, the country where services are to be performed, the expected results, and the amount and difficulty of work to be performed.

Employee Certification. The Employee who is proposing retention of the Agent shall certify that the Agent has been personally interviewed and that there is no reason to believe that the Agent has violated this Policy or will violate this Policy regarding future activities on behalf of the Company.

ii) Contract

The Company shall only retain an Agent using a written agreement with the following provisions after having obtained approval from the Compliance Committee:

Precise definition of the scope of the Agent's duties.

The Agent's acknowledgment that it understands the provisions of this Policy and agrees to comply with its terms as well as any provisions of applicable law.

The Agent's acknowledgment that the contents of the agreement may be disclosed by the Company to third parties as appropriate.

The Agent provides representations and warranties that neither it nor any of its principals, staff, officers or key employees are Public Officials, candidates of political parties, or other persons who might assert illegal influence on the Company's behalf and that it will promptly inform the Company of any changes.

The Company expressly states that its choice of the Agent was made after considering factors that support a belief that the applicable law and this Policy would not be violated.

Assignment of the agreement by the Agent is prohibited without the Company's prior written consent.

Payment shall be by check made out in the Agent's name or wire transferred to a bank account that is registered in the name of the Agent.

Travel, entertainment and other miscellaneous expenses shall not be paid without the Company's prior written approval and detailed records of such expenses shall be kept.

The agreement shall provide for automatic termination without compensation in

the event of an Improper Payment in violation of applicable law or this Policy.

The Agent shall make annual certifications of its compliance with applicable law and this Policy and that none of the payments made to it by the Company have been directed towards a Public Official.

The Agent shall advise the Company of any accession to an official position.

The Company has the right to audit the Agent's agreement including the expenses and invoices of the Agent.

b) Managing Agents

The Company shall take measures reasonably within its power to ensure that:

- i) Any payment made to any Agent represents no more than an appropriate remuneration for legitimate services rendered by such Agent;
- ii) No part of any such payment is passed on by the Agent as a Bribe or otherwise in contravention of applicable law or this Policy;
- iii) It maintains a record of the names and terms of employment of all Agents who are retained by it in connection with transactions with public bodies or state enterprises. This record shall be available for inspection by the Company's auditors and, upon specific request, by appropriate, duly-authorized governmental authorities under conditions of confidentiality; and
- iv) The activities of the Agent are appropriately monitored to ensure that there is no breach of applicable law or this Policy.

2. Foreign Joint Venture Partners

A Foreign Joint Venture Partner is a person or corporation who is a local partner or joint venturer of the Company that deals with Public Officials in a High Risk Country.

Prior to entering into any joint venture with a Foreign Joint Venture Partner, the Company shall conduct a due diligence on such a prospective partner similar to the requirements for retaining an Agent. The Company shall (or seek to, in the case of minority owned joint ventures) obtain appropriate written representations and warranties from such Foreign Joint Venture Partner depending on the nature of the joint venture and the Foreign Joint Venture Partner.

3. Contractors

A Contractor is a person or corporation who supplies materials, labour or services to the Company.

All agreements with Contractors doing business on behalf of the Company in High Risk Countries shall include an anti-corruption clause approved by the Chief Legal Officer that requires such Contractors to conduct their business on behalf of the Company in compliance with the applicable anti-corruption laws and their contractual obligations with the Company.

Prior to entering into any contract with a Contractor that provides high risk services such as customs or immigration brokering in a High Risk Country, the Company shall conduct a due diligence on such a prospective Contractor similar to the requirements for retaining an Agent. The Company shall only retain such a Contractor using a written agreement with similar provisions as used in an Agent's agreement after having obtained approval from the Compliance Committee. The Company shall ensure that it manages the relationship with such a Contractor on a similar basis for Agents.

J. Contributions

1. Political Contributions

The Company shall make no political contributions in countries outside of Canada and Employees, Contractors, Agents or Foreign Joint Venture Partners are not authorized to make such contributions on behalf of the Company.

With regards to political contributions within Canada, contributions to political parties or committees or to individual politicians may only be made in accordance with the applicable law, and all requirements for public disclosure of such contributions shall be fully complied with. The President of the Company must approve all such contributions in Canada.

2. Charitable Contributions

Prior to making any charitable contributions in a High Risk Country, the Company shall confirm that the charity is a bona fide charitable organization, is not controlled or otherwise closely associated with any Public Official with decision-making authority relevant to the Company's business, and neither the charity nor the individuals controlling or managing the charity are included on any sanctioned lists. All donations must be made directly to the charitable organization and not to any individual. They must be receipted and accurately recorded in the Company's accounting records.

Charitable contributions in High Risk Countries shall be approved on the following basis:

Country Manager:	Up to US\$ 1,000
Officer of Company:	Between US\$ 1,000 and US\$ 5,000
Compliance Committee:	Above US\$ 5,000

K. Finance

1. Books and Records

- a) The Company shall make and keep books, records, and accounts which conform to high professional standards of accuracy and consistency and which, in reasonable detail, accurately and fairly reflect the Company's transactions and the disposition of its assets;
- b) All financial transactions must be properly and fairly recorded in such books of account and must be made available for inspection by the Boards of Directors as well as the Company's auditors.
- c) There must be no "off the books" or secret accounts, nor may any documents be issued which do not properly and fairly record the transactions to which they relate.
- d) The Company shall, in good faith, use its influence to encourage all joint ventures in which it participates to conform to the standards set above.

2. Audit

- a) The Director, Corporate Audit is responsible for auditing Improper Payments and accounting practices periodically at every significant business facility, and informing the Audit and Conduct Review Committee of every violation of this Policy that comes to its attention. The Director, Corporate Audit shall recommend procedures to prevent a recurrence of any such violation. The Director, Corporate Audit is also responsible for making special audits or investigations of suspected violations of this Policy.
- b) The Director, Corporate Audit shall provide a report on a quarterly basis to the Compliance Committee that shall be based upon the reports provided to it by the appropriate managers in High Risk Countries and shall include, but not be limited to:
 - i) A list and explanation of Facilitation Payments made;
 - ii) A list of gifts and entertainment provided to Public Officials and confirmation that such costs have been disbursed according to their respective approvals. This can include a lump sum cost for small promotional items;
 - iii) A list of travel costs provided to Public Officials and confirmation that such costs have been disbursed according to their respective approvals;
 - iv) A list of Public Officials reimbursed by the Company for serving on government approved committees, attending meetings or providing advice or a service and the amounts compensated to each Public Official;

- v) A list of Public Officials and dependants of Public Officials employed by the Company, explanation for their employment and the amounts paid for such employment;
 - vi) A list of existing Agents, status of their due diligence and amounts paid to such Agents by the Company;
 - vii) A list of existing Foreign Joint Venture Partners, status of their due diligence and amounts paid to them from the respective joint venture;
 - viii) A list of high risk service Contractors in High Risk Countries, status of their due diligence and amounts paid to them for their services; and
 - ix) A list of charitable contributions in High Risk Countries, the recipients' names and titles or political parties and the amount of the contributions.
- c) The Director, Corporate Audit shall also provide a summary of the above Compliance Committee report on a quarterly basis to the Audit and Conduct Review Committee. The Director, Corporate Audit shall make the above Compliance Committee report and the backup reports provided by the appropriate managers in High Risk Countries available for inspection by the Board of Directors as well as the Company's auditors.

L. Administration

1. Compliance

- a) The Chief Legal Officer shall be responsible for:
 - (1) the appropriate dissemination and understanding of this Policy; and
 - (2) the completion of an Annual Statement of Compliance (which makes reference to this Policy) by each Employee of record on September 30 of the prior year. Each Statement of Compliance received upon which a known or suspected violation of the Policy is reported shall be brought to the attention of the Chief Legal Officer and, if received from or is regarding an officer, shall also be brought to the attention of the President and the Chair of the Audit and Conduct Review Committee.
- b) The Vice President, Human Resources shall have the responsibility of obtaining a Statement of Compliance from each newly hired Employee.
- c) Electronic records of all Annual Statements of Compliance will be maintained by the Integrity Resource Centre. Corporate Human Resources will maintain the records for the New Hire Statements of Compliance.
- d) Any Employee who becomes aware of a prior or potential violation of this Policy is encouraged to contact the Chief Legal Officer who shall report same promptly to the President and to the Audit and Conduct Review Committee. Determination of

whether a particular past or proposed payment or action is in violation of this Policy shall be made by the Chief Legal Officer, in consultation with the President and/or the Chair of the Audit and Conduct Review Committee. Any Employee making a bona fide report of an alleged violation shall be fully protected and indemnified.

- e) If an Employee, Agent, Contractor or Foreign Joint Venture Partner is found to be in violation of this Policy, appropriate corrective action, including dismissal or termination of contract, shall be taken and promptly reported to the Audit and Conduct Review Committee.

2. Responsibilities

- a) The Chief Legal Officer and the Chief Financial Officer are responsible for establishing and maintaining the practices, procedures, and internal accounting controls necessary to implement this Policy and prevent any violation.
- b) The Audit and Conduct Review Committee shall review compliance of this Policy on an annual basis and shall establish procedures for obtaining appropriate reports for the purpose of such review.

**Prevention of Improper Payments (Policy A153)
Compliance Committee Request Form
Facilitation Payment over US\$ 100**

Date of Request:
Requestor's Name:
Requestor's Title:
Location:

Name, Title or Description of Public Official(s):

Amount of Facilitation Payment in US\$:
Purpose of Facilitation Payment:

Is the payment absolutely necessary to conduct Company's business?:
If so, why?:

Compliance Committee Approval

Chair _____ Date _____

Prevention of Improper Payments (Policy A153)
Compliance Committee Report Form
Facilitation Payment Resulting From Emergency Situation

Date of Report:
Date of Payment:
Requestor's Name:
Requestor's Title:
Location:

Name, Title or Description of Public Official(s):

Amount of Facilitation Payment in US\$:
Purpose of Facilitation Payment:

Was the payment absolutely necessary to conduct Company's business?:
If so, why?:

Please provide full particulars, including how personal health and safety were put at risk, locations and Employees involved:

Compliance Committee Approval

Chair _____ Date _____

**Prevention of Improper Payments (Policy A153)
Compliance Committee Request Form
Gifts, Entertainment, Meals or In Country Travel over US\$ 100**

Date of Request:
Requestor's Name:
Requestor's Title:
Location:

Name of Public Official:
Title of Public Official:

Description of gift, entertainment, meal or in country travel:

Cost of gift, entertainment, meal or in country travel in US\$:

Is the cost reasonable, and if so, why?:

Purpose of such gift, entertainment, meal or in country travel:

Compliance Committee Approval

Chair _____ Date _____

**Prevention of Improper Payments (Policy A153)
Compliance Committee Request Form
Out of Country Travel**

Date of Request:
Requestor's Name:
Requestor's Title:
Location:

Name of Public Official:
Title of Public Official:
Purpose of travel:

Description of travel itinerary in US\$:

Date	Airline Flight	Depart From	Arrive At	Ticket Class	Ticket Cost
				Total Cost	

Stopovers in US\$:

Journey	Date	City	Per Diem (or)	Accommodation Costs
Originating				
Return				
			Total Cost	

Description of accommodation itinerary at work site in US\$:

Date	Hotel	City	Room Type	# Nights	Room Cost per Night
				Total Cost	

Meals & Local Transportation in US\$:

Dates	# Days	Estimated Daily Cost	Total Cost

Dates & Location(s) of Business Meetings:

Dates	Location(s)	Type of Meeting(s)	Purpose of Meeting(s)

* Itemize the parts of the above itinerary that will be paid directly to travel vendors, reimbursed to the government (or Public Official), or by a travel per diem.

Compliance Committee Approval

Chair _____ Date _____