

Corporate Credit Card, Travel and Expense Policy

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Authorized by:	ExCo (Executive Committee)
Policy Owner:	Chief Officer, Supply Chain & Procurement
	The Policy Owner is responsible for periodically reviewing and updating this Policy to reflect regulatory, best practice, and business developments.
Approver:	ExCo
Policy Questions:	Technical & Corporate Procurement

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INTRODUCTION

This policy outlines requirements and expectations for employees who incur expenses using NOVA Chemicals issued corporate credit cards while performing NOVA Chemicals' business. For purposes of this policy, NOVA Chemicals shall include NOVA Chemicals Corporation and its subsidiaries. This policy applies to all employees of NOVA Chemicals in accordance with the Delegation of Authority Policy, Business Conduct Policy, Controllers Guide and all other applicable policies and guidelines of NOVA Chemicals. For the purposes of this policy, employees are defined as permanent and temporary NOVA Chemicals' employees and as applicable, contractors or consultants. This Policy provides NOVA Chemicals' requirements and expectations related to reasonable incurrence and reporting of employee expenses, and the proper use of corporate credit cards to enable efficient and effective ways of credit card expenditure management.

This policy pertains to the following areas:

1. NOVA Chemicals Issued Corporate Credit Cards
 - Procurement Cards (Pcards)
 - Corporate Travel and Entertainment Cards (T&E cards)
2. Reimbursable Expenses, including Business Travel Expenses and Other Allowable Business Expenses.
3. Expense Reporting and Responsibilities.

For this policy to be effective, it is essential that all persons who incur the expenditure, submit the expense, or approve the expense follow the policy as outlined. Employees and leaders are responsible for understanding and following the requirements of this Policy and ensuring that expenses are reasonable and compliant. A breach of the terms of this policy will be reported to the employee's leader and/or Human Resources/Ethics & Compliance and may result in appropriate disciplinary action, up to and including termination of employment.

1. NOVA CHEMICALS ISSUED CORPORATE CREDIT CARDS

Guidelines for issuance of a corporate credit card when leaders are approving an employee's card application;

- Business Need
- Requirement for Role
- Required for authorized business use per [Payment Method Policy Matrix](#)
- Permanent employee (see exception below)

Leaders should review the guidelines on an annual basis as well as when an employee transfers to a new role. Contractors and Temporary Service Providers will not be issued Corporate Travel and Entertainment Cards. Procurement cards may be granted to contractors and temporary service providers on an exception basis only. The functional leader is responsible for raising the business need and recommending a reasonable limit. The exception must be granted/approved by the respective Supply Chain & Procurement VP or Director. These Credit Cards will be reviewed on an annual basis.

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Types of Corporate Credit Cards

Procurement Card (Pcard): Procurement cards will be held by designated cardholders in Procurement and the business teams. Employees who are not assigned a Procurement Card must use the Procurement Card Spend Request Form and seek leader approval to channel spend via the Procurement Card program.

Corporate Travel and Entertainment Card (T&E card): The T&E Card must be used for all business-related travel & entertainment expenses where possible.

Use of Corporate Credit Cards

- Employees will only use Corporate Credit Cards for business expenses incurred in accordance with all applicable NOVA Chemicals policies and guidelines and will only use Corporate Credit Cards for such business-related purposes within their scope of authority. Reference [Payment Method Policy Matrix](#) to determine allowable Corporate Credit Card use.
- Personal use of corporate credit cards is strictly prohibited. Policy violations will be reported to Ethics & Compliance. Violations will be dealt with as a Code of Conduct violation. In the event personal use should occur in error;
 - Procurement Card: Notify your leader and Card Administrator immediately so appropriate action can be taken to rectify payment to NOVA Chemicals
 - T&E Card: Notify your leader and make a personal payment directly to the Credit Card company. Show proof of both as a “receipt” attachment when completing your expense report.
- If an employee uses the Corporate Credit Card in a manner inconsistent with this policy, the employee will be liable for and will immediately reimburse NOVA Chemicals for all charges incurred, plus accrued interest, any cancellation fees, reinstatement fees or any other fees that may be charged to NOVA Chemicals as a result of their action.
- The Corporate Credit Card will be suspended until payment for personal use has been received. Accounts will be terminated for 1 year following 3 instances of personal use.

Card Administrators (Accounts Payable, Accounting Services Analyst) have the authority to suspend NOVA Chemicals' Corporate Credit Cards at any time.

Cancellation of Corporate Credit Cards

If, in the sole judgment of NOVA Chemicals, an employee no longer needs a Corporate Credit Card or has violated this policy, or, when an employee ends their employment with NOVA Chemicals, the employee, will immediately stop using the Corporate Credit Card, clear any outstanding balances and return the Credit Card to their Leader. The Leader will ensure card is destroyed. HR will notify the Card Administrator of the termination and the card will be cancelled.

2. REIMBURSABLE EXPENSES

Employees will be reimbursed for reasonable expenses incurred while conducting NOVA Chemicals' business. Reasonable expenses are those which are appropriate for the nature of the business being conducted. Reimbursable expenses shall include only actual expenses incurred and shall not be based on estimated expenses or per diem rates except where previously approved.

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2. A. Purchase of goods and services via Procurement Cards

Procurement Cards can be used for low-risk low value business purchases (typically less than \$5,000). Example of acceptable use **include but are not limited to**:

- Courier
- Locksmith,
- Office water delivery
- Promotional items
- Site Medical Related Expenses by site Medical Personnel only
- Stationery and Office Supplies
- Training NOT performed on any NOVA Chemicals site or elsewhere at NOVA Chemicals request (E.g. Courses & Seminars)

Also consult the [Payment Method Policy Matrix](#) for guidance,

To ensure safety and compliance the following types of transactions CANNOT be processed through the Procurement Cards, **include but are not limited to**:

- Field services for operations, maintenance, and projects.
- Engineering services
- Safety sensitive materials procurement (chemicals) and services.
- Spare parts and inventory materials
- IT services, equipment and software
- Fleet expenditure
- Office furniture

There are several suppliers (Grand & Toy, Office Depot) that have been issued a NOVA Chemicals Procurement Card to facilitate purchases to support the business.

Refer to the [Payment Method Policy Matrix](#) for further guidance.

2. B. Business Travel Policy and Associated Expenditures under Corporate Travel and Entertainment Cards

Guiding principles for business travel:

- *NOVA Chemicals' employees act responsibly and make safe and cost-conscious travel decisions.*
- *Leaders model responsible travel practices and discuss travel needs with their employees*
- *Consideration should always be given to the overall need vs. the cost of time and expenses for travel.*
- *Employees and teams will leverage available technology where possible, especially when it is strictly for internal meetings/business, to minimize travel.*

NOVA Chemicals has contracted with a travel management company (TMC) to provide safe, reliable, and cost-effective travel for its employees. **The services of the TMC must be used for all business travel arrangements to achieve savings from negotiated agreements, monitor cost-effectiveness for NOVA Chemicals, and locate travelers in the event of an emergency.** Note that, for liability reasons, NOVA Chemicals does not allow its travelers to book via other platforms, such as Airbnb, Expedia, etc. for business trips. Exceptions to this policy, will require the written approval of the leader/team leader of the employee's department to justify the expected financial loss NOVA Chemicals will experience. All company travel must be arranged by the TMC at least two weeks in advance to reduce company costs. Travel booked outside the TMC will be reviewed quarterly, and employees must insert comments in their expense reports to explain why the TMC was not used. Booking personal travel using the TMC is prohibited, this includes air/hotel/car.

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Air travel, hotel and car rental bookings should always be provided by NOVA Chemicals' preferred vendors, when available as indicated within the TMC booking site. All bookings should be made via the online booking tool unless utilizing an airline credit or cancelling a flight. Bookings via phone incurs additional cost to NOVA Chemicals.

In the event an employee has family or friends in the area of their travel, they may elect to stay with them instead of booking a hotel room. The employee will be given an out-of-pocket reimbursement of \$50/night USD. No receipt is required from an employee to take advantage of this program. With no hotel booked, the employee will claim an out-of-pocket expense for the night(s) they stayed with a family member or friend on their expense report.

Employees travelling outside their country of origin must carry an ISOS Card or download the mobile app, and comply with legal, security, immigration and medical guidelines for the country they are visiting as provided by NOVA Chemicals in the International Travel Readiness website in order to assist employees in cases of health emergencies or international crisis. NOVA Chemical's contracted TMC is integrated with ISOS functionality.

When mixing business and leisure travel, employees are responsible for all costs associated with personal and/or family travel when combined with business travel. The election of leisure travel should not increase the cost of the airline ticket. For example, if an employee is traveling and elects to return on Sunday instead of Friday the cost of the airline ticket should not be greater than the cost of returning on the Friday. Any leisure costs must be charged to the employee's personal credit card (meals, rental car, hotels, etc.). If extending a work trip for personal use, you must work with the vendor to ensure payment and insurance coverage for any personal portion of the travel.

Air Travel

NOVA Chemicals has negotiated airfares with select airlines aligned to NOVA Chemicals' travel patterns which represent overall savings to NOVA Chemicals. Airlines discourage their agents from issuing back-to-back and throwaway tickets. NOVA Chemicals prohibits employees from using such practices to achieve cost savings.

All airline travel must be booked in **Economy Class** unless a segment of the trip is 4 or more hours in length. Employees may utilize advance seat selection to upgrade seat selection to **Economy Plus** for flights 4+ hours in length. Segments are for flight times only; layovers do not count toward the 4 hours. For example, travel booked from Pittsburgh to Detroit to Calgary would NOT qualify for an economy plus class ticket since no segment of this trip is 4 hours or more in the air.

The use of Business Class is acceptable for international flights only. An international flight is defined within this policy to mean travel outside North America.

Exceptions:

- Use of complimentary upgrades
- Where the cost of flying business class is less than flying economy
- In countries where there is no option to fly economy class

Employees should purchase non-refundable fare tickets through the TMC if they are reasonably certain of their travel plans. Employees should limit change fees within reason.

One (1) airline club/lounge membership is reimbursable to frequent travelers (> 20 business trips requiring air travel/year). Leader approval must be obtained in advance of purchase. These memberships must not be used as criteria when making business travel decisions.

Flight Passes are prepaid one-way legs with Air Canada. If an employee books a flight pass, the cost (designated at booking with the TMC) will be assigned to the cost center associated with the employee's TMC account. Flight Passes are reconciled, with no action required by the recipient. Flight Pass functionality must be enabled on the user's TMC account.

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Employees must book car rental transportation through TMC. If you book a taxi or ride sharing service (ie: Uber), please understand and consider any safety risks associated with those types of services.

- **Car**

Intermediate size should be booked unless there is a case that makes it impractical for safe travel such as, winter travel, multiple team members sharing a vehicle.

- **Rented Automobile or Taxi**

A company pool car or rental vehicle must be used for company business when travel is required. Use of personal vehicles is only permitted when a pool car or rental vehicle is unavailable or impractical to arrange. Personal vehicles used for company business must have a minimum of \$1 Million (local currency) of liability insurance. Employees will be paid for use of a personal vehicle at the current NOVA Chemicals' mileage rate. Mileage allowance rates are established to cover reasonable costs for regular operating expenses of the vehicle (gas, oil, maintenance, and insurance).

Personal use of a rental vehicle is prohibited as NOVA Chemicals would be liable from an insurance perspective. Rented vehicles or taxis may be used for local business travel if required for business purposes. When business and personal travel are combined, the rental vehicle should be returned at the end of business portion of the trip and a new rental car should be obtained for the personal part of the trip. Your Corporate Credit Card should NOT be used for the personal rental car.

See also NOVA Chemicals' [Safe Driving Procedure](#) for more details.

- **Parking**

Parking at the airport while on business trips will be reimbursed, except for extended trips where taxi transportation to and from is more economical. Long-term parking is encouraged. Parking when required while conducting business away from the normal workplace is reimbursable.

- **Overtime Travel**

Employee to consult with leader/team leader prior to travel.

Lodging

Standard rooms must be booked through the TMC unless an alternative recommended standard has been negotiated with a specific property (i.e., free upgrade to concierge level). **Any deviation** from the policy should be justified and approved by the employee's leader/team leader prior to booking.

- NOVA Chemicals preferred hotels must be used where available.
- If your hotel does NOT have an on-site fitness center to use, NOVA Chemicals will cover the daily cost of a fitness center.

Travel Insurance

Employees are covered by NOVA Chemicals' insurance policies only when travel is booked through the TMC; any additional flight and medical insurance is not recommended by NOVA Chemicals' TMC and purchased by an employee is considered personal and is not reimbursable.

Rental Car Insurance:

- Always decline additional rental car insurance provided by the vendor. To ensure adequate coverage, it is important that rental cars are booked with our TMC and with one of NOVA Chemicals' preferred vendors (Avis or Budget) using the corporate travel card in all cases where possible. If the vehicle you are renting has any existing damage (scrapes, dents, or scratches) you must receive written documentation from the rental company prior to leaving.

Corporate Travel and Entertainment Card Coverage:

- **Covers Loss and damages to rental vehicles:** Does not include trucks, motorcycles, or vehicles with a MSRP over \$65,000; Cannot exceed 48 days; No limit to damage or theft to vehicle; Third party liability not included.

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- **Flight / Bag insurance:** Covers loss, theft, missed connection, delay by plane or bag (\$500 dollar limit); Will pay for a reasonable living expense incurred by a missed connection; Will pay for reasonable living expense for delayed flights over 4 hours; If bags are delayed for more than 6 hours will pay for emergency clothing and other sundry items.
 - **Hotel Burglary:** With proof of loss, will provide replacement for loss (\$2,500 per occurrence)
 - **Travel Accident Insurance:** \$500,000 coverage

Employees are covered by NOVA Chemical's Business Travel Accident (U.S.)/Occupational Accident (CA) policies while on business travel. Visit the HR web for additional information regarding these policies.

Meals

Employees will be reimbursed for reasonable and appropriate meal expenses along with a fair gratuity while traveling for business.

The most senior employee present at an event is responsible for payment of the meal expenses.

Laundry/Dry Cleaning

Reasonable laundry and/or dry-cleaning costs incurred while on out-of-town business trips in excess of seven days are reimbursable.

Passport Application and Renewal Fees

Passport application and renewal fees required for business travel are reimbursable for North American based employees who would not otherwise hold a passport. Leader approval must be obtained prior to applying for a passport or renewal. Passports are expected to be acquired in a cost-effective, proactive, non-expedited manner.

Reimbursement is for the employee only and does not cover family members.

Mobile Devices

Procurement of new Wireless Devices will be approved by Leadership through the mobile request form in FreshService. The mobile support team will monitor for approved requests before placing the phone order. All costs associated with the hardware procurement will be paid by IT.

All hardware upgrades and replacements will be managed by IT. Hardware upgrades will be determined by IT based on lifecycle of the device. Replacement of broken hardware, that is not eligible for an early upgrade, will be managed by IT. Additional accessory orders such as power cords, car chargers and cases are the user's responsibility to purchase and charged back to their cost center.

Users traveling outside of home country, with NOVA issued Mobile Devices for business purposes, must submit the ["Roaming Plan Request" form in Freshservice](#) at least one week prior to departure to obtain the most cost-effective roaming package. If you travel often, it is encouraged to log a ticket to the mobility team to have the best mobile package rates applied to your account. Users are required to provide the dates of travel, destination country and projected usage so that the appropriate roaming features can be added to the line.

Foreign Exchange Costs

Foreign exchange costs supported by credit card or bank transaction slips are reimbursable. The corporate rate as provided by Corporate Finance, for the month of reimbursement may be used if receipts or statements are not available.

Dependent Care

In certain circumstances, employees will be reimbursed for dependent care costs when they have been pre-approved by their leader/team leader. Expense claims must clearly state the reason for reimbursement and include pre-approval documentation.

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Reward Programs

Personal participation in a rewards program to earn points or other benefits is acceptable, however, membership in these programs must not be used as criteria when making business travel decisions. It is always expected that NOVA Chemicals' associates will use our TMC and preferred vendors when booking travel arrangements.

Mobile Applications

Exercise caution when using mobile apps for services (Uber, Skip the dishes, etc). Ensure you have selected your personal card when using the app for personal expenses.

Extended Travel

For business trips up to 3 weeks in duration, NOVA Chemicals will not cover the cost of family members travelling to the location where the employee is conducting NOVA Chemicals business. However, employees have the option of travelling back to their home location during this timeframe assuming it does not interfere with expectations of the business requirements. For business travel extending beyond 3 weeks, the following applies:

- For business trips extending beyond 3 weeks and up to 4 months in duration, NOVA Chemicals **Extended Business Travel Program** will be used
- For business travel related to continuing work at a NOVA Chemicals work location on a part-time basis, NOVA Chemicals **Commuter Program** will be used
- For business travel in excess of 4 months, the NOVA Chemicals **Assignment Program** will be used.

Details related to [relocation and assignment program](#) benefits can be found on the HR Website under My Work/Life > Programs. Eligibility for Extended Business Travel, Commuter or Assignment Programs need to be approved by an employee's immediate leader in consultation with the Mobility & Relocation Specialist.

OTHER ALLOWABLE BUSINESS EXPENSES

The following covers the most common business expenses. Employees will be reimbursed for reasonable business expenses incurred according to this policy. Leader/Team Leader judgment must be exercised for specific items not mentioned or when circumstances warrant deviations from this policy. All employee expenses should be evaluated based on the same judgment and consideration that would apply to any business transaction.

Professional Fees

Approved professional association membership fees for the purpose of maintaining accreditation may be reimbursable. If approved, a receipt confirming payment is required to be submitted.

Individual membership dues (personal professional memberships) that are in the name of the employee (i.e., Law Society, CPA, APEGGA, LM, or CBA, etc.) may be a reimbursable expense as long as they align with the employee's current role at NOVA Chemicals. If approved, the use of the Corporate T&E Card is allowable. Where the Corporate T&E Card is not accepted, the fee must be paid personally by the employee and submitted for reimbursement.

Business Entertainment and Team Building

Employees should consult the [Anti-Bribery & Corruption Policy](#) on reporting requirements regarding the giving and receiving of gifts and/or entertainment. Employees may be involved in entertaining clients and business associates while performing company business. Reasonable entertainment expenditures directly related to the active conduct of business are eligible expenses. Details must be provided in the expense report, detailing the names and company affiliation of those entertained.

Staff social functions are not allowable business expenses unless approved in advance by a Senior Vice President.

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Personal Entertainment for trips over 7 days: Movies, entertainment venues, public transportation are reimbursable up to \$50/week. – Charge to the Corporate T&E Card where possible.

Work Visa/Permit

All Work Visa/Permit(s) applications must be discussed with and approved in advance by NOVA Chemicals' Human Resources and [Immigration legal team](#). Once approved, employees may use their Corporate T&E Card to pay for resident work visas at the border.

Industry Association Dues and other Corporate Memberships (in the name of NOVA Chemicals)

Any membership in any industry association in the name of NOVA Chemicals must be approved by the respective Vice President.

EXPENSES NOT PAID FOR BY NOVA CHEMICALS

The following list is given only as a guide and is not necessarily a complete list:

- Personal entertainment for other NOVA Chemicals associates (including meals) that are not business related.
- Airline and travel insurance.
- Taxi fares or mileage to drive excessive distances for meals.
- Traffic fines, court costs and parking violations.
- Hotel expenses duplicated as a result of holding reservations while on a trip to another city
- Nexus and global entry application and renewal fees unless authorized by the employee's leader.
- Annual premiums for personal property insurance or annual fees for personal credit cards, including liability insurance for lost cards.
- Barbers and hairdressers.
- Car washes for employee-owned cars.
- Transportation to and from the employee's residence and regular place of business.
- Briefcases and other items for personal use.
- Contributions to public office.
- Holiday, and staff social functions except as approved in the leader facing [Holiday Policy](#)
- Retirement gifts and retirement celebration events except as approved in the leader facing [Retirement Gifts and Events Policy](#).
- Gifts, and going-away luncheons for employees leaving NOVA Chemicals. Please see [Recognizing Moments that Matter](#).
- Unauthorized membership dues, subscriptions, or fees.
- Babysitter fees
- Kennel costs unless pre-approved.
- Doctor bills, prescriptions, and other medical services.
- Personal phones and charges for use of such phones, except as outlined in this policy; and
- Airline tickets for family members except where NOVA Chemicals has identified a business need to incur the cost.

3. ON-LINE EXPENSE REPORTING AND RESPONSIBILITIES

NOVA Chemicals expects that expense accounts will be completed ethically and accurately. Prior to the procurement of travel expenses, catered food, or expenditures related to the attendance of a conference you should consult with your leader.

Employee Responsibilities

- Use the On-line Expense Reporting Tool (Concur) where it has been implemented for the submission of reimbursable expenses submitting an expense report on a monthly basis to avoid delinquency fees or penalties of any kind.
- Review your expense reports for completeness and validity.

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- Ensure physical corporate credit card and account number/login information remains secure. The authorized cardholder is the only person entitled to use the corporate credit card and is responsible for all charges made to the card.
 - Review expense report submission to ensure expenses are accurately recorded and incurred solely for the purpose of NOVA Chemicals' business, and that the expenses are properly itemized and approved. Expenses must be recorded by type of expense (i.e., hotel, transportation, meals, out of pocket, etc.) to ensure proper accounting distribution and tax treatment. Hotel bills must have the meals broken down and reported by the correct meal expense type.
 - Limit expense report submissions to 1 report per month.
 - Cardholders must log into their account with the bank/Credit Card Provider monthly to ensure their account is current, and the outstanding balance agrees with the expense report they are submitting for approval. Expense credits/refunds in the month issued/received. Immediately report lost/stolen cards and fraudulent charges if (notify the Credit Card company and NOVA Chemicals). Failure to promptly notify the Credit Card company will cause the employee to be personally responsible (or to reimburse NOVA Chemicals) for any charges, which occur.
 - Read and understand this, Policy. Participate in training about this Policy and follow this Policy in their day-to-day activities performing work for NOVA Chemicals.

Corporate credit cards will be suspended at 45 days past due until rectified/account reconciled. Accounts will be terminated for 1 year following 3 instances of reaching 60 days past due in addition to potential disciplinary action.

Reinstatement of the Corporate Credit Card will depend on a review by the leader and the Card Administrator and settlement of the outstanding account.

Receipt Requirements

- Employees are required to submit receipts for all transactions of \$30.00 (local currency) or more for auditing and leader approval.
- Receipts are expected to be submitted online at the time the employee submits their expense report for approval. Employees using a manual process for submitting expense reports are also required to scan or email their reports and supporting receipts to Accounts Payable at the time of on-line submission.
- All receipts must include the name, date and amount of the transaction and detail of items purchased.

LEADER RESPONSIBILITIES

- Reviewing Card transactions and reimbursable expenses in Concur along with corresponding receipts on a monthly basis within the cutoff dates
- Determining which employees require a Corporate Credit Card
- Ensuring cards are destroyed upon termination
- Ensuring purchases comply with [Payment Method Policy Matrix](#)
- Ensuring proper approval per [Delegation of Authority Policy](#)
- Notify Corporate Card Admin if an account/card should be suspended (employee goes on leave)
- Review late fees when approving expense reports and reject back to employee if they should be paid personally.
- Ensure expenses submitted on expense reports and marked "personal" have been personally paid by the cardholder.

Employee Expense Reports

Submitted employee expense reports will generate an e-mail notification to leaders informing them that a completed expense report is ready for approval. Expense reports must be approved by the employee's leader/team leader or delegate, in accordance with the [Delegation of Authority \(DOA\) Policy](#). Leaders are responsible for ensuring that supporting documentation has been provided prior to approving expense reports. An expense report will not be released for payment until it has been approved by the leader on-line.

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Approvals of Expense Reports

Employee expense reports are to be approved by the leader of the employee's organizational assignment in a timely manner (within the cutoff dates) to meet business reporting needs and to avoid delinquency fees or penalties of any kind. Leaders will approve employee expense reports on-line. By approving an expense report, leaders certify that they have reviewed the expense report, and it is accurate and in compliance with NOVA Chemicals' policies and guidelines.

If an employee incurs expenses while working on projects outside of their organizational assignment, the leader of the alternative cost object may review and approve the report. The organizational leader would have to "Approve & Forward" the report in Concur.

The person who is approving cannot approve expense reports that include expenses for meals, entertainment, etc. that name themselves. When a leader and direct or indirect subordinates are traveling together on a business trip, or incur any business expense together, the senior person should pay for and claim the expense; except in cases where an external third party is involved, in which case the host/business contact should pay for and claim the expense.

On-line leader approval of the expense report will generate an e-mail notification to the employee that the expense report has been approved. A leader may choose not to approve an expense report and choose to send back an expense report on-line to the employee. This will generate an e-mail notification to the employee that the expense report was returned. It is the leader's responsibility to follow-up with their employee regarding the nature of the return should revisions be required.

Awareness and Training:

Employees: NOVA Chemicals will provide regular training to employees on this Policy. This training will also form part of the onboarding process for all individuals who work for us, whether as an employee or a contractor.

[Frequently asked Questions \(FAQ\).](#)

Reporting Non-Compliance:

Everyone is encouraged to raise concerns about any issue or suspicion of violation of this Policy. If you are unsure about whether a particular act requires reporting, employees can reach out to their Leader, Ethics & Compliance or a member of the Legal Team who will support employees with reporting the matter.

NOVA Chemicals has also established a reporting system called EthicsPoint® which employees and anyone else may use for the purpose of reporting known or suspected misconduct or raising ethics or compliance-related questions. EthicsPoint can be reached by phone at 1-800.985.7423 and is available 24 hours a day, seven days a week, and is operated by an external third party. Online reports can also be made anonymously or otherwise to [EthicsPoint](#).

COMPLIANCE

This policy will be evaluated on an annual basis to determine whether amendments are warranted. All material revisions to this policy must be approved by the ExCo.

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