



# **TRAVEL & BUSINESS EXPENSES REIMBURSEMENT POLICY**

Version 1.0  
Date: 28 November 2019

**Approved by Creditinfo Group CEO**

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See *also* Excel "Expenses\_Template\_1.0.xls" Spreadsheet

## I. Creditinfo Compliance Policies

### A. Compliance Policies

Our Creditinfo Compliance Policies define the business and ethical behaviors that we all need to demonstrate when working for Creditinfo Group hf. and any other entity, subsidiary, and/or affiliate within the Group (the "Group" or "Creditinfo Companies"). They are mandatory. While these are for internal use, we also publish them externally in support of transparency.

Our Compliance Policies are available to the general public at <http://www.creditinfo.com/policies>. However, in certain circumstances, a Policy may use or reveal information which is not available to the general public and which could be considered of some importance internally and/or to Group shareholders, customers, business partners, and others. In such cases, the Policy will not be available at the URL above.

Employees may request a comprehensive list of the Group's Compliance Policies (including any policies that are unavailable at the URL above) via email at [compliance@creditinfo.com](mailto:compliance@creditinfo.com). Any compliance-related questions may be directed to this inbox.

*The Group's Compliance Officer, Carly Souther, can be contacted at +34.691.043.161, or via email at [c.souther@creditinfo.com](mailto:c.souther@creditinfo.com).*

## II. Reimbursement of Expenses: Terms & Conditions

Creditinfo reimburses employees for Expenses, which are defined as necessary expenditures and reasonable costs incurred in the course of doing their jobs. **The line manager must approve Expenses incurred by an employee in advance.**

In order for travel and business Expenses to be reimbursed:

- Within thirty (30) days of incurring Expenses, employees must submit such Expenses for reimbursement;
- In addition to obtaining the line manager's advanced approval for Expenses, employees must submit an "Expenses Report" (after incurring the Expenses) to the Line Manager for approval. See Section III. Expenses Template;

- The Expenses Report must be accompanied by receipts and/or other documentation substantiating the Expenses incurred, and,
- The Expenses Report must identify each item by (1) categorizing the type of Expense incurred, and (2) Business unit to ensure proper cost allocation.

Expenses deemed excessive by management may not be reimbursed and may be subject to progressive discipline, including up to termination.

Any falsification of Expenses Reports will be grounds for immediate dismissal from employment.

Unless otherwise specified by the line manager or Creditinfo Company, Expenses Reports should be submitted by the twenty-fifth (25<sup>th</sup>) of each month, and will be paid during the next payroll period.

### **III. Expenses Template**

Policy Supplement: Excel "Expenses\_Template\_1.0.xls" Spreadsheet

An Excel Spreadsheet has been provided as a template for Travel & Business Expenses.

The Group CFO drafted the "Expenses\_Template\_1.0.xls" spreadsheet for the convenience of Creditinfo Companies.

Although your Company is not required to report travel and business expenses in this format, the Group recommends this template as a tool for reporting expenses.

## Appendix 1.

### REIMBURSEMENT OF EXPENSES ACKNOWLEDGMENT STATEMENT

I hereby acknowledge that I have been provided with and read the *Travel and Business Expenses Reimbursement Policy*, and I understand that I am responsible for complying with the policy rules.

I understand that violation of such Policy may result in consequences including the refusal of reimbursement for expenses, and/or the termination of my employment.

I further agree that if I make any personal transactions in violation of this Policy, then I am financially responsible for any and all non-business related expenses.

I am informed and understand that the provision of the personal data contained in this form is necessary for the completion and execution of this Acknowledgement Statement.

I understand that the data will be collected and processed for the purpose of keeping record of conformity with this Policy on the basis of the company's legitimate interest in adopting, executing, and enforcing compliance policies that define the business and ethical behaviours that are expected of Creditinfo Employees.

I am informed that the personal data herein will be stored for three (3) years after the cessation of the employment relationship or until this policy is replaced or else derogated.

I am informed that I can (i) request access to, rectification of, and/or erasure of my personal data; (ii) limit its processing; (iii) object to its processing; (iv) request a transfer of my data; and, (v) lodge a complaint to the competent supervisory authority.

I am further informed that additional information on Creditinfo Group hf., the controller of my data, as well as the contact details of the designated Data Protection Officer may be consulted at <https://creditinfo.com>.

I understand that the information on this form is solely for the use of the Group and it is considered confidential information.

Name:

Title:

Supervisor:

Group Company:

Day/Month/Year:

Signature: \_\_\_\_\_

## SIGNATURE PAGE

Name: Mr. Stefano M. Stoppani

Title: Creditinfo Group CEO

Date: 28 November 2019

Signature: \_\_\_\_\_