


# Travel & Expense Policy

01 November 2021

**To Millennium employees and contractors:**

Millennium Space Systems is a U.S. Government contractor and as such all employees and contractors must comply with the Federal Acquisition Regulations (FAR Part 31.205-46) pertaining to business travel and expenses. This Travel and Expense Policy lays out guidelines for compliance with the FAR and IRS regulations as well as Company-specific policies that must be followed by all employees and contractors to ensure cost-effective business practices. Thanks in advance for adherence to this Policy.

# 1 GENERAL INFORMATION

## 1.1 STATEMENT OF PURPOSE

The establishment of this policy by Millennium Space Systems (the "Company") provides guidelines to follow for Company travel and expenses. It is Company policy to reimburse employees for ordinary, necessary and reasonable travel expenses when directly connected with or pertaining to the transaction of Company business. ***All travel expenditures must conform to this Policy to qualify for reimbursement.***

## 1.2 SCOPE, EFFECTIVE DATE AND REVIEW

For the purpose of this Travel Policy, "employee" includes Millennium contractors.

This policy will be reviewed as required to ensure that the terms are current, fair and representative of relevant corporate and industry conditions. The Company reserves the right to change this policy at any time, without prior notice.

## 1.3 RESPONSIBILITIES AND ENFORCEMENT

The Company expects employees to use prudent business judgment regarding expenses covered by this Travel & Expense Policy. All travel and travel-related expenses must be approved by the employee's supervisor and/or project manager and be in compliance with FAR and IRS regulations. In the event of extraordinary expenses (with the exception of "emergency expenses"), such expenses must be pre-approved by the employee's supervisor and/or project manager and must be adequately explained on the expense report. Direct travel (associated with a specific project) must be approved by the project (or program) manager. Indirect travel must be approved by your functional supervisor.

Supervisors, directors and project managers with approval authority are responsible for assuring that all policies detailed herein have been adhered to prior to approving employee expense reports. Any deviations from this Policy must be explained on the employee's expense report with the approval of the supervisor and/or project manager noted to the accounting department. As a U.S. Government contractor, the Company is subject to audits by the Defense Contract Audit Agency (DCAA) and the Defense Contract Management Agency (DCMA).

When submitting expense reports to claim reimbursement, employees are expected to neither gain nor lose financially. After expense reports are approved by the employee's supervisor and/or project manager, they must be forwarded to the accounting department. Requests for reimbursement must be submitted no later than 30 days after the expense is incurred. Reimbursement will be received no later than 30 days after expense report receipt. However, if an issue arises as a result of improper or incomplete expense reporting (which could preclude reimbursement), the request will be held pending further discussion and resolution with the employee.

Employees submitting expenses that are not in compliance with this Policy risk delayed, partial or forfeited reimbursement. Cases of significant abuse will be investigated and may result in disciplinary action, up to and including employee termination.

The IRS tax code and DCAA requirements include certain guidelines on legitimate expenses that are allowable for tax

reporting purposes. These guidelines serve as basic policy guidelines for the Company's reimbursement of travel. Reference for allowable expenses for travel can also be found on the GSA Federal Travel Regulation (FTR) website at www.gsa.gov/federaltravelregulation.

Complete explanations and documentation must be present on expense reports to meet IRS and DCAA specifications for qualified business deductions (see *Documentation* and *Receipts* sections below).

## 1.4 DOCUMENTATION REQUIREMENTS

Employees are **required** to accurately and completely:

- Include necessary backup data and supporting receipts (see *Receipts* section below).
- Complete the required documentation for all expenses incurred, regardless of method of payment.
- Follow documentation requirements for Boeing PRO-6 and MSS02172-102-SOP, Business Courtesies and Gratuities Authorization, for all Business Courtesies.

## 1.5 BUSINESS TRAVEL AND EXPENSE RECEIPTS

The following are required:

- All employees must submit **itemized** receipts for expenses when a receipt is required by this Policy. Itemized receipts must include the form of payment and breakdown of subtotal, tax, and total (and/or gratuity if applicable).
- Receipts for hotel, airfare, ground transportation (car rentals, Uber, Taxis, etc.), and business courtesies are required regardless of amount. Any other single expense in excess of the U.S. Internal Revenue Service documentation threshold ($75, or international equivalent, or more) requires a detailed receipt, listing all items purchased, are to be submitted with the expense report.
- Credit card/bank statements are not acceptable as support for expenses seeking reimbursement.
- Lodging receipts must be a detailed hotel portfolio.
- All airfare (e-invoice that includes all itinerary changes) are required to be submitted. If airfare includes flight seat upgrades, cost of flight seat upgrade must be clearly shown and separated from the base airfare.
- Rental vehicle receipt must be the traveler's copy.
- 78963214Approvers must verify that receipts are submitted and that expenses are reasonable, appropriate and in accordance with this Policy.
- Per IRS regulations, employees are required to retain original copies of all receipts for a period of one year.

# 2 TRAVEL ARRANGEMENTS

## 2.1 OBTAINING TRAVEL AUTHORIZATION

Employees required to travel (any duration, any distance) must obtain pre-trip authorization from their supervisor and/or project manager. ***Pre-trip authorization must be obtained using the Travel Authorization (TA) form***, which can be found on Confluence. This form must be completed **before** travel is booked, including the signature of the employee's supervisor (indirect) and/or project manager (direct). Approved TA forms must be submitted with the employee's expense report for reimbursement.

## 2.2 RESERVATION PROCEDURES

Each traveler is responsible for coordinating his/her travel arrangements, obtaining confirmation numbers and ensuring proper payment is made. The Business Office administrative staff is available to help you book or coordinate travel if you so desire.

The preferred travel booking system is SAP Concur, https://www.concursolutions.com/. SAP Concur has many of the travel policy requirements and compliance built into the system. The SAP Concur booking system also has the backing of Boeing Travel, which has negotiated significant airfare, hotel, and car rental discounts. Contact the Business Office to request user access to the booking tool.

# 3 AIR TRAVEL

Employees are asked to choose the lowest-available airfare. These can be acquired by:

- Booking at least 14 days in advance of the trip.
- Being flexible in your travel plans. Alternate airlines, times and dates may be less expensive.

Employees who book airfare outside of the preferred SAP Concur system are required to provide three price comparisons with their expense report demonstrating the lowest-available airfare was selected. The lowest-available airfare does not need to be selected if the flight:

- Requires circuitous routing (e.g., more than one stop).
- Requires travel during unreasonable hours.
- Excessively prolongs travel.
- Results in increased cost that would offset transportation savings.
- Not reasonably adequate for physical or medical needs.
- Not reasonably available to meet mission (purpose/business) requirements.

The appropriate reason for not selecting the lowest-available airfare is to be included with the expense report.

When booking using SAP Concur, if an employee does not choose a low-cost flight and one is available to the destination within 60 minutes before/after their departure time, an out-of-policy screen will appear in the electronic travel booking system. (Flights considered in the review include those that connect - have one stop - or use alternate local airports.) The employee can continue to search for a low-cost alternative, or justify the higher fare by selecting the appropriate reason from a pull-down menu.

## 3.1 AIRLINE SELECTION FOR U.S. GOVERNMENT PROGRAMS

All employees who charge directly to U.S. government contracts that contain the Federal Acquisition Regulation (FAR) clause 52.247-63, "Preference for U.S. Flag Air Carriers," are required to comply with the Fly America Act.

For Questions Contact:

- Cost Policy for Fly America Act information.

- Your Contracts & Pricing Focal
- Federal Acquisition Regulation clause 52.247-63, "Preference for U.S.-Flag Air Carriers".

## 3.2 CLASS OF SERVICE

It is the Company's standard practice to select the lowest coach, or equivalent airfare offered during normal business hours. Any upgrades to business or first class are at the employee's own expense. Any deviation from this subsection must be approved prior to booking flight reservations. For flights longer than 3 hours and for red-eye flights, travelers may make "mini" upgrades within the coach/economy classification (such as Delta Comfort+, United Economy Plus, American Airlines Main Cabin Extra and the like). Please ensure airfare receipts meet the receipt requirements in section 1.5.

## 3.3 FLIGHT INSURANCE

Flight insurance premiums are not reimbursable.

## 3.4 AIRPORT PARKING

When parking at LAX employees should use The Parking Spot as Boeing has negotiated significant discounts with the parking garage company. Employees will use their Boeing badge to obtain the discount.

Reimbursement for short-term and long-term parking at airports is permitted. However, due to excessive cost, employees should use long-term parking if the trip is more than 3 days. The use of taxis, Uber, Lyft or airport limousine service should be considered whenever possible if less than parking and applicable mileage cost.

## 3.5 FREQUENT FLYER PROGRAMS

All air travel carrier selections, or other activities relating to Company-financed business travel, are to be justified and undertaken solely on business merits, with no regard for impact on frequent-flyer programs. Employees may retain frequent flyer program benefits, however, participation in these programs may not result in any increased cost to the Company. Further, participation in a frequent flyer program should not be prioritized so as to adversely impact meetings and planned itineraries, particularly if other employees, consultants, customers, subcontractors or business associates are planning to travel for the same activity. Employees are responsible for any tax implications that may arise as a result of using rewards programs for personal use.

Employees will not be reimbursed for:

- Frequent flyer/loyalty program benefits applied to business travel.
- Airline club fees.
- Frequent flyer multipliers (purchase of extra frequent flyer miles).
- Frequent flyer/loyalty program fees.

## 3.6 AIRLINE COMPENSATION

Employees may retain compensation only if the delay in travel does not result in:

- Any interruption to their work schedule.
- Additional costs to the company.

## 3.7 PAYMENT AND DOCUMENTATION

Air travel charges are to be billed to the employee and reported on his/her expense report for reimbursement. Original receipts of all charges are required documentation for reimbursement of air travel charges. Note: Use of company credit cards is not generally authorized for booking travel or for other travel-related expenses; any authorization of Company credit cards is on a case-by-case basis.

## 3.8 Air Travel Fees

Airlines have additional fees that can be charged to an employee while traveling; at the time of check-in or during the flight. Some of the charges are discretionary and non-reimbursable.

Employees will be reimbursed for:

- Expenses required for the trip such as baggage fees.
- In-flight internet for business use, with manager's approval.
- Baggage handling at airports and hotels, not including tips as this is included in the employees per diem.

Employees will not be reimbursed for:

- Lost baggage.
    - The employee should contact the airline regarding requirements for compensation and expense all related charges as personal.
- Expenses not required for the trip such as preferred boarding, in-flight movies, travel insurance, etc.

# 4 GROUND TRANSPORTATION

The most economical and practical mode of transportation should be used, whether it be a rental car, hotel shuttle, bus, subway, taxi (including ride-hailing services, such as Uber/Lyft) or train.

When it is necessary to rent a vehicle, the cost of the following is reimbursable:

- Vehicle rental
- Tolls
- Fuel
- Parking

Towing (for illegal parking or other traffic violations), parking tickets and any and all moving violations (e.g., speeding tickets or traffic camera, HOV and toll violations), are at the expense of the employee, and not the Company.

Employees must consider round trip vehicle rental for travel when driving is more cost-effective than airline or rail (or if they need to transport bulky materials).

When renting a vehicle not using the Boeing Avis/Budget contract, "Millennium Space Systems" should be listed on the rental agreement, not the traveler's name. Travelers should sign the rental agreement "Millennium Space Systems by [traveler's name], [traveler's title]."

## 4.1 CAR RENTALS

### 4.1.1 RENTAL CAR SIZE AND UPGRADE GUIDELINES

All rentals should be for intermediate-size cars or smaller, unless more than three people are traveling together or extenuating circumstances (e.g., medical, physical, etc.) dictate otherwise. Three or fewer people traveling together for the same business purpose must rent one car unless extenuating circumstances require additional vehicles. Employees may accept car rental upgrades only if there is no additional cost to the Company. Upgrade costs for GPS or other add-ons are NOT reimbursable.

### 4.1.2 RENTAL CAR INSURANCE

When renting cars domestically, employees must decline rental car insurance as Millennium maintains its own coverage. The cost of insurance in connection with the use of domestic rental cars is not reimbursable. If renting a car internationally, insurance should be purchased at the time of rental.

### 4.1.3 REPORTING ACCIDENTS IN RENTED CARS

If an employee has an accident in a rental car, he or she immediately should contact:

- The rental car firm.
- Local authorities (e.g. police) to file an accident report.
- The Business Office to inform Boeing Corporate Insurance if the accident involves bodily injury or property damage.

All accidents are to be reported to the Business Office.

### 4.1.4 DRIVER SAFETY

Safe driving practices must be observed at all times. All incidents of employees being cited for driving under the influence of alcohol and/or a controlled substance while operating a rental car on Company business must be reported to Human Resources and to Security for action. All costs and damages related to such incidents are the sole responsibility of the driver.

### 4.1.5 REFUELING

Employees using the Boeing Avis/Budget contract are NOT required to refuel the rental car as the cost of refueling the car is negotiated by Boeing.

Employees and consultants not using the Boeing Avis/Budget contract are expected to refuel cars prior to returning them to the rental company. This practice will save a significant amount of money (vs. the rental agency doing the refueling). If you anticipate you will be driving a significant amount of miles at your destination (e.g., you foresee using at least three-quarters of a tank of gas during your trip), consider the "fuel purchase option" offered by most car rental agencies in which the car is returned without refueling.

When receiving reimbursement for:

A. Rental car

- ONLY gas may be reimbursed

B. Privately owned vehicle (POV)

- Gas OR mileage may be reimbursed

### 4.1.6 CAR RENTAL RETURN

Because rental cars are charged by the day and sometimes also by the mile, the car may be rented the night before or returned the morning after the completion of the trip if it does not exceed the term of the rental. Unless there are extenuating circumstances, you should always return the rental car to the same location from which you rented it – this will avoid significant drop-off fees that rental car companies often charge.

### 4.1.7 PAYMENT AND DOCUMENTATION

Rental car charges are to be billed to the employee and reported on her/her expense report for reimbursement. The original receipt of charges and the TA form are required documentation for reimbursement of car rental charges.

## 4.2 OTHER TRANSPORTATION

### 4.2.1 TRAVEL TO/FROM AIRPORT AND RAIL TERMINALS

The most economical and practical mode of transportation should be used to and from terminals, such as:

- Buses, subways, rail, taxis (including ride-hailing services, such as Uber/Lyft).
- Hotel and airport shuttle services.
- Privately owned automobile.

Employees will be reimbursed for:

- Driving personal owned vehicle (POV) to/from the airport in excess of normal daily commute – Parking and mileage for one round trip will be reimbursed. Mileage is calculated for the distance (mileage/kilometrage) between home or work location to the airport, and back to their work location or home upon their return.
- Each round-trip, if being dropped off or picked up at the airport in order to avoid the cost of airport parking.

### 4.2.2 PERSONAL CAR

Use of a privately owned vehicle is allowed for business travel (75 miles or more (or international equivalent)) when the one-way driving distance will be 350 miles or less (or international equivalent) or if it is more practical or economical than airline travel, including use of time, en route meals, etc. It is the responsibility of the owner of a privately owned automobile being used for business to carry adequate insurance coverage for the owner's protection and for the protection of any passengers. Mileage expense form (found in Confluence) must be filled out and signed by program manager or supervisor.

If the driving mileage is more than 350 miles one-way, the employee must do the following:

- Discuss and obtain prior approval from manager.
- Consider rental car as an alternative to a privately owned vehicle.
- Document the detailed business justification for traveling by personally owned vehicle vs. flying.

The use of personal cars for business will be reimbursed at the standard rate set by the IRS (26 CFR 601.105) and the U.S. General Services Administration under the Privately OwnedVehicle Mileage Reimbursement Rates. The current mileage rates can be found at: http://www.gsa.gov/portal/content/100715. This mileage allowance covers all auto costs (e.g., gasoline, repairs, insurance, etc.) other than parking and tolls. Towing (for illegal parking or other traffic violations) and traffic tickets are expenses borne by the employee, and not by the Company.

Whenever an individual operates his/her own vehicle on Millennium business, he/she is exposed personally to potential liability in the event of an accident. Although Millennium is covered by insurance against liability, when an employee drives his/her own vehicle on business, it is not possible for Millennium to obtain insurance that will protect the individual employee against liability to others even though on Company business. Each individual must obtain his/her own insurance. Therefore, all employees using their personal automobiles for Company business must carry at least the state minimum liability insurance. Regardless of coverage, if an automobile accident should occur while on business, it should be reported as promptly as possible to the Business Office as well as the individual's own insurance company.

### 4.2.3 RIDE SHARING

Employees are encouraged to share rides if traveling to the same location.

### 4.2.4 TAXI AND OTHER LOCAL TRANSPORTATION

The cost of taxis and other hired transportation services (e.g., Uber/Lyft) to and from places of business, hotels or airports in connection with business activities is reimbursable. Use of hired transportation services is authorized only when more economical services (hotel vans, shuttles, etc.) are not available. When the cost of hired transportation services exceeds the cost of an available car rental, employees should opt for the car rental.

### 4.2.5 COMPANY-OWNED/-LEASED VEHICLES

Reimbursable expenses for Company-owned/-leased vehicles include gasoline, oil, antifreeze, maintenance, repairs, tires, washing, license plates, title registration fees, safety checks, tolls, parking and towing expenses in case of breakdown. Submit out-of-pocket expense receipts for these items as you would any direct out-of-pocket expenses. However, you must identify the Company vehicle clearly on your receipts by including the vehicle's license plate number or Millennium asset number. Do not have major maintenance performed immediately prior to disposition of a Company vehicle (new tires, etc.) except for safety reasons and with prior Company approval.

### 4.2.6 REPPORTING ACCIDENTS FOR PERSONAL AND COMPANY-OWNED/-LEASED VEHICLES

Employees must promptly report all accidents involving personal vehicles when used on Company business and all accidents involving Company vehicles regardless of use. For Company vehicles, accident reports must be filed in accordance with state and local law to the statutory authorities and also to the Company's insurance carrier per

corporate guidelines. A copy of the employee's report to the car rental agency or to the traveler's personal insurance company and the police accident report is sufficient for the Company's purposes. The Business Office will provide any additional forms necessary. (If you are involved in an accident with your privately owned vehicle, the cost involved for the repair or any claims are the responsibility of the traveler.)

The employee must also report accidents within 24 hours to his or her supervisor. Accidents will be investigated and documented and the Business Office will determine the requirements for further reports if necessary, including theft or vandalism.

### 4.2.7 PAYMENT AND DOCUMENTATION

To be reimbursed for use of a personal car for business, employees must provide on the expense report:

- Purpose of the trip
- Date and location
- Mileage expense form

To be reimbursed for taxi service, other hired transportation services or expenses from use of a Company-owned/-leased vehicle, employees must report the charges on an expense report per Policy guidelines (see *Receipts* section above).

# 5 LODGING

Employees are responsible for arranging their own lodging reservations for all business travel. The daily cost of lodging is a reimbursable expense when away from the normal workplace on Company business. Such cost includes only the single-occupancy room rate and applicable taxes.

Employees should use government lodging per diem rates for hotel accommodations whenever possible (see below for Meals and Incidental Expense per diem guidelines). These government per diem rates can be viewed online at http://www.gsa.gov/portal/category/100120. Taxes on domestic lodging are not included in the per diem rates. For international lodging expenses, taxes are included in the standardized per diem lodging rates.

A letter authorizing Millennium Space Systems employees to use government rates can be found on Confluence. Employees should carry a copy of the government rate authorization letter when on business travel. The minimum government or corporate rate should be requested at all hotels. Hotel cost over the established government per diem will be recorded as unallowable in Deltek Costpoint.

When booking using SAP Concur, Boeing Travel negotiates with hotels for discounted rates and value-added amenities; these are known as "preferred hotels." They are designated in the electronic travel booking system and also listed in the preferred hotel directory. Travelers should use a preferred hotel unless:

- Attending a seminar or conference held at a non-preferred hotel.
- There are no preferred hotels near the place of business.
- The rate for a non-preferred hotel is lower than the rate of a preferred hotel.
- No space is available at the preferred hotels in the area.
- There are safety concerns about the hotel location.

Hotel or lodging reservations from online marketplaces (examples include but are not limited to: Airbnb, Hostels, Bed and Breakfast accommodations, HomeAway, VRBO, FlipKey, etc.) are not permitted based on business security and safety risks. Deviations to this can be made if approved prior to booking by a Company executive (CEO/CFO).

## 5.1 ROOM TYPE

Single rooms should be requested at all hotels. For extended stays, employees should attempt to obtain accommodations on a weekly or monthly basis at reduced rates. Employees may accept room upgrades only if the upgrade is at no additional cost to the Company. Costs of upgrades are not reimbursable.

## 5.2 LODGING CANCELLATIONS AND NO-SHOWS

Employees are responsible for canceling their reservations if their plans are canceled or changed (unless there is an emergency situation). When canceling a reservation, always obtain and note:

- A cancellation confirmation number
- Date of cancellation
- Name of individual processing the cancellation

Employees are responsible for any no-show billings and any penalty charges assessed when an unused reservation is not canceled.

If an employee is required to check out earlier than stated on the reservation due to business requirements, any fee charged by the hotel for early check-out is reimbursable. The employee should consult with the hotel reservations desk to determine if a check-out fee is applicable.

### 5.3 HOTEL HEALTH AND FITNESS CENTER CHARGES

Fitness center and similar charges will NOT be reimbursed.

### 5.4 PAYMENT AND DOCUMENTATION

Lodging charges are to be billed to the employee and reported on their expense report for reimbursement. The original receipt of charges and the TA form are required documentation for reimbursement of lodging charges.

### 5.5 EMPLOYEE REIMBURSEMENT

Employees will be reimbursed for:

- Reasonable actual lodging costs.
- Parking a rental car at the hotel.

Employees will not be reimbursed for:

- Any cost defined as covered by the M&IE rate cannot be claimed as a separate expense.
    - Incidental Expenses that are a portion of the M&IE per diem and non-reimbursable items include: Fees, gratuities, and tips to porters, baggage carriers, bellhops, hotel maids, stewards or stewardesses and others on ships, hotel servants in foreign countries, laundry, dry-cleaning, and/or pressing of clothing.
- In-room movies.
- Hotel or lodging costs at their home location unless a business justification is submitted with the expense report.
- Hotel or lodging costs incurred by other businesses.
- Complimentary customer-provided lodging.
- Room upgrades including pool side rooms and special floors unless a business justification is submitted with the expense report.
- Donations to charity organizations that have not been confirmed through YourCause (like those added to hotel bills) are not reimbursable unless confirmed it is mandated by governmental law.

# 6 MEALS

## 6.1 EMPLOYEE MEALS WHILE ON TRAVEL STATUS

Employees are reimbursed a per diem rate for Meals and Incidental Expenses (M&IE) while on business travel status, which varies by city and is updated at http://www.gsa.gov/portal/category/100120. No documentation is needed to substantiate personal expenses. It will be in the employee's discretion on how the per diem is allocated between breakfast, lunch, dinner and incidentals.

Incidental expenses include fees, gratuities, and tips to porters, baggage carriers, bellhops, hotel maids, stewards or stewardesses and others on ships, hotel servants in foreign countries, laundry, dry-cleaning, and/or pressing of clothing. Amounts incurred inexcess of the per diem will be the obligation of the employee.

The government per diem rate for meals should be charged at 75% of the current per diem rate on the first and last day of travel. No per diem should be charged for local travel (less than 75 miles each way, calculated from the Millennium facility to the destination point).

## 6.2 BUSINESS MEALS TAKEN WITH OTHER EMPLOYEES

Employees may be reimbursed for business-related meals with other employees. The Meal Justification Form must be completed and attached the expense form. For employees who are on travel, the provided business meal must be deducted from the employees per diem for the meal.

## 6.3 DAY TRIP MEALS

IRS regulations do not allow deductible reimbursement of meals incurred on day trips away from the usual place of employment (i.e., not away from home overnight) and these meals are NOT reimbursable. In limited cases, it may be appropriate to reimburse for day trip meals if the employee incurs substantially higher-than-normal meal costs. These limited cases should be approved in advance, noted, and explained on the expense report.

## 6.4 NON-TRAVEL RELATED MEALS

Employees eating together at their normal place of employment may not charge the cost to Company expense unless the meal has a specific business purpose, contact Cost Policy for clarification. It may be appropriate for business reasons for an employee, generally director-level or above, to reward another employee, however, such recognition must be approved ***prior*** to incurring said expense. Contact Cost Policy for allowability classification of the meal. Meals, such as welcome lunches, celebrations, and etc., must be preapproved via a DoFun Jira task.

## 6.5 WORKING MEALS

When business needs require work-related discussions during an on-site meeting, greater than four hours, to continue through the normal mealtime, food and beverage can be provided and the expense report must document the nature of the business purpose. If the meal includes non-Millennium employees see Acceptance and Offer of Business Courtesies in section 9 below.

## 6.6 NON-TRAVEL TIPPING

Non-travel related gratuities paid for services provided (bell service, skycap service, valet parking, doormen, etc.) should be reasonable and appropriately documented. For reimbursement purposes, tips for meal service should be reported in the total costs for each meal. Employees will be reimbursed if the amount is reasonable, based on destination and service rendered. Excessive tips will not be reimbursed.

## 6.7 BUSINESS MEALS WITH CUSTOMERS

See Acceptance and Offer of Business Courtesies in section 9 below.

# 7 OTHER REIMBURSABLE EXPENSES

Telephone and Internet: Telephone and internet expenditures are fully reimbursable for business purposes and allowable for personal calls and/or internet access on a reasonable basis. If the cost of calls is unusually high, whether for business or for personal reasons, the traveler must explain the nature of the calls.

If there is a business requirement for travel, the Company will pay for the costs of obtaining a passport, passport photo and/or visa. If a receipt is not provided, retain and submit any supporting documentation for expense reimbursement. Ensure all Personally Identifiable Information is not visible on supporting documentation prior to uploading it to the travel expensing system.

Laundry, dry-cleaning, and/or pressing of clothing is covered by the M&IE rate cannot be claimed as a separate expense.

# 8 COMBINED BUSINESS AND PERSONAL TRIPS

An employee may decide to extend a business trip for personal reasons or bring family members on a business trip, however, any additional costs incurred due to the aforementioned are the sole responsibility of the employee. Such additional expenses include transportation, hotel accommodation, meals, travel expenses and any applicable taxes. Only business expenses will be reimbursed.

Non-employee travelers may share accommodations as long as there is no additional cost to Millennium Space Systems, however, costs above a single accommodation will be the responsibility of the employee. For example:

- Single accommodation including tax: $100.00
- Double accommodation including tax: $125.00
- Personal expenditures (per day): $25.00

The traveler is required to obtain a one-time airfare comparison in advance of the trip not during or after the trip has occurred. For questions how to document, contact Cost Policy.

# 9 ACCEPTANCE AND OFFER OF BUSINESS COURTESIES

All business courtesies given or received must be done so ethically in order to ensure compliance with applicable laws and regulations and to avoid the perception of impropriety and damaging the Company's reputation. All received business courtesies must comply with Boeing PRO-6 and MSS02172-102-SOP, Business Courtesies and Gratuities Authorization.

# 10 NON-REIMBURSABLE EXPENSES

The Company will NOT reimburse for the following expenses:

- Expenses without proper documentation including a TA form
- Credit card or travel & entertainment card annual membership or fees
- Excessive personal telephone calls
- Any items bought for personal use (including personal care items, magazines, airline headsets, etc.)
- Hotel and airplane movies, games and other discretionary charges
- Personal gifts
- Traffic and parking fines, towing, impound
- Alcoholic beverages, except in accordance with authorized business conference/entertainment expenses
- Mini-bars
- Child care and animal care services
- Any non-approved expenses

# ATTACHMENT A – COMPANY DESIGNATED CAR RENTAL AGENCIES

When car rental is necessary, take advantage of the corporate discount provided by the major car rental firms with which the Company has arrangements (currently Avis and Budget).

## AVIS

The Company is a member of Avis's Corporate Awards Program, which gives travelers access to special rates, deals and services. When making a reservation, use the Company's Avis Worldwide Discount (AWD) number, **S320522**, to take advantage of the program.

Employees have the opportunity to sign up for Avis's complimentary Preferred Service (www.avis.com/preferred), which allows travelers to save preferences, skip the counter and paperwork and other perks. Travelers can also make use of Avis's exclusive Corporate Awards website (www.avisawards.com) for access to special deals, travel information and services.

Employees are able to use the Avis contact when renting for personal use. The Avis Leisure code is in the US **S320590**, and Outside the US **S320591**

## BUDGET

The Company is a member of Budget's Business Program, which gives travelers access to special rates, deals and services. When making a reservation, use the Company's Budget Corporate Discount (BCD) number, **D574200**, to takeadvantage of the program.