



Travel Card Policy

Policy Number: PER-087

Effective Date: 12/01/2018

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PURPOSE: This policy is designed to help the employees of North American Lighting, Inc. (“NAL”) understand the requirements and expectations for the appropriate use of a NAL travel card. Where appropriate, authorized directors, officers and employees of NAL (“Cardholders”) receive a PNC/VISA credit card (hereinafter the “Travel Card”) they agree to follow the guidelines stated in this corporate-wide policy and procedure for all Cardholders. This Policy will be reviewed and revised annually to reflect business needs.

Program Scope and Objectives

The Travel Card program will provide authorized employees a Visa credit card issued by PNC bank. The card will display the employee’s name as well as North American Lighting. Since charges on the card will be paid directly by NAL, it should only be used for approved company business as described in (PER-013), and never for personal charges.

The purpose of the travel card program and related on-line expense reporting system, the Visa Intellilink system (hereinafter “Intellilink”), is to minimize the effort required by the employee and the Accounting department related to travel expense tracking and reimbursement.

PROCEDURES:

I. Eligibility

The Cardholder must be employed for at least 90 days and have manager approval to be eligible for a Travel Card. If circumstances merit a card prior to 90 days, approval must be received by Director of Accounting and Cost Control. To receive a card, Cardholders must follow these steps:

1. Fill out the Travel Card Approving Manager Memorandum (Appendix A), obtain their Manager’s signature on the form, and provide signed form to the AGM of Corporate Finance.
2. AGM Corporate Finance verifies that the request has appropriate approvals and applies for a Travel Card from PNC.
3. Cardholder takes training course and signs Agreement.
4. Cardholder receives and activates new Travel Card.

II. Individual Travel Card Credit Limits

At the time of issuance, individual Travel Card limits will be defaulted to \$3,000. Based on business needs,





Cardholders can seek approval from their Approving Manager to increase credit limits as needed. Maximum limits may apply. It is recommended that new Cardholders use Travel Cards for a minimum of one month to understand purchasing patterns before asking to extend credit limit.

III. Training and Agreements

Training is mandatory for new Cardholders before they receive the physical card. Training can be done on NAL's Business Applications. Once the Cardholder completes the training, the AGM Corporate Finance provides the Cardholder Agreement to be signed and dated by both the Cardholder and the Approving Manager. Training may need to be renewed at the discretion of the AGM Corporate Finance or the Approving Manager.

IV. International or Extended Travel Expense Planning

If the Cardholder is traveling overseas the Cardholder (not NAL) is responsible for contacting Visa to advise of traveling abroad. Cardholder must also contact the AGM Corporate finance to discuss appropriate limits when the Cardholder reasonably expects to exceed the current limits of their Travel Card. If a transaction is blocked at the time of purchase, Cardholders should contact the AGM Corporate Finance for assistance. Blocked or declined transactions can only be researched for up to seven (7) days.

Prior to extended or overseas travel, Cardholders or their approving managers should submit an Change Status Change Form (Appendix B) via e-mail to the AGM Corporate Finance that includes:

- Dates of travel
- Current Balance on Travel Card
- Requested Limit Increases

V. Expense Reports

Cardholders are required to reconcile all statements and receipts within 7 days upon return from a trip pursuant the Expense Report Policy (PER-013) through Intellilink.

The billing / statement period starts on the 16th day of each month and runs until the 15th day of the following month. The statements are received through Intellilink approximately three business days after the end of the billing period. If the statement period falls in the middle of a trip, the Cardholder may have charges from a single trip in two different statements.

Responsibilities:

All Cardholders MUST:

- Review statements within seven (7) days of receipt.
- Charge meals to their Travel Card and may not claim per diem for meals.
- Upload any required receipts to the expense reports in Intellilink.
 - Standard gas, meals, hotels, flight and entertainment receipts are not required receipts.
 - Extraordinary meals and entertainment receipts are required.
- Verify charges for accuracy against receipts.
- Provide transaction details in the reconciliation comments for each transaction to provide managers with sufficient detail for approvals.
- Complete Cardholder Dispute Form within fifteen (15) days of receipt of statement.





- Submit reconciled expense report to Approving Manager for approval within seven (7) days of returning from trip.

Approving Managers MUST:

- Review and approve Cardholders’ expense report along with reconciliation comments to ensure adherence to travel policies.
- Identify any questionable or ambiguous charges and follow-up with Cardholder accordingly.
- Approve all expense reports no later than 14 days after received by Cardholders.

VI. Disputed Items

In the event of a disputed item, Cardholder should complete the Travel Card Cardholder Dispute Form (see Appendix C) and send to AGM Corporate Finance. In addition, Cardholder must put “Disputed” in the description field in Intellilink. AGM Finance will work to resolve the disputed item. Additional information may be needed from the Cardholder.

VII. Lost, Stolen, and Fraud

Cardholders **MUST** report card loss or theft immediately to Visa at 1-800-685-4039 within the US or 1-76-644-3224 outside the US and the AGM Corporate Finance. Cardholders should never lend cards or give card information to anyone. Cardholders are responsible for protecting their card and password at all times.

If a card is lost or stolen, the AGM Corporate Finance works with the Cardholder and PNC to issue a new card.

VIII. Renewals

Expiration dates are automatically set to three (3) years after the issue date unless otherwise specified on the card. The AGM Corporate Finance will send out renewal cards automatically to the Cardholder for all active accounts. Before receiving the renewed cards, Cardholders may receive a new Cardholder agreement and may need to sign if necessary.

IX. Program Maintenance

a. Account Status Change Processing

To initiate any change, Cardholders must submit a Status Change Form (see *Appendix B*) to the AGM Corporate Finance including all current account information. Requirements and actions differ depending on the type of change:

Type of Change	Cardholder Requirements	Administration Actions
Cancellation	<ul style="list-style-type: none"> • Send cancelled card cut in half and all retained statements and receipts 	<ul style="list-style-type: none"> • Submit cancellation request to PNC. • Keep records for documentation retention.
Name	<ul style="list-style-type: none"> • Get new plastic card 	<ul style="list-style-type: none"> • Notify PNC the changes and request a new card • Send Cardholder an email confirming the request has been





		<p>received, processed, and when to expect arrival of new Travel Card</p> <ul style="list-style-type: none"> • Receive and distribute new card
Approving Manager	<ul style="list-style-type: none"> • Obtain authorization from new Approving Manager • Sign new Cardholder Agreement with new Approving Manager 	<ul style="list-style-type: none"> • Verify information accuracy and appropriate signatures • Change designated Approving Manager • Send Cardholder Agreement • Email responsibility e-mail to new Approving Manager
Credit Limit Increase (permanent)	<ul style="list-style-type: none"> • Obtain authorization and signature from Approving Manager 	<ul style="list-style-type: none"> • Verify information accuracy and appropriate signature authority • Notify PNC of credit limit increase • Record change in database

b. Exception Processing

If a transaction is declined at the time of purchase, Cardholders should contact the AGM Corporate Finance for assistance. Manual authorizations may be required for temporary credit limit extensions and one-time purchases at non-compliant merchants.

Temporary credit limit extensions may be required for one-time high volume or large transactions. Temporary credit limit extensions may be granted for a few days or may expire after one billing cycle. Permanent credit limit increases are treated as card status.

c. Terminations and transfers

If the Cardholder is terminated, the AGM Corporate Finance cancels the card immediately on behalf of the Cardholder. The card and associated documentation are obtained from the Approving Manager or GM Human Resources.

X. **Auditing**

a. Cardholders may be selected for random audits to ensure policy compliance. An email notification with details will be sent if the Cardholder is selected. In most cases, Cardholders will be asked to provide appropriate documentation to support transactions within a specified time period.

b. Internal Audit Requirements

The following circumstances may require a Cardholder audit:

- High value transactions;
- Unexpected high frequency;
- Numerous transactions with no supporting comments for reconciliation; and/or





- Questionable actions on corporate card.

An audit is a review of expenditures for adherence to policies and for the existence of support documentation. Cardholders will be audited for:

- Compliance with manager review and timely approval of expense reports;
- One-time expenditures over assigned credit limit, which requires justification and appropriate approvals;
- Questionable merchants; and/or
- Possible fraudulent use.

Audit criteria can be changed at any time by NAL. Internal reporting

c. Violations

Triggers for Internal Investigation include but are not limited to:

- Failure to comply with the expense reporting procedures, and/or
- Personal, illegal, or fraudulent use of a Travel Card.

NAL will conduct an internal investigation when misuse of the card is detected. Cards may be suspended at the discretion of NAL during the pendency of the investigation. Cardholders are required to cooperate with any internal investigation and provide any documentation necessary to resolve the investigation. Disciplinary action may require Cardholders to personally reimburse NAL for improper purchases. NAL reserves the right and Cardholder expressly agrees that NAL may deduct Cardholder wages as reimbursement for any purchases made on the Travel Card for non-NAL purposes.

NAL may use any disciplinary action it deems appropriate up to and including immediate termination. NAL reserves the right to pursue all available legal remedies, including but not limited to, prosecution of Cardholders who violate this policy. Cardholders shall be liable for payment of all court costs and expenses, including reasonable attorneys' fees, if the NAL prevails in any manner in a legal action related to the misuse of the Travel Card.





North American Lighting, Inc.

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TRAVEL CARD APPROVING MANAGER MEMORANDUM

Appendix A

This memo confirms you are the Approving Manager for the Travel Card requested for Cardholder _____ for Department _____. This card has a \$3,000.00 monthly credit limit and a \$3,000.00 single transaction limit.

As the Approving Manager for the card, you are responsible for reviewing and approving each expense report submitted by the Cardholder. If the expense report is not reconciled and forwarded within 7 transaction days of the statement date, it will escalate to you for action.

Please conduct the following for each monthly statement:

- Review Cardholders' expense report along with reconciliation comments no later than 14 days after received from the Cardholder.
- Validate that transactions comply with Travel Card policies and procedures.
- Identify any questionable or ambiguous charges and follow-up with Cardholder accordingly.
- Ensure there are valid receipts for each transaction.
- Inquire if Cardholder disputes have been properly initiated for any statement discrepancies.
- Forward approved statements to AGM Corporate Finance.

Once you have reviewed and approved the monthly statement, print and store in the Travel Card file folder until fiscal year end.

As the Approving Manager, you are responsible for monitoring Travel Card use within your cost center to ensure adherence to policies. Any suspicious activity should be reported to the AGM Corporate Finance.

Signed:

GM Initials: _____

Cardholder Signature

Approving Manager Signature

Cardholder Printed Name

Approving Manager Printed Name

Date: _____

Date: _____

APPROVAL

This Memorandum is being signed for the Travel Card ending ____ _ ____ _.

Cost Center to be billed: _____

Initial Credit Limit: \$ _____

Signed: _____

AGM Corporate Finance





TRAVEL CARD
CARDHOLDER STATUS CHANGE FORM
Appendix B

CARDHOLDER INFORMATION

_____	_____	_____
FIRST NAME	MIDDLE INITIAL	LAST NAME
_____ - _____ - _____ - _____		(_____) _____ - _____
ACCOUNT NUMBER		WORK PHONE

TYPE OF CHANGE

- Cancellation – *Card MUST be attached to this form to this form*
- Cardholder Name
- Approving Manager
- Cost Center / Department
- Temporary Credit Limit Change
- Permanent Credit Limit Change

CHANGE STATUS REQUESTED

Original Status: _____

Requested Change: _____

ADDITIONAL INFORMATION

_____	_____
EMPLOYEE SIGNATURE	DATE

_____	_____
APPROVING MANAGER SIGNATURE	DATE





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TRAVEL CARD CARDHOLDER DISPUTE FORM Appendix C

CARDHOLDER INFORMATION

_____	_____	_____
FIRST NAME	MIDDLE INITIAL	LAST NAME

ADDRESS

_____ - _____ - _____ - _____

(_____) _____ - _____

ACCOUNT NUMBER

WORK PHONE

EMPLOYEE SIGNATURE (Indicates the above information is accurate)

DATE

DISPUTE

- Unauthorized Transaction
- Duplicate Posting
- Erroneous Amount (Attach Sales Receipt)
- Other _____

MERCHANT NAME

AMOUNT

_____	\$ _____
_____	\$ _____
_____	\$ _____
_____	\$ _____

DESCRIBE DISPUTE

SEND DISPUTE TO:

[Insert Issuer's Contact Information]





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TRAVEL CARD CARDHOLDER USAGE AGREEMENT

Appendix D

This Cardholder Usage Agreement (“Agreement”) is being entered into on this ____ day of _____, 20____, between North American Lighting, Inc. (“NAL”) and _____ (“Cardholder”) who is an employee of NAL. Cardholder’s participation in the Travel Card Program is a convenience that carries responsibilities along with it. Although the card is issued in Cardholder’s name, it should be considered property NAL and should be used with good judgement. Cardholder’s signature below verifies that Cardholder has read and understands the Travel Card Policy (PER-087) and summarized in the guidelines outlined below and agrees to comply with them.

1. The Travel Card is provided to employees based on their need to purchase business-related goods and services. A card may be revoked at any time based on change of assignment or location. The card is not an entitlement nor reflective of title or position.
2. The Travel Card is for business-related purchases only; personal charges are not to be made to the card.
3. Cardholder is the only person entitled to use the card and is responsible for all charges made against the card.
4. Improper use of the card can be considered misappropriation of NAL funds which may result in disciplinary action, up to and including termination. Cardholders authorize NAL to deduct charges deemed personal from their wages and will cover any collections or attorney fees necessary to recover misappropriated funds.
5. All charges are billed directly to and paid directly by NAL. Any personal charges on the card could be considered misappropriation of company funds since the Cardholder is not paying the bank directly.
6. Cardholder is expected to comply with internal control procedures in order to protect company assets. This includes keeping necessary receipts until Expense Reports are approved, , reconciling Visa monthly statements and following proper card security measures.
7. Cardholders are responsible for reconciling their Visa Purchasing monthly statement and resolving any discrepancies by contacting the vendor and the bank.
- ~~8.~~ A lost or stolen card should be reported immediately by telephone to PNC Bank Customer Service at 1(800) 685-4039. Once PNC Bank has been notified, Cardholders appropriate travel coordinator should be notified by telephone.
9. Cardholder must surrender the card upon termination of employment (i.e. retirement or voluntary/involuntary termination). No further use of the account is authorized beyond Cardholder’s termination date.

Cardholder Signature

Manager Signature

Cardholder Printed Name

Manager Printed Name

Date

Date

