

# CORPORATE CREDIT CARD POLICY

Version 1.0 Date: 28 November 2019

**Approved by Creditinfo Group CEO** 



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#### 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", "Creditinfo Companies", or the "Company"). 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 <a href="http://www.creditinfo.com/policies">http://www.creditinfo.com/policies</a>. 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 <a href="mailto:compliance@creditinfo.com">compliance@creditinfo.com</a>. 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 <u>c.souther@creditinfo.com</u>.

#### II. Credit Card Terms & Conditions

Use of Company credit cards is a privilege that the Company may withdraw at any time, with or without cause.

Upon an employee's termination from the Company, all cards must be returned to the Company's Finance Department, or the applicable department responsible for Credit Card management.

Any employee in possession of a Company credit card is solely responsible for all of the purchases on the card. The employee is responsible for ensuring that no unauthorized individuals use the card person.

Card numbers may not be distributed and should not be saved in online accounts.

Any credit card the Company issues to an employee must be used for business purposes only, and solely for purposes in conjunction with the employee's duties. Employees who



are issued credit cards shall not use them for any non-business-related purpose. "Non-business purchases" include any purchases that do not directly benefit the Company. Business expenses, such as food and lodging while on Company-approved business travel, may be paid for on the Company credit card if these purchases are consistent with the Company's Travel and Business Expense Reimbursement Policy and employment agreements.

Any purchases must be approved prior to purchase. The employee must submit the purchase request in writing/email or verbally to his or her line manager and obtain written approval prior to making the purchase. The employee should attach a copy of the purchase approval to the receipt when submitting the receipt to finance department and/or the line manager.

Any employee in possession of a Company credit card is responsible for obtaining and keeping all receipts related to purchases made on the Company credit card. If a receipt is lost, a written description of the items and the cost of the purchase must be recorded and submitted in the same manner as a receipt.

Receipts should be attached to the template provided. The template together with the receipts need to be submitted to the line manager at the end of each month, exact date can be agreed with your line manager. All receipts should be listed with a description of what the purchase was for in order to ensure proper accounting of the purchase.

If any employee uses a Company credit card for a non-personal purchase that is not within the scope of the employee's duties or the employee's authorization to make business-related purchases, the cost of such purchase(s) will be the financial responsibility of that employee unless otherwise expressed in writing by line manager. The employee will be expected to reimburse the Company immediately.

This Policy will remain in effect while the employee has a Company credit card or until a new policy has been issued and such policy clearly indicates that it is intended to be a replacement of this Policy.



#### Appendix 1.

## ANNUAL CREDIT CARD ACKNOWLEDGMENT STATEMENT

I hereby acknowledge that I have received a corporate credit card.

I have been provided with and read the Corporate Credit Card 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 cancellation of my card, 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 expenses and agree to reimburse the Company.

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 Date 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:
Day/Month/Year:



#### **SIGNATURE PAGE**

Name: Mr. Stefano M. Stoppani

Title: Creditinfo Group CEO

Date: 28 November 2019

Signature: