

Travel Policy

Author and issued by Creditinfo Group HR
6th July 2021

Authorised by
Paul Randall
Group Chief Executive Officer

Creditinfo Corporate Travel Policy

I. Introduction

A. Compliance Policies

Our Creditinfo Compliance Policies define the business and ethical behaviors that we all need to demonstrate when working for Creditinfo and any other entity, subsidiary, and/or affiliate within the Group (the "Group", "CI", "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 <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

Any compliance-related questions may be directed to this inbox. Creditinfo's Compliance Officer can be contacted via email at compliance@creditinfo.com

II. Purpose and Scope

A. Purpose

The first edition of the Creditinfo Corporate Travel Policy was developed by Creditinfo Group's Human Resources department on 28th February 2020, to ensure corporate travel, hospitality, meetings and events are administered in an effective, efficient and economical manner.¹ The latest edition of this policy was approved and published by Creditinfo Group on 6th July 2021

Each Employee/Contractor is responsible for managing and minimising the costs of travel, entertainment, and business meals. Each Employee/Contractor is expected to exercise good judgment when authorizing the use of, and/or when spending, Group funds. The Group will reimburse employees and authorized contractors (also known as "travellers" or "claimants") for reasonable expenses incurred in connection with necessary and authorized Company business.

Before travelling for business purposes or arranging hospitality, meetings, or events, travellers will **ensure that their objectives cannot be achieved in more economical ways (such as via video or teleconferencing)**.

¹ Updates may be made from time to time without written notice to individual travellers. The most recent version of this Travel policy can be found on Creditinfo's website and in the Onboarding Section – Policies section on Talent LMS

As travel is an inherent part of doing business, employees and contractors are hired with the expectation that they are willing to travel in accordance with these guidelines and provide supporting documentation for all expenses. See "**Travel & Business Expense Reimbursement Policy**". Where it is most economical to do so, after the business objectives of the travel have been achieved, then an employee or contractor must conclude his or her travel as soon as it is reasonably feasible. Costs arising from personal extensions to corporate travel are the responsibility of the traveller and will not be reimbursed by the Group.

B. Scope

This policy covers all individuals under contract with Creditinfo including full and part time employees, contractors and "bodyshoppers". It is applicable to anyone who incurs, authorises or reimburses Creditinfo funds. Any policy changes to meet specifically stated special requirements must first receive written authorization from his or her Line Manager.

Individual managers and divisional finance are responsible for ensuring that this policy is applied within their own area.

This policy applies regardless of how an expense has been paid for or is being reimbursed (e.g., company credit card, credit billing process via purchase order, personal credit card, expense report, etc.).

Creditinfo may refuse to process expense reports for reimbursement if travel has not been authorized or if expense claims have not been properly completed. To be eligible for reimbursement, expenses for travel, hospitality, meetings and events must be appropriate and incurred for business purposes, or in the fulfilment of official duties on behalf of Creditinfo. Non-compliance with this policy or claimants who falsify expense reports and / or supporting documentation or misappropriate funds will be subject to disciplinary action.

III. Procedures and Approval Process

A. Approval process

Each traveller must request approval in advance of travel either via Creditinfo approved travel agency or email to his or her line manager.

The Approval Request must state:

- The **reason for travel**
- an **estimated cost of the entire trip** (including transportation, accommodation, etc.). and
- all policy exceptions must be detailed on the Approval Request.

Claimants are not permitted to authorize (1) their own expenses or (2) the expense claims of subordinates if such claims include expenses for the claimant's own travel or business expenses.

Where the **Creditinfo Group CEO is the approver** or 2nd approver, this can also be his deputised person when applicable.

B. Booking process

All travellers are mandated to make all corporate travel arrangements through the **Creditinfo approved/selected travel agency (at date of publishing this is TravelPerk www.travelperk.com)**, unless otherwise authorized.

Changes to travel mid-trip must be made by the Creditinfo approved travel agency and in some instances must be approved by the travellers' line manager.

Information regarding how to use the system can be obtained from the CICEE Administration team in Prague, Czech Rep. via email to reception@creditinfo.com or Group HR.

Additional, help can be sought from Travel Perk directly using the chat box on the website, the concierge link when you are logged in <https://app.travelperk.com/home/special> or by phone <https://support.travelperk.com/hc/en-us/articles/115008033987-How-do-I-contact-TravelPerk->

IV. Air Travel

To control Creditinfo travel expenses, Creditinfo travellers are expected to accept the lowest logical * airfare when traveling.

* **Logical** - is not always the fastest or the cheapest, by way of definition, 'logical' would be for example:

- a. *you have two options where option 1 is €300 return indirect flight with 5 hour stop over vs. option 2 €400 direct flight. Logical in this instance would be option 2, the direct flight.*
- b. *You have two options, option 1 is €450 with one stop over for 90 minutes or option 2, €1500 direct. Logical would be option 1, the lower airfare where the trip duration isn't increased too much.*
- c. *Option 1 is €180 but you have to have an overnight stay, option 2 is €1400 direct. If able select option 1, whereby the flight, hotel and subsistence costs are still less than the direct flight, albeit consideration must be taken whether it will impact your work/job to be out of the office for another day and away from home an additional night.*

Air travel is limited to **Economy class** on regular scheduled air carriers.

A traveller may **claim airport taxes, departure fees, a baggage fee**, and other **mandatory air travel charges**, whether included in the cost of the airline ticket or charged separately. More than one baggage item may be claimed as required for destination meeting requirements.

For a total one way trip duration of more than five (5) hours or an individual flight is more than three (3) hours or longer**, a traveller can purchase **additional legroom** (in economy class), **priority boarding**, and **seats at the front of the aircraft where deemed necessary**.

** For clarity of definition **Trip Duration** starts from the time of take off of the first flight to landing at the final destination.

A. Class of service exceptions

When travelling to meet clients or external parties, (excluding travels for training, conferences or internal meetings) **in certain circumstances** (e.g. duration of trip, cost, possibility to rest before the meeting, etc.) **an upgrade to premium economy class**, possibly business class where premium economy isn't applicable, may be granted. Generally, this will be for individual flights that **are five (5) hours or longer or where the cost is more economical than adding the additional upgrades** (leg room, baggage, priority boarding, etc.)

In these cases, **approval by your Line Manager** must be sought in advance of any booking and the reason why this is necessary.

A traveller may accompany a **customer or potential customer who is traveling in business class** with prior authorisation of both their Line Manager **and** Creditinfo's Group CEO.

All requests for policy exceptions must be noted on your Travel Approval Request and must be approved in advance by your Line manager and Creditinfo's Group CEO.

i. Unauthorized Upgrading

Unauthorized upgrading of air tickets is considered a personal expense and will not be reimbursed by Creditinfo.

ii. Unauthorized Downgrading

A traveller may not downgrade air tickets to subsidize personal travel or to subsidize travel for non-Creditinfo accompanying individuals.

NB: If the air carrier downgrades a traveller, for any reason, the refund must be returned to Creditinfo via the Expense Report process.

B. Personal Travel Deviations

A traveller may be permitted to deviate from a scheduled business trip by adding a personal air segment, hotel, or car rental to the itinerary. It is the employee's / contractor's responsibility to have the Creditinfo appointed travel agency quote and document the lowest logical round-trip airfare for the corporate travel portion of the trip.

The traveller must produce a written (e. g. emailed) statement from the Creditinfo approved travel agency to be dated the same time as the actual travel date will be issued detailing the difference in the cost. No retroactive quotes will be accepted.

If **personal travel** is included, then the **traveller is responsible for paying any additional costs** that may be incurred with this additional (personal) travel.

The traveller must reimburse Creditinfo either prior to travel or within 10 days of the return date of travel. This reimbursement to Creditinfo applies even if the traveller chooses not to take the personal travel segment of the trip and fails to cancel it or where that portion of personal travel is not reimbursable.

An invoice will be issued for the additional costs.

These monies for reimbursement must be paid to the cost-centre that was charged for the corporate travel which may not be the traveller's contracted organisation and could be another Creditinfo company.

In the event of late payment, please be aware Creditinfo will charge two percent (2%) interest per day on late invoices.

B. Personnel Aboard Same Aircraft

In order to ensure the continuity of Creditinfo's operation in the event of an airline accident, **no more than six (6) or one-half of the employees - whichever amount is fewer travellers** - of a Creditinfo Business entity/unit should travel together on the same flight. Creditinfo's Group CEO must approve any exceptions to this Policy in advance of the flight.

C. Cancelled Reservations and Changes

If a trip has been ticketed and then cancelled, it is the responsibility of the individual traveller (or travel planner) to advise the travel agency of the cancellation prior to the departure date. This will ensure that electronic tickets can be refunded (if there is any value); or, if the ticket is non-refundable, this will ensure the cancellation is documented so that the amount of the ticket can be used toward future travel. Should it become necessary to change reservations after the ticket has been issued, the original ticket may, in most cases, be exchanged for a new airline ticket.

D. Lost Travel Documents

In the unusual event that a paper ticket was issued and has been lost, please contact the travel agency or issuing airline immediately for assistance.

E. Compensation

Compensation for delayed or missed flights will need to be applied for by the individual traveller with the help of the travel agency and the airline. The compensation should be paid to the company to cover for any additional costs incurred for additional hotel bookings paid for by the company. In instances where the individual had to pay direct and the monies not already claimed via company expenses, those monies will be paid to the individual. Whereby, other monies for personal elements for example, damaged, lost or delayed baggage or monies for the inconvenience of the delay, this will be paid to the individual.

F. Priority Pass

Priority Pass cards <https://www.prioritypass.com/> can be purchased for Creditinfo travellers who must travel **more than 5 individual long-haul (more than 5 hours) flights or 8 short haul return trips per annum for usage for Creditinfo business travel.** i.e. for frequent corporate business travellers.

The most optimal Priority Pass option should be purchased, generally this is the Standard Plus option whereby approx. 10 free visits to a lounge per annum and then all other trips are paid per visit as required.

When travelling with colleagues/partners for approved business travel, the traveller may take the additional people into the Priority Pass lounge as a guest(s) and the cost will be covered by Creditinfo. The Priority Pass should be linked to a Creditinfo company card or to a personal credit card whereby the traveller will subsequently request reimbursement via an expense claim – a receipt should be requested when checking into the lounge.

V. Ground Transportation

The most optimised means of transportation must be used while on Creditinfo business. The traveller should investigate the use of alternative transportation (i.e. airport shuttle, taxi, etc.) before deciding to rent a car.

By way of example, when commuting from London airports such as Heathrow, options such as Heathrow Express train is cheaper than a taxi or car hire to get to the city due to additional congestion charges and parking fees and does not represent an excessive difference in commute time.

A. Car Rentals

If Creditinfo business requires the rental of an automobile, travellers must use a preferred vendor, or if unavailable, the most economical alternative must be booked. If the car rental payment is made with a credit card that does not automatically include collision damage and liability coverage (CDW), then insurance must be accepted.

Ground Transportation details:

- Business purposes do not include travel between personal residence and regular workplace.
- All travellers are expected to rent **intermediate size cars or smaller**. If three or more Creditinfo travellers choose to share a car, the renter may upgrade to the next class.
- It is the employee's / contractor's responsibility to ensure that the **proper rate is being charged** at the time of rental. Please refer to your travel itinerary.
- **Insurance** is not included for any personal/leisure rentals. It is important that travellers check with their own insurance carrier regarding car rental coverage.
- **Fines** incurred due to parking, speeding or other violations of the law are NOT reimbursable and must be paid on or before the due date.
- Travellers are to **decline all fuel option purchases and return the car with a full tank of gas**. If circumstances prevent the refuelling of the car, a detailed explanation must be included on the expense report.
- All car rental expenses should be charged to the employee's company credit card or by personal credit card whereby the cost is subsequently reclaimed via expenses. Exception to this policy must be pre-approved by the traveller's line manager. *Please note: most car rental companies require the driver to produce the credit card used for payment in order to collect the car.*
- To receive proper reimbursement, an original copy of the **Rental Agreement** must be attached to the Expense Report as well as the credit card receipt.
- In the event a traveller has an **accident** in a rental car, they should follow the instructions as per the rental car agreement and claims made in line with such.

B. Transportation from Home to the Airport

Shuttle service or a taxi may be used for round trip transportation from the employee's / contractor's home to the airport, if the cost of airport parking equals a greater amount than the round-trip shuttle service.

C. Use of Taxi Service within foreign country

The daily expense for utilizing a taxi must not exceed the cost of a car rental. If the traveller is uncomfortable driving in a foreign country, a line manager exception may be requested.

VI. Accommodation

In places where Creditinfo travellers frequently travel, any negotiated corporate rates and/or Creditinfo preferred/approved accommodation should be used. Should preferred options not be available please refer to the guidelines below regarding 'in policy' requirements.

Alternatively booking accommodation can be done in advance with help from Creditinfo employees/ contractor in the travel destination to optimise costs.

Failure to follow the accommodation policy may result in the traveller paying the difference in the price. It is the traveller's responsibility to ensure the correct Creditinfo rate is booked and charged correctly.

A. Accommodation will be considered in policy if it meets the following guidelines:

- Creditinfo preferred hotel booked and charged at a preferred rate.
- A non-preferred accommodation, if there is no preferred accommodation in the city of travel or if the location of the Creditinfo preferred accommodation is impractical - Creditinfo's preferred accommodation rates class must be used as a guideline when reserving alternative accommodation.
- A non-preferred accommodation, if the rate is lower than the lowest available Creditinfo preferred rate in that city.

When Creditinfo preferred accommodation is sold out of Creditinfo's negotiated room type/rate, the Creditinfo approved travel agency will work to accommodate the traveller at the best available rate as per the guidelines above.

Large group bookings

Hotel bookings for meetings with nine (9) or more persons travelling to the same destination even if from different locations should be sent to Creditinfo's approved travel agency group booking department (details on the website or use concierge option) to negotiate better rates than the online rates shown. One booking can then be made for all travellers by the Creditinfo approved travel agency. **The individual flights for large group bookings if less than nine (9) people coming from the same destination** should be booked individually on the Creditinfo approved travel agency platform in the usual way.

Individual long stays or small groups for multiple days

If four (4) travellers to the same destination, even if from different locations, but less than nine (9) travellers, where the party will be staying for five (5) or more days, or for individuals staying more than (fourteen)14 days travellers in the party should negotiate directly with the hotel for pricing better than the online price. Once you have this in writing it from the hotel it should be sent to the Creditinfo approved travel agency to add to the booking. The written confirmation to be sent to the travel agency should include the price, contact person at the hotel and the contact details.

Bookings in hotels can include breakfast in room rate, however when breakfast is included in the room rate travellers are encouraged to eat breakfast at the booked accommodation,

rather than eating breakfast elsewhere and claiming the meal as an out-of-pocket expense. Self-catering e.g. Air BnB type properties, is preferred for longer stays.

In conjunction with air travel bookings, **all accommodation reservations or Creditinfo-room bookings must be made through the Creditinfo-approved travel agency, these should be done where possible on the same booking** i.e. not have separate bookings for air and accommodation. Provided it has been documented prior to travel in the Travel Approval Request or email correspondence with the traveller's line manager, then individual accommodation bookings may be made on the applicable preferred accommodation website.

This Policy does not apply if the traveller is attending a convention or meeting and there is a negotiated meeting rate at the host accommodation. Accommodation cancellations must be made per the accommodation's cancellation policy to avoid "No Show" charges. "No Show" charges incurred due to employee's / contractor's negligence will not be reimbursed.

If "**incidentals**" are associated with eligible / reasonable out-of-pocket expenses, a traveller may claim "incidentals" only from a commercial accommodation during an overnight stay; "incidentals" may include the following:

- Photocopying, printing, couriering for business reasons
- Wireless internet fees, if not already included in the overall accommodation cost or upgrading the internet speed in order to be able to work efficiently.
- Other reasonable out-of-pocket expenses incurred by the traveller within reason, subject to review and authorized by the signing line manager.

B. Accommodation Direct Billing

The employee's / contractor's company credit card, or personal credit card, must be used for accommodation if being billed direct. No accommodation charges of any kind are to be invoiced directly to Creditinfo unless pre-approved by the traveller's line manager or Creditinfo's HR Director or Finance Director.

C. Accommodation rates

Rates for accommodation vary significantly between locations, however **as a guide**, allowable rates for accommodation per night are up to: **€150 in capital cities** and **€100 in all other locations**. Please refer to the Creditinfo approved travel agency for guidance. **Anything out of policy** should be pre-approved by the by the traveller's line manager or Creditinfo's Group CEO.

Please book the most **logical and cost effective***** accommodation.

Logical and cost effective ** - is not always the cheapest, by way of definition, 'logical & cost effective' could be for example:

a) *If the accommodation is slightly more expensive than an alternative option but closer to where the meeting is being held whereby higher transportation fares to the meeting would ultimately make the cheaper accommodation more costly overall or where it would take more than forty-five (45) mins to get to the meeting destination or run risks of getting stuck in*

traffic and being late to the meeting, i.e. cities like downtown Istanbul, central Paris, central Rome in rush hour.

VII. Travel Meals / Subsistence

A. Traveller's Individual Subsistence

It is Creditinfo policy to reimburse travellers for reasonable meal expenses (breakfast, lunch, and dinner) incurred while traveling on approved Creditinfo business. What is deemed "reasonable" will depend on the location of travel.

If the traveller is not eligible for a daily travel allowance also known as 'per diem', receipts are required for all meals. All receipts must be itemized and imprinted with the name of the establishment. The date and amount of the expense must appear, but do not necessarily need to be imprinted. Excessive alcoholic beverages are not reimbursable outside of customer entertainment or business meals with external guests.

Meal expenses are reimbursable when overnight travel is required to conduct Creditinfo business and would include:

- A one-day trip takes the traveller outside their normal work location.
- Breakfast, if the traveller is required to leave home more than two (2) hours earlier than normal. As a guide breakfast should not be more than twenty-five euros (€25) when purchasing at a hotel.
- Lunch, and,
- Dinner when a traveller cannot reasonably return home until two (2) hours or more after normal working hours.

For travellers with a trip that is more than five (5) days where a 'per diem' is not already applied, this can be requested as an alternative to claiming per individually receipted items. The rate will be agreed with your line manager but as a guide for Europe, the rates used in Czech Republic published by the Czech government will be used as a guide for such rates.

B. Business Meals and Entertainment Expenses

This category is not to be confused with individual meals for traveling employees (See Traveller's Individual Subsistence above). Creditinfo will reimburse travellers for necessary and verifiable business meal, entertainment expenses, and internal catering.

For a business meal, entertainment expense or internal catering to be considered reimbursable, a business discussion must take place during, directly preceding, or directly following the event. Claimants may not claim meal allowances if a meal is provided at no cost to the claimant, such as meals included in the claimant's accommodation cost, events cost, including a business meeting.

VIII. Payment

Business meal or entertainment expenses must be incurred and reported by the most senior Creditinfo person within the hosted event or the organiser of the event.

Internal catering does not follow the payment guidelines above, but when expensing internal catering, the host cost centre must be entered on the expense report and the

following must be included: host name, event name, attendee list or name of organization hosting the event.

For business meals, entertainment and internal catering expenses, an attendee list must be submitted with request for reimbursement.

A. Attendance

A traveller hosting a business meal or entertainment should limit the business associates and other participants to only those who can be expected to contribute to the accomplishment of the business purpose.

B. Approval

Entertainment expenses in excess of three hundred Euros (€300) and all Creditinfo sponsored off-sites and team building events must have their line manager approval. The three hundred Euros (€300) limit is intended for an event, not for an expense report with multiple activities.

C. New Hire and Applicant Travel

Applicants must book travel via the Creditinfo approved travel agency.

The travel expenses of candidates for open Creditinfo positions will be reimbursed when properly pre-approved by the hiring or line manager.

Airline or train tickets should be charged to the hiring department. Candidate's car / fuel rental charges will be reimbursed. Accommodation can be direct billed where available. If the accommodation is not set up for direct bill, the applicant will need to pay via his/her personal credit card and submit charges to the appropriate Creditinfo Finance department for reimbursement.

D. Independent Contractors

Independent contractors must book travel in accordance with the Credit Travel Policy and all charges must be paid by the contractor and submitted to the appropriate department for reimbursement through invoice unless otherwise approved by the approver of the independent contractor. In the event that travel is booked by Creditinfo, the Creditinfo approved travel agency must be used.

E. Other Non-Creditinfo Travelers

The travel expenses of non-CI travellers accompanying a traveller on a business trip will be reimbursed only in those instances where the presence of such person is necessary or highly desirable for business purposes, and only with the advance written approval of the traveller's line manager.

F. Spousal and Guest Travel Expenses

Spousal / guest travel expenses will not be reimbursed by Creditinfo unless authorised by the traveller's line manager and only in exceptional circumstances (e.g. in line with relocation/ex-pat packages and visa applications applicable to such.)

IX. Miscellaneous Expenses

A. Telephone Expenses

Creditinfo realizes the need for travellers to maintain communication with their families while traveling. Travellers are encouraged to minimize the cost of these telephone calls by utilising video conferencing web applications. In the event of calls made from an international destination, Creditinfo will reimburse actual and reasonable personal call costs.

B. Non-Reimbursable Expenses includes, but is not limited to:

- Excessive alcoholic beverages outside of customer entertainment or external business meals;
- Laptop Bags/Cases;
- Personal credit card late fees; • Transportation between home and office on regular workdays;
- Traffic or parking tickets/fines;
- Additional travel or life insurance costs except where Creditinfo Company Travel Insurance is not provided.
- Any personal items lost, stolen or damaged while traveling on Creditinfo business;
- Expenses of a personal or private nature;
- Personal travel extensions, or travel by a spouse, relation, or companion excepted as detailed in other paragraphs;
- Parking and other transportation costs incurred around the regular workplace as part of a standard commute to work;
- Charges for services resulting from the negligence of the traveller, such as delivery of fuel, retrieval of keys from locked vehicles, etc.;
- Fee penalties incurred for non-cancellation of guaranteed hotel and airfare reservations, unless in an exceptional circumstance, subject to review and authorized by travellers line manager; and,
- Transportation, duties, taxes and other fees associated with the shipment of personal effects except where pre-approved (f.ex. relocations, ex-pat contracts, long term business stay/job secondment, etc.)

C. Meetings, Events & Group Travel

Group travel is defined as ten or more travellers traveling to the same destination for the purpose of conducting Creditinfo business.

Requests for meeting or group travel must be submitted to the line manager and Creditinfo's Group CEO or in his absence the Creditinfo Group CFO when contracts are required with airlines, hotels, conference centres and ground transportation suppliers.

Creditinfo's goal is to establish and communicate effective procedures for reducing meeting and group travel costs and to ensure consistent operation of all meetings. It is also the focus of Creditinfo to assist the meeting planner to more effectively negotiate travel related contracts and to ensure compliance.

Meal expenses for group travellers are eligible as follows:

- Meeting durations that are less than four hours, permitting normal meal periods and break times;
- Onsite locations such as CI offices, boardrooms, local boardroom rentals; and,

- A single traveller may claim for the total meal expenses, where appropriate, incurred at a business meeting.

X. Expense Claims

All Travel Expense Claim Forms should be submitted and processed in accordance with the appropriate policy applicable to their region/Business Unit and/or in line with Creditinfo's Expenses Policy.

A. Other Expense Form details

- The **Expense Form** should include an explanation of any deviations of the policy, i.e., the use of unauthorized travel agency, lodging, transportation or incidentals;
- Travellers who do not qualify for a **company credit card** must utilize their personal credit card when necessary; and,
- **Cash advances** should be requested only when the use of a personal or corporate credit card is not possible. Travel Cash Advances will only be issued for an authorized trip involving CI travel.

XI. Travel Precautions

A. Sharing Travel Information

Creditinfo strictly forbids travellers from broadly sharing personal corporate detailed travel itineraries on social media sites including Facebook and LinkedIn. Travellers may forward itinerary information to personal contacts as needed to ensure convenience and safety but sharing pertinent details for the purpose of social networking is not allowed.

Avoid posting negative "reviews" or comments about Creditinfo's preferred suppliers on social networking sites like Facebook, Twitter and Trip Advisor. Please contact the Creditinfo approved travel agency or Creditinfo's HR Director to report any negative experiences with Creditinfo's travel vendors.

The purpose of this code is to clarify the high standard of conduct that is associated with ethical business practices and to identify areas and situations where standards might be compromised and to describe guidelines governing such situations.

Creditinfo is judged on the collective and individual actions of its members and employees. Each individual must manage their personal and business affairs so as to avoid situations that may compromise the reputation of Creditinfo or that may lead to a conflict or suspicion of a conflict between them and their duties to Creditinfo.

B. Vaccines

It is the responsibility of the traveller to check if vaccines are required in order to travel to a specific country. CI will pay for such via the expenses claim form if pre-approval is sought of the traveller's line manager.

C. Visas

It is the responsibility of the traveller to check if visas are required in order to travel to a specific country. CI will pay for such via the expenses claim form if pre-approval is sought of the traveller's line manager.

D. Insurance

The traveller should travel in line with their Business Unit or local office travel insurance, ask line manager or person responsible for HR for details. Where no insurance is available, Creditinfo will reimburse pre-approved travel insurance.

E. Second Passports

In some cases, you may need to have two (2) passports due to sending passports off for specific country visas or because travel in specific countries is not allowed in another country. In this instance, Creditinfo will pay for this with prior approval from the travellers' line manager. Creditinfo payment or reimbursement of items mentioned letters B to E in this section is subject to discretionary prior approval from the traveller's line manager, based on the proportionality of the related expenses and necessity of the trip.

F. Emergency Contact Information

In case of emergencies, details of travel arrangements, including telephone numbers, should be left with the traveller's department along with a personal /next of kin contact information.

G. Health and Safety

The health and safety of everyone is of paramount importance in travel as well as in any other company endeavour. We must use caution and common sense and safeguard ourselves and any personal belongings as well as any company property.

The best way of ensuring your safety while traveling or working abroad is for you to know and understand -in advance- the relevant security risks in your destination and act accordingly. Please ensure you speak with your host in the destination and also please refer to the Travel Guidelines related to general personal safety when travelling published in Talent LMS <https://creditinfotraining.talentlms.com/learner/courseinfo/id:131>

If you are planning to travel to countries where there may be doubts or concerns about conditions such as political unrest, violence, natural disasters or epidemics, you should seek also seek advice in advance of booking and / or travelling. Many governments publish travel advice on dedicated websites, such as the Travel Advice Unit of the Foreign and Commonwealth Office in the UK which provides up-to-date advice on such problems at www.fco.gov.uk. Please also refer to Creditinfo's approved travel agency and also your official local advisory boards (generally government official websites) for local information.

The decision to travel should take all advice into consideration.

For those countries deemed as a high-risk, pre-authorisation must be sought from Creditinfo's HR Director prior to booking any travel.

H. Behaviour should match our company values when travelling on business

Behaving on a business trip is not complicated and is just about common sense. How to behave on a business trip is simple, it is a "Business" trip and you are representing yourself and Creditinfo both during normal working hours and outside of those hours too.

For a successful trip, do your homework in advance to understand cultural differences, what is deemed polite and what isn't. Know the agenda and what the plans are for the evenings.

Knowing what is planned for your meeting or conference will help you understand the basics of what is acceptable and what is not.

Please also refer to Creditinfo's policies on:

- Anti-Bribery and Anti-Corruption
- Code of Conduct Policy

Some things to remember:

- You are on company time.
- Your trip is being paid for by the company.
- You are representing the company both during normal working hours and outside of hours.
- Be culturally aware and respectful of local cultures & etiquette.
 - For example, dress appropriately.
- Be early and avoid being late.
- Be professional.
- Keep alcohol to a minimum.

SIGNATURE PAGE TO FOLLOW

PLEASE ALSO SEE APPENDIX I FOR INFORMATION ON TRAVELLING DURING COVID -19

APPENDIX I

This appendix will be valid until further notice as an addendum to the Creditinfo Corporate travel policy.

COVID19: Rules & Procedures

Section XII was made effective as of the 24th of August 2020 and has been amended as follows. This paragraph will continue to remain in effect until revoked.

During the pandemic, Creditinfo has acted proactively and decisively to protect all of our personnel² and partners. Your health and safety, and that of our clients, continues to be our highest priority.

Accordingly, to help minimize the transmission of COVID-19, the following guidelines will continue to apply³:

A. Work-related travel

- All non-essential business travel is suspended until further notice.
- Essential business travel shall be limited to situations where business cannot reasonably be conducted without face-to-face interaction or on-site visits.
- In addition to Creditinfo's standard travel procedures, as outlined in this Corporate Travel Policy, any business-critical travel⁴ must be pre-approved by Creditinfo's Group HR Director. Prior to booking any flights or accommodation, Regional and/or Country Managers' shall confer with Group HR Director.
- Continue using online video and tele-conferencing with clients or other business units to replace in-person meetings.
- Do not attend any conferences (either domestic or international) regardless of whether mass gatherings are permissible in the location where the conference shall be held.

² For the purpose of this Section XII, "Creditinfo Personnel" means all individuals under contract with Creditinfo Group hf. and any other entity, subsidiary, and/or affiliate within the Group; this includes full and part time employees, contractors, and "body-shoppers".

³ Certain exceptions may apply to Creditinfo entities located in travel bubbles/corridors, where a select group of countries have agreed to open their borders to each other but keep borders to all other countries closed. Speak with your Regional Manager for clarification.

⁴ 'Business critical travel' is where business cannot be conducted without face-to-face interaction or on-site visits.

B. Personal travel:

If you decide to travel to, or through (even if you do not get off the aircraft) a high-risk country⁵, you must notify your Line Manager about specific elements of your travel plans that could affect the health and safety of any Creditinfo colleagues and/or clients.^A

This information includes, but is not limited to, the destination country or countries you plan to visit, as well as any additional information that may arise, or otherwise be relevant to ensuring the protection of fellow personnel and clients.

^A *By way of example: prior to your travels, you needn't inform your Line Manager that you're staying at Hotel X for X days; however, if there is an outbreak at your hotel, then you should notify your Line Manager of this development as it would increase your risk of exposure to the virus).*

⁵ A 'high-risk country' is one that your government has deemed high risk for foreign travel. Check out your government travel advice online or contact your embassy in the destination country.

C. Procedures Upon Return from Travel

- During work related or personal travel, and/or upon returning from travel, if you become ill, and have virus- like symptoms, you shall contact a health care provider. You are likewise obligated to notify your Line Manager as soon as (reasonably) possible. In such situations, you should not return to work until obtaining medical clearance.
- If you test positive for COVID-19, then - as soon as (reasonably) possible - you shall advise (i) your Line Manager, (ii) Creditinfo's HR Director, and (iii) person within your Business Unit responsible for HR. Under such circumstances, you shall not return to work without first obtaining medical clearance.
- As a precautionary measure⁶, personnel returning from travel who do not exhibit virus-like symptoms may be directed by their Line Manager to work remotely (e.g., avoid the workplace and contact with colleagues) for fourteen (14) days. This procedure may apply even if the destination country is not on a high-risk country.
- In addition to adhering to local and national authorities' guidelines, Line Managers will seek guidance from their Country Manager, Business Unit HR representative, and/or Regional Manager about whether an individual should work remotely following his or her travels.

Such a decision may be dependent on the specific circumstances, as well as additional factors that are currently unknown. ^B

- Regardless of the circumstances, each returning employee should work with his or her Line Manager to set appropriate working arrangements.

D. General Travel Guidelines:

- Prior to booking any travel, everyone is responsible for checking to see if their travel destination has been added to the local government high-risk foreign travel list. Check online government foreign travel advice websites or by contacting the embassy/consulate in the destination country.
- Equally important prior to booking any travel, everyone is also responsible for checking entry requirements for their destination country, both the regular entry requirements and those specific to COVID-19.
- If traveling for work-related reasons, the individual traveller should also contact the local office/client to request:
 1. advice and guidance on the current COVID-19 situation in the destination country,
 2. information on entry requirements (to verify information located online or from the embassy/consulate), and
 3. information about what is expected to occur during the period when the individual is expected to travel.

^B For illustrative purposes only: The destination country may be added to the government's high risk list during the individual's travels or a few days after his/her return; or, perhaps the office includes key personnel, who cannot work remotely, who happen to be immunocompromised or are otherwise considered to be "high-risk".

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⁶ The purpose of such request is to determine whether an individual has been exposed to COVID-19 during his/her travels

- Each individual travelling for work-related reasons must pack and carry a travel kit that includes masks, gloves, hand sanitizer, & anti-bacterial/disinfectant wipes. Your office can assist with providing (for the cost of) this travel pack.
- Each individual shall do his or her best to abide by the general COVID-19 prevention guidelines:
- Two (2) meters of social distancing;
- Sanitize your hands frequently (either with soap and water for twenty (20) seconds or a hand sanitizer that contains at least sixty per cent (60%) alcohol);
- Wear your mask; and,
- Avoid personal body contact with people outside of your household – e.g., don't shake hands;
- If you plan on traveling during the pandemic, you can find additional tips in this short three (3) minute video: <https://vimeo.com/442298500>

Updates may be made from time to time without written notice to individual travellers.


The most recent version of this Travel policy can be found in the Policies section on www.creditinfo.com

SIGNATURE PAGE

Name: Paul Randall

Title: Creditinfo Group Chief Executive Officer

Date: 6th July 2021

Signature:  _____