

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.			
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

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			

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			
United States	Lahaina, HI			
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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