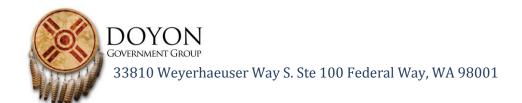
DGG Travel Policy



DGG Travel Policy

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Purpose

The purpose of this policy is to introduce and establish overall guidance for all facets of travel and business meal expense reimbursements. This includes travel authorization and approval, travel planning, as well as travel and business meal approval and reimbursement. The overall guidelines established within this policy are intended to comply with directives from the Internal Revenue Service (IRS), the Federal Acquisition Regulations (FAR), Federal Joint Travel Regulations (JTR), and the Doyon Limited Travel policies.

This policy also serves to clarify and communicate the company's position on reimbursement of cost for business related meals and entertainment as well as seminar and conference attendance and reimbursement. Business related meals and entertainment assist in meeting organizational goals but must be used productively and with efficiency of cost expenditure while maintaining a commitment to standards of business ethics as defined by the federal government, Doyon Limited, and Doyon Government Group (DGG).

Policy

All DGG and subsidiary employees (the Company), consultants, contractors, and outside representatives are responsible for controlling travel and entertainment expenses, and are expected to use good judgment and sound ethical business and legal standards while conducting and generating business on behalf of the Company and/or its customers or when requesting reimbursement from the Company. All business travel expenses must be *ordinary*, *necessary*, *and reasonable*. No employee on company travel shall benefit materially or monetarily from their company travel. Employees on company-paid Short Term Agreements (STA) may follow different policy outlined in each individual STA.

Responsibilities

Manager's Responsibility:

Company Managers should know the current travel and business policy and inform their departmental staff of Company policies and procedures. Managers shall enforce these policies through regular training and instruction to all current and newly hired employees. Managers shall set the "tone at the top" regarding their own travel arrangements and expenditures and overall enforcement of this policy.

Employee's Responsibility:

Notify the DGG Travel Department as early as possible of necessary travel arrangements. If you notify the travel coordinator of your travel plans fourteen (14) days or more in advance, your trip will, in most cases cost considerably less. Obtain the required travel approvals well in advance of travel, and submit expense documentation in line with the established accounting procedures. Submit individual travel authorization and expense reports as outlined in this policy on a timely basis (within 7 days of travel) and in accordance with the documentation requirements.

General Guidelines

A critical balance must be sought when requesting authorization for business travel. This balance is the Company's need for cost effectiveness in the travel arrangements and the employee's need for quality services and support. Employee travel should be via the lowest cost alternative, consistent with good business practices and with an eye to productivity while traveling. Neither luxury, nor sub-standard modes of transportation and accommodations should be used.

Employee travel and the expenses associated with travel will be authorized only in circumstances which are clearly consistent with the mission, approved strategic plan, and actual contract work being performed by the Company. It will be the responsibility of each designated Manager to ensure that all employee travel meets this overall objective and that reimbursement is made only for actual, reasonable business expenses in connection with authorized travel as defined in this document. *In order to maintain control over expenditures, any expense submitted which does not comply with the guidelines of this procedure will not be reimbursed, unless accompanied by a valid exception.* The traveler shall obtain, without exception, prior approval from the management personnel for any travel expenditure not specifically addressed in this policy. Expense reports must be submitted in a timely manner to ensure reimbursement and accurate cost accounting.

The traveler shall exercise sound judgment when incurring expenses on official business. Only certain business related expenses will be reimbursed, as documented in this Policy.

To be considered a valid business expense, the expense must be:

- Ordinary and necessary
- Reasonable in amount
- Incurred for a valid business purpose

These expenses must also be supported by adequate documentation, in addition to prior approval. Adequate documentation incorporates the "who, what, when, where and why" of the business expense. In the event expenses are not considered valid business expenses, the supervisor will require the employee to reimburse the company for expenses paid with a corporate credit card, or such expenses will be considered personal compensation and will be reported as such on the employee's W-2 earnings statement with applicable personal tax deductions (without a gross up of income tax due).

Travel advances shall not be provided, except in special circumstances approved by the employee's direct supervisor and/or the Sr. Project Manager or Area Manager. If the employee does not have a corporate credit card to charge travel expenses for their upcoming trip, the company will provide a method to pay for upcoming airline tickets and/or reserve lodging on the corporate card.

The traveler shall be reimbursed for expenses incurred for business travel in privately owned vehicles, with adequate documentation, and in commercial carriers. Typically, reimbursements shall cover all lodging costs and meals at the rates published in the Government per diem tables, unless the traveler has obtained prior approval from his or her supervisor to exceed those rates.

The traveler's direct supervisor is responsible for accurately reviewing and approving travel expense reports, supporting documentation and ensuring that the traveler is familiar with the planning, approval, and documentation requirements of this policy.

Travel Arrangements

The justification for business travel shall be carefully evaluated. Options such as videoconferencing, teleconferencing, or other forms of communication shall be considered before initiating travel arrangements. Although face to face meetings are important, DGG supports a variety of communication protocols and technology mediums that allow for effective communication without face to face meetings. When travel is authorized, certain technology applications can aid the traveler to be more productive and save money while traveling, e.g. use of travel alerts from airlines, etc. Additionally, many hotels offer several amenities that can have a great effort on productivity while traveling.

Submitting Travel Request Forms

All travelers (excluding Company Management) must submit a Travel Request Form at least 7 days in advance of travel, if feasible. The forms must have the employee's full name (as it appears on their driver's license), date of birth, travel information and contact number. It must also include the business purpose of the trip, and the appropriate job cost coding. This form must be submitted to the travel department prior to booking the actual travel.

A link to the online Travel Request (TR) is located on the DGG Employee Portal.

Business travel shall be authorized in advance by the traveler's direct supervisor or Sr. Project Manager, Area Manager or other designated authority. A Travel Request Form shall be completed and submitted to the travel department. Proper approval is required prior to travel for any business related travel, otherwise the cost of the trip may not be covered by the Company.

Travel Insurance

All rental car insurance should be declined by the traveler. DGG's insurance provides adequate insurance coverage for employees on authorized Company travel with the exception of international car rentals.

Only when traveling <u>internationally</u>, employees should accept additional rental car insurance.

Other non-reimbursable items:

- Domestic travel insurance shall not be reimbursed.
- If the traveler keeps the rental car for personal use, no Company-covered insurance will be extended to the employee for the additional personal use of the rental vehicles.
- Lost or Stolen Personal Property Personal property lost or stolen while the traveler is on a business trip is the responsibility of the traveler. There shall be no Company reimbursement for lost or stolen personal property; therefore, employees must display due care when traveling with personal items.
- Parking or moving violations no reimbursement shall be made for parking or moving violations.

Air Travel

All travel and airline tickets must be purchased through the travel department using the Company Corporate Credit Card. At no time shall travel fares be booked using personal forms of payment unless approval is obtained by company management. If this is done without prior approval, you may not be reimbursed.

Class of Service

All air travel shall be coach or economy class except in the circumstances specified below.

Travelers are asked to purchase the lowest available airfare based on refundable versus nonrefundable ticket price and restriction comparisons. Any fare or seat upgrades, except those listed below, are the financial responsibility of the traveler and shall not be reimbursed if approval is not obtained in advance.

Seat upgrades, Business class, or First class if business class is not offered, is authorized only when at least one of the following conditions applies AND prior approval is obtained from company management:

- Flight time for an individual segment exceeds 6.0 hours, or when the combined flight segments plus layover(s) exceed 10 hours.
- Employees use personal upgrades and the cost of upgrading does not mean changing a lower approved fare.
- The traveler is required to arrive at a particular time when coach class is completely sold out, either on the intended flight or alternative flights. Documentation from the travel department is required to substantiate the condition.
- The traveler has physical conditions or disability dictates. Documentation in the form of a letter from the traveler's physician is required to document the current condition.

Excess Baggage

Employees will be reimbursed for charges relating to the first two business-related checked bags.

Employees will be reimbursed for excess baggage charges only in the following circumstances:

- When traveling with heavy, bulky materials or equipment necessary for business
- The excess baggage consists of Company property
- When traveling for more than 7 days

Flights and Airports

Travelers shall consider the most economical flight(s) available at the required time of departure at airports that are within a reasonable distance (no more than one hour driving distance) from their desired departure location. In some cases, this may require the traveler to book a flight at an airport that is not as convenient as one the traveler might normally use for personal travel.

Advance and Discounted Airfares

The traveler shall be required to use the lowest class available airfare. The traveler should book flights sufficiently in advance to take advantage of airline discounts whenever possible.

Ticket Cancellations and Refunds

If the ticket purchased is nonrefundable, every attempt shall be made to use this ticket toward future airline ticket purchases whenever applicable. Most nonrefundable tickets can be used toward a new purchase for up to one year from the original issue date. Nonrefundable tickets are nontransferable. It shall be the responsibility of the traveler to ensure nonrefundable tickets are reused.

Automobiles and Other Surface Transportation

Automobile Rentals

If driving has been deemed the most cost-effective method of travel, the employee can choose to drive a personal vehicle or rent a vehicle. Rental vehicles shall be requested by Travel Request (TR) through the travel department, and rented from the established DGG provider.

Mid/Intermediate-size (class C) or smaller cars will be authorized. If a larger size automobile is rented, the additional cost over and above the class C rate will not be reimbursed unless prior approval is provided by the employee's supervisor to accommodate additional personnel, accommodate excess company-related baggage, or when required by medical condition.

No reimbursement shall be made for Loss Damage Waiver and/or Collision Damage coverage.

<u>Do not accept liability insurance by the rental company regardless of the rental company used.</u> In the event of any accident in a rented automobile while on Company business, the traveler shall file claim paperwork through Human Resources, per the Employee Handbook.

Whenever possible, the traveler shall refuel before returning a rented automobile to avoid rental companies' premiums over the local market price for gasoline unless it is more cost efficient to do otherwise.

Personal Car Used for Company Business

Personal vehicles may be used with prior approval from the Project Manager or supervisor when anticipated hours of work and transportation conditions make such a mode of transportation more efficient.

It is the personal responsibility of the owner of a vehicle being used for business to carry adequate insurance coverage for his/her protection and for the protection of any passengers.

Reimbursement for Personal Automobile Usage

Travelers shall be reimbursed at the current IRS rate for U.S. travel, unless otherwise directed by the contract. *Employees shall not be allowed reimbursement via general fuel charges for personal vehicle usage and a mileage allowance is the only approved reimbursement method.* The allowance shall be based upon mileage shown by odometer readings for local trips of up to 200 miles round trip. The traveler shall be responsible for accurately recording all mileage distances traveled. For trips of more than 200 miles, allowances shall be based on generally published mileage tables for a direct route. The mileage allowance shall cover all automobile costs, including insurance and depreciation, plus the costs of gasoline, oil, repairs, and maintenance incurred during the trip. Employees will not receive a direct mileage reimbursement if they are receiving an agreed upon per diem rate or if they are using a Company furnished vehicle.

Daily commuting mileage and tolls to and from assigned work location(s) shall not be reimbursed. Additional miscellaneous expenses such as car washes or oil changes for personal vehicle use shall not be allowed.

Rail Travel

Domestic rail travel shall be in coach class.

Other Surface Transportation and Parking

Use of taxis or other public transportation shall be considered when determining the most economical means of transportation. Those means usually cover frequently traveled routes, such as transportation to the local airport, city center, or client site. Travelers are expected to avoid long-term parking costs at airports unless the parking cost is lower than available means of transportation to and from the airport.

Hotels, Meals, and Living Expenses

Hotels

The traveler shall be reimbursed for actual lodging expenses up to the maximum lodging amount shown in the Federal Joint Travel Regulation (JTR). Please note that this amount does not include taxes, which are reimbursed separately.

A link to GSA Per Diem Rates is located on the DGG Employee Portal

If the hotel location is not listed by city or county use "All places not listed." When available hotels exceed the per diem amount authorized by the JTR for the locality, appropriate approval for the excess cost shall be obtained from the Project Manager prior to traveling and shall be documented on the expense report.

To use the actual rate, documentation shall be provided and approved prior to travel. The actual rate is authorized when one of the following occurs:

- Costs have escalated because of special events (for example, sporting events, conventions, natural disasters)
- Lodging expenses within prescribed allowances cannot be obtained nearby,
- Costs to commute to/from the nearby location consume most or all of the savings achieved from occupying less expensive lodging or
- Due to project requirements

The maximum amount the traveler may be reimbursed with prior approval from company management under actual expenses is limited to 300 percent (rounded to the next higher dollar) of the applicable maximum per diem rate. There is no authority to exceed this ceiling.

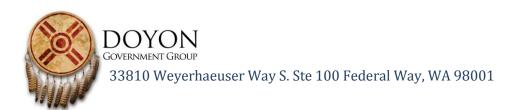
Guaranteed Room Reservations

The traveler shall be responsible for canceling hotel rooms within hotel cancellation deadlines. Failure to cancel a guaranteed reservation will result in a charge for one night's lodging. This charge is not reimbursable unless prior authorization is obtained.

Meals and Incidental Living Expenses

The following specific incidental expenses shall be reimbursed: (Itemized receipts for all expenses are required and reimbursement shall not occur without these itemized receipts)

- Air freight for business purposes
- Business-related phone/fax services and Internet connections
- Laundry (valet) service on trips lasting more than four (4) nights
- Overnight delivery/postage for legitimate business purposes
- Reasonable tips (up to 20% max)
- Seminar fees



- Taxis, tolls, parking expenses and gasoline for legitimate business purposes
- Telephone calls business: Calls must be clearly marked as business related
- Telephone calls personal: Employees will be allowed one safe arrival call, one departure call and one change of plans call, each not to exceed \$5 domestic and \$10 international
- Tolls, parking, and taxi

Specific expenses that are not reimbursable:

- Airline club membership dues
- Alcohol
- Baby-sitting
- Barbers and hairdressers
- Clothing
- Country club dues
- Family travel expenses
- Fees for any credit or charge cards
- Golf fees unless company sponsored
- Health Club facilities, saunas, or massages
- Lost baggage
- Magazines, books, and newspapers
- Mini bar refreshments
- Movies including in-flight and hotel in-house movies
- "No show" charges for hotels not cancelled within cancellation guidelines
- Optional travel or baggage insurance
- Personal accident insurance
- Personal car washes
- Personal entertainment i.e. show or theater tickets
- Personal toiletries, grooming items
- Pet boarding or pet airline transport charges
- Pet care
- Shoe shines
- Souvenirs/personal gifts
- Tobacco products
- Traffic, toll or parking violations/fines

Annual Leave or PTO in Conjunction with Travel

Annual leave, PTO and holiday time shall be allowed in conjunction with planned travel when such leave/PTO does not increase the cost to the customer or to the Company.

Under no circumstances shall costs during annual leave or PTO periods be reimbursed by the Government or the Company. Such costs are both unallowable and non-reimbursable.

Hotel charges and incurred meal costs are not reimbursable for days charged as annual leave, PTO, or holiday time.

Spousal Travel

The travel expenses of spouses or dependents accompanying employees on business trips shall not be reimbursed unless prior approval of Executive Management is obtained. The cost of the spousal or dependent travel is considered miscellaneous Income to the employee and will be included on the employee's W-2 earnings statement subject to all applicable taxes.

Expense Reporting and Reimbursement

Travel Expense Reporting

Following the completion of approved business travel, and provided the employee did not use a company-provided credit card, the traveler shall complete and submit an Employee Reimbursement Report within 7 business days of completion of travel. Failure to submit accurate and complete expense reports promptly may result in less than full reimbursement for travel expenses and may include suspension or cancellation of travel and/or charge privileges.

Expense reports shall be reviewed, closely scrutinized and approved by the traveler's supervisor. Supervisors are responsible for determining whether expenses are ordinary, necessary, and reasonable. Any expenses that are not ordinary, necessary, and reasonable must be removed from the expense report. Significant reviews will be made to determine the business outcomes emanating from the business travel.

Expense Reports are to be submitted to the Accounting department for employee miscellaneous income processing. Employee is responsible to reimburse the company if a company credit card was used for any charge on their personal reimbursement report.

Completed, approved expense reports with required documentation shall be submitted to the Accounts Payable Department for payment. Payment shall be made within 7 calendar days of receipt at the Accounts Payable Department.

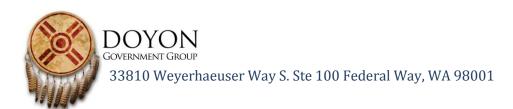
Documentation Requirements

A copy of the approved DGG Employee Reimbursement Form is included as Exhibit B

Expense reports shall be supported by itemized receipts for air/rail, hotel, auto rental, meals, and all other items. To be reimbursed, travelers must submit the following documentation:

Air/Rail: Passenger receipt showing proof of payment.

Hotel: Hotel statement in a daily, detailed format plus charge/credit card receipt or other proof of payment; telephone charges must be clearly marked as business or personal. Meals must be marked as



business meals or individual meals not covered by the Per Diem rate. Movies or personal incidentals charged to the room will not be reimbursed.

Auto Rental: Charge/credit card or other proof of payment.

Business Meals (non-per diem, including customers, partners, etc.): If the business meal expense is to be paid by the Company, the most senior DGG or DGG entity employee in attendance (at the Company sponsored business meal) must ALWAYS pay for the business meal and must be responsible for all business meal receipts. In addition to the payment receipt, detailed itemized receipts must be provided for all business meals. Additionally, all personnel attending the business meal must be listed, with the name of the company and position for each attendee. A description of the business purpose of the meal, including a summary of the discussion must be provided. All items purchased as part of the meal that are intended for reimbursement must be submitted with the expense report.

All receipts shall be taped to an 8 % " x 11" sheet unless the receipt itself is 8 %" x 11". All required receipts shall be submitted with the completed Expense Report. If any receipts are missing, the traveler must complete a Missing Receipt Form with the Expense Report stating a description of the expense(s), the expense date(s), and the amount(s). Incorrect or incomplete expense reports will be returned to the employee for correction/completion. The purpose of any expense must be clearly and adequately documented on the Expense Report.

For expenses paid with a corporate credit card: a copy of the expense summary from the Bank of America (BoA) Works system must be included with individual receipts. These reports and receipts are only required to be submitted monthly, no later than the 10th of every new month.

Guidelines for Tips and Gratuities

Tipping a porter, bellman, or waiter should be based on the quality of the service rendered and be confined to reasonable limits. The company will reimburse reasonable gratuities of 15%, and at times up to 20%, for exceptional service to the Company. Lavish or unreasonable gratuities will not be allowed or reimbursed. The employee may be asked to reimburse the Company if the tip lavish or extravagant and was paid for on the Corporate Card.

Entertainment and Conference Reporting

Additional business meal and entertainment reimbursements, outside of normal travel and business meal expenses, are only authorized for those employees of the Company who fall within the top tier of executive leadership of the Company. Generally, these personnel have responsibility for overall management of the Company and the achievement of specific strategic goals. The above management personnel have fiduciary responsibilities to the Company and may delegate this authority to only those individuals given the responsibility, by the nature of their job function, to strategically drive the business development and operational goals through new customer generation and/or in the preservation of existing customer relationships.

Approval to commit the company to these entertainment and additional business development expenses, outside the above mentioned parameters, may only be authorized by a member of the Company executive management or authorized representative of Doyon Limited.

As a member of an organization which emphasizes the value of ethics and integrity, each employee must pledge to uphold the Company's reputation in keeping compliant with all applicable federal laws regulating procurement with the U.S. Government. As a component of our Company's standardization in compliance, employees are prohibited from offering or providing, or being perceived to offer or provide, entertainment to government officials or employees and employees of government contractors or subcontractors. Employees finding themselves in a position to question the appropriateness of their actions, in providing entertainment to any individual, must seek the advice of the Company's Contracts and Compliance department and/or the Company's legal counsel, prior to taking any action. Employees should refer to the Company's Code of Business Ethics and Conduct for additional detail about contacting the Compliance department.

Entertainment and conference expenses shall be supported by appropriate documentation (receipt, agenda, business purpose, and list of attendees with affiliation) as required by the JTR.

On those occasions where, in the interest of business, facilitation of a meal and/or some form of entertainment is required, the Company will cover costs by allowing for the reimbursement of business meals or entertainment as they relate to fair and lawful expenses that are solely in pursuit of profitability for the Company. The Company expressly forbids any business meal or entertainment event sponsored by, or with the knowledge of, an employee that is, or is perceived to be, with the intent of gaining influence in procurement of a government contract.

Reasonableness: Employees are to use sound judgment in determining what qualifies as a sensible or not excessive expenditure for entertainment, whether it is in the extent or the disposition of cost.

Risk Management

To the maximum extent possible, follow the guidelines below to protect the Company from serious disruption of continuity as a result of a major calamity:

- No more than two Corporate Officers should travel on the same conveyance.
- No more than two immediate subordinates should travel with each Company officer on the same conveyance.
- No more than 10 of the organization's employees should travel together on the same conveyance

Important Definitions Associated with Government Travel

Defense Contract Audit Agency - DCAA - The DCAA is the audit agency of the Defense Department. All Costs incurred by Doyon Government Group and its subsidiaries are subject to audit by the DCAA.

Cost Accounting Standards - CAS - The CAS contains various accounting standards that were designed to provide uniformity and consistency in the measurement, assignment, and allocation of costs to government contracts.

Fly America Act - An Act instituted by the United States Government requiring that all travelers flying on government business, funded by the US government, must travel on a US flag carrier to the farthest possible point; regardless if a non-US carrier can be confirmed for a lower price.

Federal Travel Regulations - FTR - These regulations implements statutory requirements for travel for those authorized to travel with Federal funds. They are guidelines for the incurrence of travel costs for federal employees and defense contractors in the contiguous 48 United States as prescribed by the General Services Administration.

Joint Travel Regulations – JTR - Guidelines for the incurrence of travel costs for federal employees and defense contractors outside the contiguous 48 United States as prescribed by the Department of Defense.

Per Diem Allowance – A daily payment in lieu of reimbursement for actual expenses for meals, lodging and incidental expenses. JTR guides the per diem rate based on geographic area.

Direct Travel – Travel costs directly attributable to a specific contract and for specific contract performance.

Indirect Travel – Travel costs incurred in the normal course of overall administration of the business.

Unallowable costs – Any costs, which under the provisions of any pertinent law, regulation or contract, cannot be included in prices, cost-reimbursements, or settlements under a U.S. Government contract to which it is allocable or which the contractor voluntarily excludes from claims to the U.S Government.

TRAVEL POLICY AKNOWLEDGEMENT FORM

COMPANY INFORMATION						
Employee Name (Print):						
Date provided Travel Policy:						
Your Position:						
My signature below indicates I have been provided the DGG Travel Policy. Additionally, I will within 72 hours from receipt of the travel policy, read the policy and follow up with my supervisor if I have any questions or concerns to ensure full compliance and understanding of the policy.						



Exhibit B: DGG Employee Reimbursement Form

A link to the DGG Employee Reimbursement Form is located on the DGG Employee Portal

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*Please attach all receipts to document expenditures												
Employee:			1	Dept.		Date:						
Company E	Expenses Reimbur	rsable to employee:										
			Explanation			GL01	GL02	GL03	GL04	GL05		
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Signature o	f Employee:				Date:		1	1	1	1		
Signature of Approval:			Date:	Total Empl	loyee Reimburseme	ent:			\$0.00			
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