

ABM INDUSTRIES INCORPORATED
EMPLOYEE TRAVEL POLICY
as amended January 5, 2016

SUMMARY

This is a best in class policy that is based on benchmarks of firms in our sector. This Policy sets forth: (1) the requirements for reimbursement of business related expenses incurred by employees of ABM Industries Incorporated and its subsidiaries (the “Company”) while on Company business; and (2) the Company’s travel policies. This Policy excludes entertaining customers which is covered in the Gift and Entertainment Policy. Travel does not include commuting between home and the usual place of employment.

PURPOSE

This Policy is intended to ensure that the use of Company resources for travel expenses is in accordance with the type and amount of expenditures supported by the Board and management. Travel should be undertaken only when there is not a satisfactory alternative (correspondence, telephone, etc.) and when the benefits justify the cost. WEB/Video conferencing should be used at all locations where equipment and the nature of the meeting allows.

This Policy is intended to provide the Company employees with requirements for the reimbursement of business expenses, to improve control and to minimize cost of travel expenses incurred on Company business.

This Policy is intended to enable the Company to conform to Securities and Exchange Commission and Internal Revenue Service reporting requirements and to enable the Company to realize the maximum deduction of travel and meal expenses for income tax purposes.

COMPLIANCE

This Policy applies to ABM Industries Incorporated and its employees. All ABM subsidiaries may either adopt this Policy or adopt a similar travel policy that cannot be less restrictive than this Policy, in which equivalent operational titles replace the corporate approval levels set forth in this Policy (see chart below in “Definitions” Section). Subsidiaries electing to adopt a policy other than this Policy must have that policy approved by the President of the subsidiary and must submit a copy of the policy to the ABM Corporate Controller, the Legal Department, Internal Audit and the Shared Services Center. Senior management of each entity is responsible for enforcing compliance with these policies or those policies adopted and approved by their respective subsidiary. In addition, all employees are responsible for compliance with these policies or the policies adopted by their respective subsidiary. References to ABM refer to ABM Industries Incorporated. References to the Company in this Policy refer to ABM Industries Incorporated and any adopting subsidiary.

AMENDMENT CONTROL

This document has been approved by the ABM Board of Directors (“Board”), and any amendments to this Policy are to be approved by the Board.

DEVIATIONS

At times, circumstances may arise that cause deviations from this Policy. When possible, deviations should be approved in advance. They must be documented with clear explanations and submitted with the expense report. In general, deviations must be approved by an employee who is at least one level higher than the employee who will approve the expense report (see Section 7) except for specific deviations as outlined in the Policy that must be approved by an ABM Executive Vice President or the CEO. Deviations by an ABM Industries Incorporated officer must be approved by the ABM Chief Accounting Officer and for executive officers, must be approved by the ABM Chief Financial Officer (“CFO”). The CEO must approve any deviation sought by the CFO. Evidence of approval must be submitted during the expense report approval process.

DEFINITIONS

For purposes of the approval levels set forth in this Policy, the following terms have the meaning set forth below:

Travel Tiers	Positions & Titles
Tier 1	ABMI President and Chief Executive Officer
Tier 2	ABMI Executive Vice President Section 16 Officers
Tier 3	ABMI Senior Vice President EVP – Industry Groups and Business Lines Senior Vice President A – Industry Groups and Business Lines
Tier 4	ABMI Vice President Senior Vice President B – Industry Groups and Business Lines
Tier 5	ABMI Senior Director ABMI Assistant General Counsel Vice President – Industry Groups and Business Lines
Tier 6	All Other Titles

Table of Contents

Section and Title	Page
1. Scope	4
2. Safety and Risk Management	4
3. Related Policies	4
4. Reference Documents	4
5. Responsibility	4
6. Allowable Business Expenses	5
A. Air Travel	5
B. Lodging	7
C. Spousal Travel and Dependent Expenses	9
D. Extended Stay	9
E. Car Rental	9
F. Use of Employee's Personal Auto	10
G. Uber, Lyft, Taxi and Other Local Transportation	11
H. Travel Meals	11
I. Per-Diem Payments	12
J. Business Meals	12
K. Publications	13
L. No Expense Substitutions	13
M. Pre-Approval Requirements	13
N. Frequent Flyer Miles and Inconvenience Payments	13
O. Reimbursement for Airline Clubs	13
P. Reimbursement for Other Clubs	13
7. Expense Report Approvals	14
8. Accounting Responsibility	14
9. Expense Reporting	14
10. Relocation Expenses	16
11. Expenses Not Paid by the Company	16
12. Miscellaneous	16
13. Policy Compliance	17

1. SCOPE

The requirements of this Policy apply to all ABM employees and employees of all subsidiaries.

2. SAFETY AND RISK MANAGEMENT

When traveling on Company business employees are expected to use good judgment and act responsibly in selecting appropriate activities, obeying safety rules, and monitoring risks associated with such activities. In addition, the Company has adopted specific rules with respect to air travel restrictions:

- Major Airlines. Employees shall only fly on major commercial airlines or their regional connections.
- Private Aircraft. The lease or charter or any other use of private aircraft in connection with Company business is prohibited without approval of the CEO, and, with respect to the CEO, the Chairman of the Board.
- Advance Approvals. The CEO and any two Tier 2 employees shall not fly on the same aircraft without the prior approval of the Board. Four or more Tier 2 Officers shall not fly on the same aircraft without the prior approval of the Board.

3. RELATED POLICIES

ABM's *Code of Conduct*, *Gift & Entertainment Policy*, and *Anti-Corruption and Anti-Bribery Policy* contain provisions that impact the giving of gifts, business entertaining, gratuities and business courtesies and should be consulted for guidance in those areas.

4. REFERENCE DOCUMENTS

- Expense Report Form (either electronically through the Company cCard or through a manual expense report form)
- cCard Agreement

5. RESPONSIBILITY

A. Company

The Company will pay all reasonable expenses, allowed under the Policy, that are incurred by the employee in conducting Company business. It is expected that employees traveling on Company business will do so in reasonable comfort and at reasonable cost subject to the restrictions outlined in this Policy. For purpose of this Policy, reference to the cCard in this document refers to the cCard Program. For those employees who participate in the Company cCard Program, all expenses are to be paid with the cCard unless use of cCard is impractical (e.g. cash tips). For those employees who do not participate in the Company cCard Program, expense reimbursements and travel advances are to be paid using the Company's authorized disbursements process through the Shared Services Center or for subsidiaries without access to these processes, their Regional Accounting Center (no such disbursements are to be made out of petty cash accounts).

B. Employee Responsibility

- 1) Employees are expected to, where possible and effective, conduct internal meetings using audio and video conferencing. Travel which does not involve external customer meetings should be minimized whenever possible. The purpose of all travel should be clearly documented in the expense description portion of an employee's expense report.
- 2) Employees are expected to use good judgment and act responsibly in incurring expenses. Unreasonable expenses may subject the employee to discipline, up to and including termination, or may result in non-reimbursement and/or repayment by the employee.
- 3) Each employee incurring business expenses is responsible for submitting reimbursement requests in a timely manner in accordance with Section 9 of this Policy.
- 4) Each employee is required to report his/her expenses honestly and accurately. Overstating expenses, altering receipts, claiming expenses not actually incurred or other types of fraud or misappropriation of funds will subject the employee to disciplinary action up to and including termination.
- 5) As more thoroughly described in Section 7 of this Policy, the primary designated supervisor approving the expense report is accountable for validating the expenditures and the report's compliance with this Policy. Any Supervisor or Manager who fails to reasonably and properly validate the expenditures and the report's compliance with this Policy, is subject to disciplinary action up to and including termination of employment.

6. **ALLOWABLE BUSINESS EXPENSES**

A. Air Travel

All travelers are expected to travel at the lowest reasonable cost. Frequent Flyer Programs or the availability of free or low-cost upgrades do not qualify as a valid reason to pass up a lower fare. Employees are encouraged to consider alternative airports when the extra time and distance are not unduly burdensome. Employees are not required to utilize multi-leg flights when direct flights are available.

- 1) Use of Travel Agency. All Company employees must use an ABM authorized Corporate Travel Agency for all air arrangements.
- 2) Class of Service. The standard class of service for domestic air travel is Coach/Economy class and Premium Economy for international travel. Upgrade coupons will not be reimbursed for employees other than those authorized to purchase the next level of service available. The following employees may purchase tickets for the next level of service available:
 - a) Tier 2 employees or above.
 - b) Subject to c) below, on direct flights of three hours or more, Tier 3 and 4 employees may upgrade to Premium Economy.
 - c) Requests to upgrade service levels on international flights, below Tier 1 and 2, must be reviewed and approved in advance by the CEO (for First Class) and the CFO (for Business Class). The requirement is that any requests for exception approval to upgrade service levels on

international flights will be supported by a valid/substantial business justification. Also, in consideration of the expense associated with the international travel, it is imperative that the number of participants, traveling from the U.S., for non-US-based meetings/events be limited to essential personnel.

With approval of a Tier 2 employee or above, domestic business class also may be allowed under the following circumstances:

- Travel with customers who have business class or first class tickets.

The payment of airfare for Company representatives by third parties is covered by the *Gift & Entertainment Policy*.

Any employee may use personal frequent flyer miles and credits to upgrade business travel at his or her own expense.

3) Additional Airline Fees (Add-On Fees). There has been a proliferation of new airline fees charged to travelers, which at one point may have been complimentary. Some of these fees, and the Company's treatment of such, include:

- Luggage (checked in or carry-on): The cost of one bag is permitted. The cost of a second bag is permitted when there is a valid business reason for more than one bag.
- Seat assignment (aisle, window, exit row, extra leg room, and front of plane (economy)): These expenses may not be charged as a Company expense except for Tier 3 and 4 employees on flights of 3 hours or more.
- Early check in: This expense may not be charged as a Company expense, except when the airline does not offer seat assignment, such as Southwest Airlines.
- Wi-Fi: This is considered a Company expense when Wi-Fi access is used to conduct Company business. The use of Wi-Fi should be avoided on flights of 3 hours or less, unless urgent. Monthly/recurring subscriptions for airline Wi-Fi portals (e.g. Gogo, etc.) require a Tier 2 approval. Any existing subscriptions must be cancelled effective with Policy implementation.

The above list is not intended to be exhaustive, as it continuously changes and varies between carriers. As highlighted in Section 5A, "it is expected that employees traveling on Company business will do so in reasonable comfort and at reasonable cost."

4) Airline Advance Purchase Requirements. Whenever possible, airline tickets should be purchased 14+ days in advance of the planned travel date. Purchasing tickets in advance of the travel date by 14+ days will ensure that tickets are purchased at an optimum price. It is realized that, on occasion, it is not always possible to purchase tickets 14+ days in advance of a travel date due to evolving business plans. In instances where tickets cannot be purchased 14+ days in advance of the travel date, employees are required to include an explanation of why they were not able to purchase the tickets in compliance with the 14+ Advance Purchase Policy. This explanation should be entered in the description field on their expense report. The manager approving the expense report is required to review and approve the employee's explanation as part of the review/approval process.

5) Airline Advance Purchase Restrictions. Except as stated below, penalty restricted fares and non-refundable fares should be used whenever practical. Significant discounts are available on airfares to which strict penalties apply if the itinerary is changed or the trip is cancelled. Because of the cost savings, their use is encouraged when the traveler is reasonably certain the trip will be taken.

In the unusual event that an employee cannot use a Corporate Travel Agency and purchases a nonrefundable ticket and cancels the reservation in a timely manner, the employee will be reimbursed for the cost of the ticket. The employee must utilize any credits or other nonrefundable funds associated with the ticket at the next available business travel opportunity to a region serviced by the same carrier. In no circumstances can the credits be used for personal travel unless pre-approval in writing is granted by the employee who would ultimately approve the expense report form as provided in Section 7, and the employee reimburses the Company.

In the event an employee fails to cancel the trip in a timely manner either by contacting a Corporate Travel Agency (if the ticket was purchased through a Corporate Travel Agency) or the airline directly, the employee will be in violation of this Policy, subject to discipline and may not be reimbursed for the cost of the ticket unless the reason for delay in cancellation is the responsibility of the Company, due to airline delays or other reasons beyond the employee's control.

6) Travel Variations. Additional expenses related to deviations from the business itinerary for any personal reasons (vacation days, weekend side trips (including weekend stays for work on back-to-back weeks), personal entertainment, etc.) are the employee's personal expenses and will not be paid for or reimbursed by the Company. Employees will be asked to document the costs of the airfare and other expenses like lodging, car rental, etc., both with and without such deviations and will be reimbursed at the lower of the cost of the airfare and all other expenses without such deviations, or the amount actually expended.

7) Documentation

- Airline Tickets: As more thoroughly outlined in Section 9, an Airline ticket or E-ticket receipt must be submitted with the related expense report form. A business purpose must be indicated for all travel in the expense report form.
- Refunds/Unused Tickets: For those employees not using the cCard program, if airfare is partially or wholly paid by utilizing a credit or other nonrefundable funds associated with a previously unused ticket, which has been previously reimbursed or paid directly by the Company, the expense report must be prepared such that the Company is given credit for such reimbursement or payment. As set forth above, employees are expected to track and utilize such credits for future business travel.

B. Lodging

Every effort should be made to minimize lodging or room expense. Factors such as free transportation or being within walking distance of the destination can significantly reduce overall expense.

1) Use of Travel Agency. Except for prearranged meetings sponsored or organized by the Company or a third-party that includes hotel, all ABM employees must use an ABM authorized Corporate Travel Agency for booking hotel arrangements. To maximize travel comfort and effectively manage lodging costs, ABM travelers should use facilities available under the ABM Preferred Network of hotel chains or specific contract relationships with hotels in the cities detailed below.

ABM Preferred Network or Hotel Chains

Information on these hotel properties can be obtained through an ABM authorized Corporate Travel Agency.

As part of the Preferred Network, a contract is now in place with Hilton where ABM will receive a minimum discount of 10% on all Hilton Garden Inn and Hampton Inn properties.

Preferred Hotels

JW Marriott Atlanta Buckhead	Atlanta
Doubletree by Hilton Atlanta – Marietta	Atlanta
Hyatt Times Square	New York
JW Marriott Hotel Los Angeles at L.A. Live	Los Angeles
Marriott – Newark Airport	Newark
Doubletree by Hilton – Greenway Plaza	Houston
JW Marriott – Houston Downtown	Houston

2) Type of Lodging. Hotel room expense is to be for single occupancy. Lodging should be comfortable but not luxurious.

3) Rates. Room reservations using a corporate rate should be arranged with as much advance notice as possible. When visiting an area in which a Company office is located, contact the Company office for advice on the most convenient discounted hotel locations. Hotels with negotiated ABM rates are noted as “Preferred” when booking through a Corporate Travel Agency and should be used when the cost and location are reasonable.

The Corporate Travel Agency may offer discounted hotel prices that are non-refundable and non-cancellable. Because of the potential cost savings, usage of these discounted prices and non-cancellable terms are allowed, but should only be used when the traveler is reasonably certain the trip will be taken and is deemed appropriate by the traveler.

4) Payment. Each employee is responsible for paying his/her hotel bill. The itemized hotel folio must be included with the expense report. In special direct-billing situations, unless otherwise informed by the meeting organizer, the employee is responsible for paying all charges other than room and applicable tax expenses. Any business-related charges should be paid by the employee and claimed on the expense report.

5) Cancellation of Hotel/Motel Reservations. When circumstances require cancellation of a guaranteed hotel/motel reservation, such cancellation is the responsibility of the employee. The Company will not reimburse any fees associated with a delayed cancellation, unless the reason for the delay in cancellation is the responsibility of the Company or due to airline delays or other reasons beyond the employee’s control.

6) Telephone/Internet/Fax. All business telephone, internet, and fax expenses are reimbursable. These expenses should normally be supported by an entry on the hotel bill. Please be aware that hotel fax charges may be very high and the transmission of long documents through hotel fax

machines should be avoided except in emergencies. Employees are also encouraged to use their cell phones for calls if less expensive and to take availability of internet access into consideration when making a hotel reservation.

C. Spousal Travel and Dependent

1) Spouse Travel. The general rule is that travel expenses for a spouse (or anyone else related to or residing with an employee) will not be reimbursable as a business expense. Exceptions must be approved by a manager in the employee's chain of management that is Tier 3 or above, and for the CEO by the CFO for two or less trips per year, and by the Chairman of the Compensation Committee of the Board for any excess above two trips per year.

2) Dependent Care. Employees who are engaged in business development entertainment or other approved business activities outside of regular business hours will be reimbursed reasonable incremental dependent care expenses under the following circumstances: (a) the spouse or partner's attendance at the event is approved; (b) the employee does not have a spouse or partner; or (c) any other circumstances with approval of the appropriate Tier 3 manager or above. The reimbursement of dependent care costs is taxable income to the employee.

D. Extended Stay

A return home trip on extended assignment may be authorized by your supervisor every weekend. In lieu of the employee's trip home, the Company may pay the round-trip airfare for the spouse or partner to visit the employee. The spouse or partner's trip must be approved in advance by the employee's manager and a Tier 4 level manager or above.

E. Car Rental

The use of a rental car must serve a business need.

1) Use of Travel Agency. All ABM employees must use an ABM authorized Corporate Travel Agency for all car rental arrangements.

2) Preferred Car Rental Vendors. Car rental agencies with negotiated ABM rates are noted as "Preferred" within the Corporate Travel Agency's on-line booking tool and should be used when the cost is reasonable. Enterprise/National generally offer the lowest rates available, however, on occasion, a lower rate can be obtained from another car rental vendor.

3) Shared Auto. When two or more employees are traveling together, rental autos must be shared, when practical.

4) Class of Auto. Any size car up to Full-sized may be used. Rental of a larger vehicle must be approved in advance by a Tier 2 employee. Premium cars are not an option unless the employee absorbs the difference in cost, from a Full-sized vehicle, as a personal expense.

5) Fueling. Decline the refueling option at the time of rental unless you know in advance that you will be returning to the airport on a tight schedule and a late airport return is unavoidable. Travelers who have declined the refueling option should fuel vehicles before returning the rental. Travelers who have an ABM fuel card for use with a Company or personal vehicle at home should not use the fuel card to refuel a rental vehicle. For employees who are holders of a cCard,

the card should be used to refuel a rental car. For individuals who do not have a cCard, they should submit their request for expense reimbursement for refueling a rental car when they submit their expense report. The cCard should only be used for purchase of fuel in conjunction with a rental car. cCard purchases of fuel without a corresponding rental vehicle will be flagged and treated as being out of Policy.

6) Insurance on Auto Rentals: Claims for Damages. When renting an auto for business purposes within the U.S., do not purchase any optional insurance coverages. ABM's Preferred Vendor, National Car Rental/Enterprise Rent-A-Car, provides Automobile Physical Damage (APD) and Liability coverage for rental vehicles rented for ABM company business. This benefit is included at no additional cost. If damage occurs to a rental vehicle or the driver is involved in an accident involving third-party property or person, the rental company should be notified immediately. The involved ABM driver is responsible for completing all claim-related tasks. If the vehicle is not rented through the Preferred Vendor and physical damage occurs to the vehicle, Visa Commercial Card, ("cCard Visa") provides Automobile Physical Damage (but NOT liability) for vehicles rented using ABM employee's cCard Visa. There are also specific requirements for filing a claim, which must be adhered to in order to receive the benefit. Claims must be filed by notifying the rental company and Visa's Benefit Administrator at 800-VISA-911 and must be made within 45 days. As always, incidents involving the use of rental cars, which involve damage to third-party property or any incident which may involve injuries must be reported to ABM Risk Management at 866-865-7231 or faxed to 800-326-6187. Additionally, as a reminder, ABM's automobile insurance will cover liability associated with rental car use if, for some reason, there is no coverage provided or limits are inadequate.

7) Vehicle Inspection. When renting a car, prior to leaving the rental lot, the employee should conduct a thorough inspection of the vehicle including the body and windows. If anything is observed that could be construed as damage, the employee is responsible for bringing it to the attention of the supplier. The employee should have the supplier note on the contract the inspected damage and have them sign and print their name.

F. Use of Employee's Personal Auto

1) Reimbursement Rate. The Company will reimburse an employee who does not have a car allowance, a Company-provided vehicle or a Company-provided fuel card, for mileage incurred for authorized business at the then current rate set by the IRS. Total miles driven from location to location and the purpose of such travel should be documented on the expense report. A mileage log or sales activity report is acceptable.

2) Repairs or Damage to Private Vehicle. Costs for repairs or damage to an employee's private vehicle while traveling on Company business are included in the car mileage allowance and will not be separately calculated and reimbursed by the Company. Employees are responsible for providing their own insurance for any damage.

3) Parking and Tolls. For those employees entitled to reimbursement described in Section F.1 above, parking, tolls and airport parking fees incurred on Company business are reimbursable. If possible, the lower cost, long-term parking areas at airports should be used for trips that involve an overnight stay.

4) Car Allowance, Fuel Cards, Parking Allowance, and Company-Provided Cars. The following applies to those employees with a car allowance, a Company-provided fuel card, a

parking allowance or a Company-provided car.

- a) Car Allowance. Any employee with a car allowance shall be entitled only to that allowance and shall not be reimbursed for any additional expenses related to the vehicle itself or gas, except that (i) parking away from the employee's usual place of business, tolls and airport parking fees incurred on Company business are reimbursable, and (ii) an employee with a car allowance and a Company-provided fuel card shall be entitled to use the fuel card in accordance with the restrictions or terms of such use imposed by the Company.
- b) Company-Provided Fuel Card. Any employee with a Company-provided fuel card (including in connection with a Company-owned vehicle) is entitled to use the fuel card in accordance with the restrictions and terms on such use imposed by the Company. Fuel card holders shall not be reimbursed for any additional expenses related to the vehicle itself or gas beyond the fuel card established limits, except for parking away from the employee's usual place of business, tolls and airport parking fees incurred on Company business are also reimbursable. Employees with a company-provided fuel card should not use their cCard to purchase fuel once their fuel card monthly limit has been reached. Fuel purchases beyond the fuel card limit must be treated as a personal expense.
- c) Parking Allowance. For employees with a parking allowance, only parking fees incurred away from the employee's usual place of business are reimbursable. If transportation related services used to support Company business are billed monthly, such as an "E-Z Pass" or monthly parking, the monthly statements should be attached to the expense report as a receipt.
- d) Company-Provided Car. Any employee with a Company-provided car shall be entitled to have expenses related to maintenance and repairs paid for by using the Company-provided vehicle maintenance card (i.e. Voyager card) after the expense has been pre-approved by local management. Expenses of \$1000.00 or more must be pre-approved by Tier 4 level or above. In no other instance shall the Company be responsible for car washes, oil changes or any other maintenance or repairs for an employee-owned vehicle.

The Company may, from time to time, impose additional restrictions or terms on an employee's car allowance, Company-provided fuel card, parking allowance or a Company-provided car.

G. Uber, Lyft, Taxi and Other Local Transportation

Uber, Lyft, a taxi, personal car, or public transportation may be used when traveling to and from airports in the employee's home office or the employee's ultimate destination. A car service may be used when Uber, Lyft or a taxi are not available. Selection of a transportation alternative may be influenced by TLC requirements. The least expensive mode of transportation should be considered unless safety factors or time consideration dictate otherwise. Airport limousines or hotel shuttles should be considered when traveling to and from the airports. When use of an employee's own vehicle is not reasonably feasible or when an employee is traveling outside of his or her usual place of business, Uber, Lyft, taxis or public transportation may be used for intra-city business travel.

H. Travel Meals

On an overnight business trip or any business trip outside of an employee's home office involving travel, the employee will be reimbursed for reasonable meal expenses at actual costs up to a \$102

per day limit. Daily expenditures in excess of the daily limit of \$102 should be treated as a personal expense.

When an employee is outside his or her usual place of business and joins a local employee for a meal during which business is discussed, expense for the meal for both or all employees will also be reimbursed at actual costs up to a \$102 per day limit, per employee. The senior employee in attendance will claim the expense on his or her expense report. If two employees have the same seniority, either employee may claim the expense. Original receipts supporting meal expenses must be submitted with the expense report. These meal expenses should be classified as travel expenses for expense report classification purposes.

Under certain circumstances, the cost of a group meal could exceed the daily meal limit of \$102 per person. While, in all circumstances, the senior employees in attendance should exercise good business judgement in the selection of the restaurant; if the daily meal limit is exceeded, the senior leader claiming the expense, should augment the information entered in the expense report description field with an explanation as to why the per employee daily limit was exceeded.

I. Per Diem Payments

Under limited circumstances, where events require, in lieu of reimbursing costs of lodging, meals and other expenses, corporate departments or operating subsidiaries may pay travel per diems to employees, provided that the per diem amounts shall be subject to the approval of the ABM CFO.

J. Business Meals

1) Meals. When a Company employee is traveling, expenses for food and beverage furnished under circumstances conducive to a business discussion involving people outside of the Company who have a relationship or potential relationship to the Company's business are reimbursable (for more information see also the *Gift & Entertainment Policy*). In order to be deductible by the Company for income tax purposes, a substantial business discussion must take place directly before, after or during the meal and the cost must not be lavish or extravagant. In the event that more than one Company employee attends a business meal, the senior employee in attendance must pay and claim the expense on his or her expense report, or either employee may claim the expense if two employees have the same seniority. For more information on properly documenting these expenses, see Section 9 of this Policy and the *Gift & Entertainment Policy*.

2) Alcoholic Beverages. A reasonable amount for cost of alcoholic beverages is reimbursable when, in the judgment of the employee, the expenditure is appropriate and within the employee's daily meal limit of \$102 per day. In all instances, sound judgment must be used in regard to the consumption of alcohol. Employees are responsible for monitoring their own consumption level and that of Company guests. The Company will reimburse transportation costs if an employee believes that for safety reasons the employee, a fellow employee, or guest should be provided with transportation.

3) Formal Attire. With prior approval of their manager, employees may be reimbursed for rental of formal attire for business development events.

K. Publications

No expense for news publications (e.g. Wall Street Journal, New York Times, etc.) should be claimed for reimbursement or direct payment by ABM. On an exception basis, the Company will reimburse the employee for the cost of professional publications that their approving manager deems essential for the performance of their job responsibilities.

L. No Expense Substitutions

No expense should be claimed for reimbursement other than the type of expense actually incurred. Reimbursement will not be made for an expenditure that is in lieu of the normally reimbursable type of expense, e.g., cost of an appreciation gift rather than lodging cost, or lodging expenses for other than licensed, commercially-operated establishments. Payment for lodging with relatives or friends or at other non-commercial establishments is not reimbursable.

M. Pre-Approval Requirements

1) Department Pre-Approval Requirements. Corporate department managers are authorized, but not required, to implement preapproval requirements for out-of-town overnight travel, home business meals and expenses, as well as home business-related events. Managers implementing preapproval requirements shall be responsible for communicating such policies in writing to employees and reviewing all expenses for compliance.

2) Preapproval Documentation. Expenses that require prior written approval must be approved in writing before such expense is incurred. Documentation of written approval or a derivation must be submitted with the expense report. If prior approval is not obtained, the employee runs the risk of not being reimbursed for such expense at the discretion of the employee responsible for approving as described in Section 7 below.

N. Frequent Flyer Miles and Inconvenience Payments

The employee retains all frequent flyer miles and credits on frequent flyer programs. The employee also retains all checks or certificates issued as inconvenience payment by airlines or car rental agencies, provided that the Company does not incur additional expense such as additional meal and hotel expenses, in which case the employee must pay the Company the lesser of the amount of the check or certificate or the additional expense incurred by the Company.

O. Reimbursement for Airline Club

In conjunction with the issuance of this update to the ABM Employee Travel Policy, the Company will not reimburse employees for Airline Club memberships. All Airline Club memberships and annual credit card fees must be treated as a personal expense.

P. Reimbursement of Other Clubs

In conjunction with the issuance of this update to the ABM Employee Travel Policy, it will be the Policy of the Company not to reimburse any new club memberships.

For existing memberships such as golf or sports clubs, that have been previously approved, they

will be reimbursed through October 31, 2016. Post that date, all memberships related costs must be treated as a personal expense.

7. EXPENSE REPORT APPROVALS

All travel and entertainment expense reports are to be signed by the employee claiming the expense either manually on physical expense reports or electronically through the Company cCard submission process. In addition, the report must be approved by an employee meeting all of the following criteria: (1) the employee is within the requesting employee's chain of command and at least one level above the employee seeking reimbursement; (2) the employee has the authority to sign the expense report (seen as an invoice) under the Company's Invoice Approval Policy; and (3) the employee is at a Branch Manager or higher level. Subsidiaries may adopt additional approval and review requirements for expense reports. The ABM CFO shall approve the CEO's expense report forms.

It is the direct responsibility of the employee approving the report to ensure that the report is complete, accurate and supported with the necessary documentation prior to submitting for reimbursement. The approver is responsible for approving the business need, appropriateness and amount of the expenses and compliance with this Policy.

8. ACCOUNTING RESPONSIBILITY

For those employees not part of the cCard program and who use the Shared Services Center, the Shared Services Center's commitment is to have expense reports processed and reimbursed within 10 business days of receipt of the expense report. In circumstances where the approver is not readily available to approve expense reports within a reasonable amount of time, the employee may obtain approval from his or her Controller provided that the approver provides a written delegation of authority, which is attached to the expense report.

9. EXPENSE REPORTING

Reports for those employees not part of the cCard program are encouraged to be submitted no later than 30 days after the expenditures are incurred and are required to be submitted no later than 3 months after the expenditures are incurred. Review of expenses is required to be completed no later than 30 days after submission of the expense report to the approver. For those employees who are part of the cCard program, participants and approvers must meet the dates established by the cCard program.

A. Document Support

The following original document support is required for all expenditures of \$25 or more:

Expenses	Supporting Documentation
Air Transportation	Airline ticket receipt or E-ticket receipt
Train, Bus	Ticket receipt, ticket stub
Taxi, Uber, Lyft	Receipt

Car Rental	Receipt
Lodging	Paid invoice provided by hotel (i.e., folio)
Meals	Meals, original receipts, names, titles and business relationship of parties in attendance, business reason for meal, whether the meal is breakfast, lunch or dinner, date, location, etc.
Telephone, internet, fax	Receipt of bills for all telephone, internet and fax expenses.
Personal auto (mileage, tolls and parking)	An entry on the expense report (or separate log if necessary) showing date, origin/destinations, place and person visited, purpose, mileage, tolls and parking. Airport or lot parking fee receipts required at all times.
Other Expenses	Receipts and/or supporting documentation for all other items.

A print-out of an electronic receipt constitutes an original. There will be occasions in which an employee is unable to obtain a receipt (taxi drivers that do not fill out receipt forms, cash payments for refreshments at sporting events, etc.) or lost receipt. In the absence of a receipt, the employee should submit, within the cCard program or expense report for non-cCard participants, an explanation stating the reason there is no receipt (e.g. lost or vendor did not provide) along with the amount and the business purpose of the expense. Also, if the receipt is missing and the amount was charged to a personal credit card, then the employee should submit the relevant portion of the credit card statement with the expense voucher as additional support for the expenditure.

B. Preparation of the Expense Report

The following are the responsibility of the employee:

- For cCard participants, the employee is to complete the monthly cCard expense report online for both expenses incurred using the cCard and for Out-of-Pocket expenses. For non-cCard participants, the employee is to prepare his/her expense report in ink or type electronically and record expenditures incurred on a daily basis.
- Provide sufficient explanatory details and documents to justify reimbursement. Expenses claimed without sufficient support will generally not be paid.
- Tape all receipts onto an 8.5 x11 piece of paper. This is required since expense reports and supporting documentation will be imaged. For cCard holders, they may use the Wells Fargo CEO Mobile Application to take photos of receipts which can be uploaded into the cCard platform. For support in the use of the CEO Mobile Application employees can contact the cCard Team at abmccard@abm.com or (949) 585-6059.
- Sign and date the expense report or approve online as appropriate.
- Retain a copy of the expense report and receipts (originals for cCard participants and copies for non-cCard participants), for at least 12 months.

- Obtain approval as noted in this Policy.

10. RELOCATION EXPENSES

Relocation expenses require Human Resources oversight and approval prior to incurring any relocation expense. The cCard should not be used to pay for relocation expenses.

11. EXPENSES NOT PAID BY THE COMPANY

The following list is given as an example and is not a complete list of expenses that are not reimbursable as business expenses. All unreasonable expenses will be reported to the appropriate Tier 3 manager or above.

A. Non-business meals and events with other Company employees other than periodic employee appreciation or periodic group team building activities.

B. Dry cleaning and laundry, except (1) on extended out-of-town assignments (greater than 5 days) or (2) while traveling internationally on Company business.

C. In-room movies.

D. Loss of personal property, including cash or cash advances, unless authorized by a Tier 3 or higher employee.

E. Fines or bail for any violation of any law, including parking tickets and traffic violations, unless the vehicle is a leased vehicle for which the Company is responsible for the issue giving rise to the ticket, or there was a valid business reason for incurring the ticket/violation (e.g. emergency service) that is approved by the employee's supervisor.

12. MISCELLANEOUS

A. The reimbursement of certain expenses, including all spousal travel except for a bona fide business purpose and certain types of relocation expenses and dependent care expenses may constitute taxable income to the employee. The Company will not reimburse the employee or "gross-up" for such taxes and will report such income on the employee's Form W-2.

B. Any written approval required by this Policy may be in the form of an email.

13. POLICY COMPLIANCE

A. Disregard for Company policy (including, without limitation, the restrictions in this Policy around the consumption of alcohol), misappropriation of funds or altering of receipts will result in disciplinary action up to and including termination.

B. Questions relating to interpretation of this Policy should be directed to the ABM Travel team at abmtravelcoordinator@abm.com or (949) 585-6020.

APPROVED BY: Board of Directors

First Issued: November 1, 2004

Amended: October 31, 2008

Amended: June 2, 2009

Amended June 2, 2010

Amended June 4, 2013 (implemented January 1, 2014)

Amended January 5, 2016 (implemented April 11, 2016)