

Travel and Entertainment Policy – Reimbursement Procedure

1. Detail Policy

1.1 Scope

This policy applies to all Suppliers and their Contractors who travel on Fincantieri Services USA's behalf.

1.2 Purpose

The purpose of this policy is to establish rules and guidelines regarding reimbursement to Suppliers ensuring that (i) expenses are reasonable and incurred during the course of FSU Company business with care and discretion; and (ii) reimbursements to Suppliers are on a fair and consistent basis.

2. Rules and Guidelines

2.1 Travel Arrangements

All travel arrangements, including air transportation, lodging and ground transportation must be made through the cruise line operators; otherwise expenditures will not normally be reimbursed without prior written approval from a documented project approver.

2.2 Travel Authorization

Travel is a manageable expense and comes under the scrutiny of the project budget constraints as well as this policy. Each traveler is accountable to be aware of project guidelines and approval requirements and to follow them.

2.3 Reimbursement

FSU does not pay expenses for spouses/ partners on business trips, any exception to this policy must be approved in writing.

2.4 Exchange Rate

The exchange rate to be used for a personal credit card or cash transactions is the actual exchange rate paid, substantiated with an exchange receipt, an ATM receipt with corresponding exchange rate from the Wall Street Journal or any other similar tool such as OANDA Corporation. Reimbursement for items paid by credit card will be at the local currency rate indicated on the credit card statement.

2.5 Expense Invoices

All Supplier expenses must be reported within sixty (60) days of when the expenses were incurred.

Expense invoices submitted to FSU for payment must include the following information or they will be returned and not processed:

- a) Supplier Name
- b) Employee Name and Title,
- c) Project Name / Ship Name
- d) Dates of expense (Traveled to and from and individual dates)
- e) Copies of all receipts

Unusual circumstances or expenses should be accompanied with written authorization from one of the documented project approvers when possible. If circumstances prohibit prior approval or written authorization expense should be accompanied by a written explanation to facilitate the approval process.

Approval

Any exceptions must be approved in accordance with this policy by one of the documented project approvers and included with the final expenses invoice(s).

2.6 Paid Invoices or Receipts

Receipts are to be included with the invoice. Original receipts must be maintained by the Supplier in accordance with the terms of the contract/ agreement. Receipts are required for all expenses over **25 USD**. Receipts that have several different types of charges, such as hotel bills, must be broken down into each individual type of charge (e.g. room, tax, internet, meals, parking, and laundry). Contractors traveling in the EUROPEAN and ASIA regions, where a transaction includes VAT/GST, must obtain and submit a proper VAT/GST original receipt for all non-gratuity expenses. (NOTE: Credit Card receipts are not sufficient for VAT expenses).

All non-VAT/GST credit card receipts must bear the name of the employee requesting the reimbursement. The date on the receipt must be the same as the date the expense was reported on the expense report / invoice(s).

Receipts must include the following details:

- Date and place (merchant identification/name) expenditure was incurred.
- The company, name and title of all people who participated in the business discussion.
- The nature of the business discussion and/or the business reason for the expense or the nature of the business benefit to be derived as a result of the expense.
- For procurement expenses a description and quantity of each item purchased and total cost of the order

3. Expense Types

3.1 Entertainment

Entertainment expenses are not reimbursed by FSU. This includes but is not limited to: in-room movies, mini bar amenities, gift shop, in-flight movies, in-flight headsets, alcoholic beverages during travel (e.g., on airplanes, in airports/ train stations).

3.2 Meals

Business Meals

Meal allowances are intended to provide flexibility and simplicity while managing costs. This policy provides a “not-to-exceed” daily rate that allows for adjustment when meals are provided through other means. For example, when a lunch is provided at a meeting, the Employee must reduce his or her maximum allowance for that day to \$40 (\$60 less the \$20 allocated for lunch). This provides the flexibility for Contractors that decide to skip a meal and eat a hearty later meal while mitigating the risk for abuse.

Refer to Appendix A for Maximum Daily Meal Allowance.

Meals While Working Onboard

Contractors working onboard ships are expected to eat onboard. Meals eaten in ports will not be reimbursed unless eating off ship was required for a specific business purpose. This purpose should be noted on the receipt submitted for reimbursement.

3.3 Air Transportation

Contractors are expected to balance the shortest flight time and the lowest cost, while weighing the convenience of the Employee and the business being conducted. With low airfares as a priority.

Contractors are required to book their travel at least 14 days in advance to take advantage of savings. Exceptions require the prior written approval by one of the documented project approvers.

Class of Service Eligibility

All supplier travel is booked in coach/ economy class.

Optional Product Charges

Contractors may expense standard base baggage fees (excluding overweight, oversize, or additional pieces) and stand-by fees for same day travel, in lieu of purchasing a new ticket. Other optional fees including Internet access and seat assignments, charges for in-flight entertainment and beverages are not eligible for reimbursement.

3.4 Lodging

Appropriate room types are considered a “corporate standard” single room. Generally, 3 star properties are sought out for most Contractors.

Shipboard

All Contractors below VP are entitled to double occupancy in a crew cabin if one exists.

Hotel Charges

In room movies, mini bar amenities, gift shops, spa and other services will not be reimbursed.

3.5 Ground Transportation

Transportation Out of Town

The choice of transportation while on a project must be made based on the lowest cost alternative. The use of airport shuttles, super shuttle, light rail and other public transportation is encouraged, keeping the Contractors knowledge of the area and safety in mind at all times.

Taxis

A receipt must support all taxi fares claimed on the invoice. Taxi receipts must indicate destination and date of travel.

Appendix A

Maximum Daily Meal Allowance

| | | | |
|--|----------------|--------------------------------|----------------|
| All Other Cities: | | | |
| Maximum Daily Allowance: \$60 | | | |
| Meal Guidance: \$10, 20, 30 | | | |
| Gratuities are considered part of the meal allowance and must be considered by the employee. | | | |
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| Maximum Daily Allowance: \$75 | | Maximum Daily Allowance: \$115 | |
| Meal Guidance: \$10, 25, 40 | | Meal Guidance: \$25, 35, 55 | |
| Country | City/ State | Country | City |
| Argentina | Buenos Aires | Aruba | Aruba |
| Aruba | Oranjestad | Australia | Sydney |
| Australia | Adelaide | Austria | Wien |
| Australia | Darwin | Bahamas | Nassau |
| Australia | Fremantle | Brazil | Sao Paulo |
| Australia | Hobart | Canada | Calgary |
| Australia | Wagga Wagga | Canada | Quebec |
| Austria | Graz | Canada | Toronto |
| Austria | Neusiedl | China | Hong Kong |
| Austria | Salzburg | Finland | Helsinki |
| Austria | Vienna | Finland | Turku |
| Austria | Wels | France | Nice |
| Bahamas | Freeport | France | Paris |
| Barbados | Bridgetown | Germany | Berlin |
| Belgium | Brussel | Germany | Bremen |
| Brazil | Rio de Janeiro | Germany | Frankfurt/Main |
| Brazil | Santos | Germany | Papenburg |
| Canada | Halifax | Greece | Athens |
| Canada | Vancouver | India | New Delhi |
| Cayman Islands | Grand Cayman | Ireland | Dublin |
| China | Shanghai | Israel | Tel Aviv |
| Croatia | Split | Italy | Florence |
| Croatia | Zagreb | Italy | Genoa |
| Denmark | Copenhagen | Italy | Milan |

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|---------|-------------|--|-------------|-----------|
| Denmark | Gudbjerg | | Italy | Rome |
| Finland | Naantali | | Italy | Turin |
| Finland | Vantaa | | Italy | Venice |
| France | Cannes | | Netherlands | Amsterdam |
| France | La Baule | | Netherlands | Den Haag |
| France | Marseille | | Norway | Oslo |
| Germany | Bremerhaven | | Norway | Trondheim |

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|--------------|----------------|--|----------------|---------------|
| Germany | Hamburg | | Russia | Moscow |
| Greece | Mykonos | | Russia | St Petersburg |
| India | Bombay | | Spain | Barcelona |
| India | Mumbai | | Spain | Madrid |
| Indonesia | Balikpapan | | Sweden | Stockholm |
| Italy | Mestre | | Switzerland | Basel |
| Italy | Naples | | Switzerland | Zurich |
| Italy | Napoli | | United Kingdom | Belfast |
| Italy | Pisa | | United Kingdom | Bristol |
| Italy | Trieste | | United Kingdom | Crawley |
| Italy | Venezia | | United Kingdom | Edinburgh |
| Jamaica | Montego Bay | | United Kingdom | Egham |
| Mexico | Cancun | | United Kingdom | Horley |
| Netherlands | Groningen | | United Kingdom | Kensington |
| Netherlands | Hoofddorp | | United Kingdom | London |
| Netherlands | Rotterdam | | United Kingdom | Manchester |
| Netherlands | Schiphol | | United Kingdom | Weybridge |
| New Zealand | Auckland | | United Kingdom | Woking |
| New Zealand | Christchurch | | United States | Key West |
| Norway | Gardermoen | | | |
| Norway | Lysaker | | | |
| Norway | Sandvika | | | |
| Philipsburg | St Maarten | | | |
| Portugal | Lisbon | | | |
| Romania | Bucuresti | | | |
| Singapore | Singapore | | | |
| South Africa | Durban | | | |
| Spain | Benalmadena | | | |
| Spain | Benicarlo | | | |
| Spain | Mallorca | | | |
| Spain | Palma Mallorca | | | |

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|----------------------|------------|--|--|--|
| Spain | Segovia | | | |
| Spain | Tenerife | | | |
| St Kitts | Basseterre | | | |
| Sweden | Malmö | | | |
| United Arab Emirates | Dubai | | | |
| United Kingdom | Chertsey | | | |
| United Kingdom | Cobham | | | |
| United Kingdom | Guildford | | | |
| United Kingdom | Salisbury | | | |
| United Kingdom | Shepperton | | | |
| United Kingdom | Southall | | | |

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|----------------|-------------------|--|--|--|
| United Kingdom | West Drayton | | | |
| United States | Alyeska, AK | | | |
| United States | Talkeetna, AK | | | |
| United States | Mesa, AZ | | | |
| United States | Scottsdale, AZ | | | |
| United States | Carlsbad, CA | | | |
| United States | Irvine, CA | | | |
| United States | Los Angeles, CA | | | |
| United States | Milpitas, CA | | | |
| United States | Napa, CA | | | |
| United States | Newport Beach, CA | | | |
| United States | Palm Springs, CA | | | |
| United States | San Diego, CA | | | |
| United States | San Francisco, CA | | | |
| United States | San Pedro, CA | | | |
| United States | Santa Clara, CA | | | |
| United States | Santa Monica, CA | | | |
| United States | Santa Rosa, CA | | | |
| United States | Aspen, CO | | | |
| United States | Vail, CO | | | |
| United States | Bridgeport, CT | | | |
| United States | Danbury, CT | | | |
| United States | Aventura, FL | | | |
| United States | Coconut Grove, FL | | | |

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| United States | Palm Beach, FL | | | |
| United States | Hilo, HI | | | |
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| United States | Chicago, IL | | | |
| United States | Annapolis, MD | | | |
| United States | Linthicum, MD | | | |
| United States | Waldorf, MD | | | |
| United States | Boston, MA | | | |
| United States | Medford, MA | | | |
| United States | Minneapolis/St Paul Apt, MN | | | |
| United States | Billings, MT | | | |
| United States | Henderson, NV | | | |
| United States | Las Vegas, NV | | | |
| United States | East Brunswick, NJ | | | |
| United States | Newark, NJ | | | |
| United States | New York | | | |
| United States | Lake Oswego, OR | | | |
| United States | Philadelphia, PA | | | |
| United States | West Chester, PA | | | |
| United States | Beaumont, TX | | | |
| United States | Odessa, TX | | | |
| United States | Stowe, VT | | | |
| United States | Arlington, VA | | | |
| United States | Sterling, VA | | | |
| United States | Seattle, WA | | | |
| United States | Spokane, WA | | | |
| United States | Washington DC | | | |

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