



Justt Expenses Policy

November, 2024



Section 1: Purpose and Scope

This Justt Expenses Policy (the “**Policy**”) aims to provide Justt Fintech Ltd., together with its affiliates and wholly owned subsidiaries (the “**Company**”), officers, employees, and service providers (as may be applicable) with specific guidelines covering business travels and other business expenses. The Policy also seeks to ensure fair and equitable treatment of the Company’s Employees by defining procedures for authorized business travel and miscellaneous expenses.

The Company accepts no obligation to reimburse Travelers for expenses that are not in compliance with this Policy and all other applicable Company policies. Travelers who do not follow these guidelines will be subject to delay or refusal of their request for reimbursement.

Section 2: Definitions

- “Employee”; “Traveler” means any individual employed by the Company, as applicable, or any third party who travels on business, or otherwise incurs fees on behalf of the Company, and at the Company’s expense.
- “Business trip”; “Travel” means an overnight trip during which the Traveler spends at least one night away from home.
- “Travel agency”; “Travel agent” means the company or the person in charge of booking travel, as detailed in Appendix A attached hereto.
- “Approver” means the Vice President or Officer who manages the relevant Employee’s department and is responsible for the budget bearing the travel cost. When the traveler is a VP or an Officer, the Approver shall mean the CEO.

Section 3: Before Traveling- Travel documents

- A passport is required for all travels outside their residence and must be valid for six months beyond the travel date.
- Travelers are responsible for securing their visas when required for travel.
- All reasonable visa-related expenses are reimbursable.
- Company shall not be responsible or liable for obtaining Traveler's visas or valid passports, and it is the sole responsibility of the Traveler (unless otherwise agreed by the Company).
- Where a Traveler Travels to a Business Trip which is combined with a personal vacation, Company shall only bear the insurance coverage for the duration of the business related Travel.

Section 4: General Preparation

Travel Request:

- Travel involving air travel or at least one overnight stay must be pre-approved in writing by the Approver:
 - 21 days in advance for overseas travel.
 - 10 days in advance for domestic travel.
 - Urgent cases shall be pre-approved in writing on a case by case basis.
- Travel requests should include the following:
 - Travel dates.
 - The purpose of the Travel or Business Trip.
 - The destination of the Travel or Business Trip.
 - Personal details.
- All Travels shall be considered based on the following criteria: (i) Financial efficiency and the link between the Travel and the Company's business goals; (ii) Can the Travel be conducted with fewer Travelers; (iii) Are meetings justified and optimize the capacity of the Company's employees?

Section 5: Flights

5.1 Flight booking

Subject to this Policy, Company Travelers may be entitled to flights that may be booked either indirectly, booked by the Company's G&A team members via the Company's dedicated Travel agency as detailed in **Appendix A**, or via an online booking system that means that the Traveler is booking the Business Trip independently, **Appendix B** shall detail the eligibility of Company's employees to book flights through either method. Any flight booking method is subject to the approval flow as indicated under this Policy. Please note- choosing a low-cost carrier is encouraged by the Company.

5.2 Airline Class

In accordance with this Policy, all airline travel must be in economy (coach) class unless the Traveler wants to upgrade themselves at their own expense or to use their miles/awards programs/frequent flyer programs.

Please note that any use of Traveler's frequent flyer miles for tickets or upgrades is solely at the discretion of the Traveler and shall not be reimbursed by the Company.

5.3 Airline and Airport Preferences

The Traveler's preferences (airline, flight, airport, etc.) shall be considered if they are aligned with this Policy and the cost is not higher than the lowest fare offered by the Travel agency or approved by the Approver.

Nonstop routing is preferred to allow efficiency but is subject to the best available fare set forth by the Travel agency.

5.4 Frequent Flyer Programs

Travelers are allowed to keep frequent flyer miles earned while traveling for business. However, flyer miles should not be the basis for choosing an air carrier, switching air schedules, hotel accommodations, or car rentals unless such choice is equal in cost to the lowest acceptable alternative.

5.5 Baggage

The Company will reimburse one checked bag if needed, only if it is not included in the ticket fare by default.

5.6 Flight changes

The Approver must approve all flight changes, including justification and stating price difference vs. original ticket.

5.7 Non - refundable expenses

The Company does not and will not reimburse the following costs:

Airline VIP club, meet and assist airport service, VIP terminal & VIP Lounge, airport VIP transfers, airport fast track service, tips, frequent flyer miles for tickets or upgrades.

Section 6: Transportation

The Traveler is expected to use its best judgment as to the method chosen based on business needs. By default, we encourage the use of a public transportation, when available.

6.1 Rental car

- A rental car may be approved when a Traveler is traveling to a destination where viable public transportation is unavailable or if the Traveler has several meetings scheduled during their stay at reasonable distances from one another.
- Driver license - The Traveler must hold a valid international license in accordance with the laws of the destination country. The Company takes no responsibility for obtaining such license and no claims shall be made towards the Company in that respect.
- Vehicle size - A compact car is the standard vehicle size approved for Company travel. Full-size cars are permitted when two or more people travel together.
- Additional costs - The Company will cover all costs, including comprehensive car insurance and gasoline. The Traveler must return the rental car with a full gas tank to avoid unnecessary expenses. Reimbursement for an auto rental expense will apply solely to the extent the amount paid was used for the Business trip- subject to satisfactory receipts provided by the Employee to Company's Finance department. Receipts are required to support car rental expenses and shall be the responsibility of Traveler to obtain and send such to the Company's Finance department.
- Rental Car Accident.
 - Follow the accident instructions in the rental car company's rental agreement.

- Immediately contact local police and exchange information with the other driver.
- Notify your direct manager
- Keep a copy of any documentation (rental agreement, police accident report, photos) until the case is finally closed.

6.2 Personal automobile

- Acceptable Usage - Traveler(s) may use their cars and be reimbursed when traveling on a Company Business trip. A normal commute does not qualify for reimbursement. Note that mileage allowances are meant to cover the cost of gasoline and wear and tear expenses. Therefore, the Company will not reimburse for these expenses separately. The only items that will be reimbursed are mileage, parking, and tolls.
- Mileage Reimbursement - If a personal automobile is used for Business trips, the Traveler will be reimbursed at the current applicable authorized mileage rate per mile (per Business trip destination), including gas.
- Tolls - All tolls incurred while traveling for business are reimbursable.
- Parking - All parking for business purposes will be reimbursed. Commute-related parking charges are not reimbursable.
- Accidents/maintenance/repairs/fines - Accidents, regular car maintenance, fines, penalties, towing, and repairs are NOT reimbursable.
- The reimbursement report must contain a copy of bills or receipts. Please indicate your destination and the purpose of the commute on your automobile.

6.3 Rail travel

This Policy stipulates that all train travel must be in economy (coach) class.

Train travel should be booked directly with the relevant train company or the Travel agency.

6.4 Other Transportation Costs

- Other reimbursable transportation expenses include the cost of buses, subway, taxis, airport shuttles, tolls, parking, and public transportation for business needs only. All such options should be arranged at the lowest available cost.
- The reimbursement report must contain a copy of bills or receipts. Please indicate your destination and the purpose of the ride on any transport.
- The fines for traffic violations, towing, car repairs, and trips for personal purposes will NOT be reimbursed.

Section 7: Lodging

7.1 Hotel

- Subject to this Policy, Company Travelers may be entitled to reimburse lodging and accommodation costs that may be booked either indirectly, booked by the Company's G&A team members, or via an online booking system that means that the Traveler is booking the lodging and accommodation independently, Appendix C shall detail the eligibility of Company's employees to book lodging and accommodation through either method. Any lodging and accommodation booking method is subject to the approval flow as indicated under this Policy.
- Upon checkout, the Traveler must review the hotel bill to compare the room charge to the rate quoted on the travel itinerary, to avoid incidental charges and query any discrepancies.
- The hotel reservation vouchers and invoices must be attached to the reimbursement report.

7.2 Extending your stay

Travelers wishing to extend their stay for personal reasons should pay for the accommodation, subsistence, insurance and other related travel costs at their own cost. Vacation days or additional days related to personal travel that are not a part of a business trip are not reimbursable.

7.3 Traveling for conferences

It is occasionally required that a Traveler stays in a specific hotel or event space while attending conferences. Provided that an advanced notification is given to the Travel agency and the special event rate is available at the time of booking, these specific hotels will be booked after receiving approval from the relevant Approver. If the requested hotel is unavailable, the booking shall apply to the nearest hotel with accommodation according to the terms of this Policy.

Section 8: Per diem allowance

- The per diem is a predetermined rate that covers the cost of meals and incidental expenses for each Business trip day.
- The daily per diem rate is inclusive of taxes and tips.
- Per diem allowances are reimbursable for Business trips only.
- Vacation days or additional days related to personal travel that are not a part of a Business trip are not reimbursable.
- Per diem reimbursements are based on departure and return times throughout the 24-hour day. Under this model, the partial per diems are paid for the first and last day of a Business trip and are pro-rated as follows:

Outbound departure

- Before/at 2 PM - 100% (75\$) per diem allowance
- After 2 PM - 50% (37.5\$) per diem allowance

Inbound arrival

- Before/at 2 PM - 50% (37.5\$) per diem allowance
- After 2 PM - 100% (75\$) per diem allowance
- Departure and return time must be indicated on the request for travel reimbursement.
- Per diem allowances are reimbursed after the Business trip is completed.
- Receipts for per diem allowances are not required if you pay for your meals and incidental expenses out of pocket.

Section 9: Business meals and Customer entertainment

- Business meals and customer entertainment expenses are costs related to customer hosting, prospects, and company guests. They will be reimbursed when they are essential to the Company.
- Each business meal shall not exceed \$70 per dinner per invitee.
Expenses planned to exceed \$300 must be reviewed and pre-approved by the Approver.
- The reimbursement report should provide itemized details for all required reimbursements:
 - The names of all attendees, their titles, and company name
 - Business relationship and the purpose for the business meeting
 - Name and title of the Employees present
 - Date, name, and location of the establishment
 - Type of entertainment and the expense involved
 - Itemized receipts for every expense claimed

Section 10: Gifts

- Gifts for the Company's customers, prospects, or suppliers must be clarified and approved by Approvers in advance of Travel.
- Gift shall not exceed a total cost of \$100 per Business trip.
- The reimbursement report must contain: (1) itemized receipts for every expense claimed and (2) the name of the gift recipient.

Section 9 and Section 10 shall meet all requirements of the Company's Anti Bribery Policy ("AB Policy"), and any actions which are not in accordance with the AB Policy terms and conditions are prohibited.

Section 11: Expense Reimbursement

Travelers are responsible for completing their expense reports in a timely and accurate manner using the following guidelines:

- Report should be completed within 10 days of returning from a Business trip.
- The reports submitted over 14 days old will be considered in violation of the Policy and may require the department VP's approval.
- Itemized receipts/invoices must be electronically submitted for all expenses. A credit card statement is unacceptable.
- The sum of the claimed amount must equal the amount on the receipts/invoices.

To the extent applicable, please elaborate on the reason in the comment section if there is any expenditure variance (a difference between the claimed amount and the receipt). Failure to provide detailed information may cause this reimbursement to be delayed, denied, or limited.

- All additional expenses, or over-the-limit expenses, must be pre-approved in writing by the Company's CFO.
- All completed and submitted expense reports will be forwarded to your direct manager (as applicable in accordance with the terms of this Policy) and all applicable financial approvers for review and approval, in certain limited circumstances, the applicable financial approvers may elect to receive Approver's approval for certain expenses.

Section 12: Non-Reimbursable Expenses

- The Company shall not reimburse the Traveler for any personal expenses not directly related to or associated with the Travel.
- The Company shall deduct from the Traveler reimbursement any expenses that deviate from this Policy

Section 13: Credit cards

- The Company may issue a personal virtual credit card to the Traveler.
- The credit card shall be issued personally. The credit card is not transferable.
- The credit card shall be used for pre-approved business expenses only.
- Any expenses paid by a corporate credit card must be documented, and the Traveler must present a valid invoice for each payment. Please note that a credit card statement is not deemed to the invoice.
- Any expenses incurred by a traveler using the credit card to pay for Per Diem allowances will be deducted from the Per Diem reimbursement.
- In case of a lost/stolen credit card number, the Traveler shall immediately report to the Company's finance department.
- the Company's Employees should be mindful that use of Company issued credit cards should be limited to the pre-approved uses of such credit cards, Company Employees may be subject to deduction against their salaries where not complying with this policy, in the

case of the Company's contractors or consultants, non-compliance with this Policy may result in the termination of the contractual relationship between the parties and further legal action, in the Company's sole discretion.

Section 14: Travel Insurance

The Traveler traveling abroad on a Company Business trip is covered by a corporate travel policy.

In most cases and for most Employees, when booking Travels via the Company, such bookings shall include travel insurance automatically. When booking Travels independently, the Employee is responsible for also purchasing travel insurance as necessary, subject to the terms and limitations set forth in [Appendix D](#).

Where an Employee combines a Business Trip or Travel with personal vacations in the same trip, the Company shall bear the costs of insurance only for those days that the Employee is engaged in Company business.

Other than as described above, a Traveler should not purchase any additional travel insurance, and the Company shall not reimburse any such additional travel insurance.

Some countries may require the travel insurance policy issued in the name of the Traveler. In this case and in case of any exceptional health condition, please contact the Company's Finance team members.

Having a copy of your travel insurance certificate with you when traveling is essential.

Section 15: Cellular communication packages and local Sim cards

Where a Travel requires the traveler to purchase cellular communication packages or sim cards ("Connectivity Solutions") which allows cellular connectivity and availability in the Travel destination, Any purchase of such Connectivity Solutions for Employees needs to be pre-approved in writing by Approver.

Section 16: Enforcement and Communication

This Policy will be enforced by Company's management and the finance department. It will

be reviewed annually and may be amended from time to time at Company's sole discretion.

Any changes will be communicated to all Company's employees.

This Policy shall replace and supersede, and other policies issued to the Company's employees with respect to the subject matter.

Section 17: Exceptions to this policy

Exceptions to this Policy are at the sole discretion of the CFO. The Company expects its Employees to be mindful of costs.

Appendix A

All countries except the United States

Amsalem – travel agency

Tamir Binyamin - travel agent

E-mail: tamir@amsalem.com

Tel (WhatsApp only):

For emergency out of office hours, 18:00-09:00:

Tel:

E-mail:

Appendix B

US employees:

Flights and hotel bookings should be booked independently and should not exceed this policy ceiling amounts.

Other employees and contractors:

Flights and hotel bookings employees traveling should be booked by the Company's G&A team members.

Appendix C - Flight Costs

- **Transatlantic Flights (Israel to U.S. and vice versa):** Economy Class tickets should not exceed \$1,500.
 - **U.S. Domestic Flights:** Economy Class tickets should not exceed \$600.
 - **Europe Domestic Flights (Israel to Europe and vice versa):** Economy Class tickets should not exceed \$800.
- When possible, all flights should be booked **in advance** to benefit from lower fares. **Booking for known travel (such as conferences etc.) must be booked at least 1 month in advance.**

Exceptions will be approved by the Approver.

- If the price is higher than 30% - the employee should get an approval also from the Director of Finance.

Lodging Costs

- The cost of the hotel room (including breakfast) will not exceed the rates below, unless specifically approved in advance. In the case of conferences and courses, when the hotel is dictated by the organizers, one must attach the necessary invitation and hotel details.

The following guidelines:

- **U.S. Accommodation:** The cost of a room should not exceed \$250 per night.
- **Europe Accommodation:** The cost of a room should not exceed \$250 per night (235 Euro),
- **Rest of the World:** The cost of a room should not exceed \$150 per night.
- **Israel:** The cost of a room should not exceed \$250 per night.

Appendix D - Expenses Items Policy Summary

Expense type	Receipt required	Special comments
Gift to Client / Vendor / Employee	Yes	
Business meals	Yes	Need to Add number of participants
Conference/trade show/registration fees	Yes	
Visas/Entry fees	Yes	
Office Supplies and stationery	Yes	
Airfare	Yes	Need justification and approval for not using travel agency.
Per Diem	No	Worldwide: \$75USD/day
Public Transportation	Yes	
Mobile/Cellular Phone	Yes	