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POLITICAL CONTRIBUTIONS POLICY - U.S.

I. INTRODUCTION

This Political Contributions Policy (Policy) is promulgated pursuant to the Aramark Business Conduct Policy (BCP). Aramark is committed to complying with all laws that apply with political contributions.

II. SCOPE AND APPLICABILITY

This Policy applies to:

- all political contributions in the United States involving corporate funds or assets or Aramark Political Action Committee funds, and
- the personal political contributions of Covered Aramark Employees (as defined below) and their spouse/domestic partner, and/or dependent child in the United States and its territories.

This Policy provides the rules that must be followed for any such political contributions. Failure to comply with the Policy could lead to disciplinary action, up to and including termination.

This Policy does not apply to charitable contributions to a 501(c)(3) non-profit entity. For contributions to such entities, please refer to Aramark's Charitable Contributions Policy.

III. DEFINITIONS

Aramark PAC: Aramark has established a political action committee known as the Aramark PAC. The Aramark PAC is funded solely by voluntary personal contributions from eligible Aramark employees and is governed by a PAC Board of Directors composed of Aramark employees.

Aramark PAC Political Contribution: A Political Contribution approved by the Aramark PAC Board of Directors and made using funds from the Aramark PAC.

Corporate Political Contribution: A Political Contribution made using funds from the line of business (LOB).

Covered Aramark Employee: An Aramark employee who is:

- a member of the Executive Leadership Council;
- an Officer of an Aramark legal entity; and/or

- subject to Pay-to-Play laws as determined by Government Affairs Compliance, including certain employees working in Growth, Finance and/or Operations.

GAC: Aramark Government Affairs Compliance.

Pay-to-Play Laws: Laws that regulate political contributions made by persons or entities seeking or holding contracts with governmental entities. These laws limit or prohibit a company, such as Aramark, from entering into a contract with a government entity if the company or certain of the company's employees and their families make or solicit prohibited Political Contributions.

Personal Political Contribution: A Political Contribution made by a Covered Aramark Employee.

Political Contribution: A Political Contribution includes either:

- monetary contributions, such as cash, checks, electronic funds, loans, and/or the purchase of tickets to political fundraising events, and/or
- "in-kind" contributions or expenditures, such as the donation of food and beverages; the use of corporate personnel or facilities, such as a corporate box at a sporting event; the use of personal property, such as hosting a political fundraiser at a personal residence; and/or payment for services

where the recipient is a(n):

- candidate for office,
- campaign,
- political party,
- political committee (e.g., a political action committee or ballot measure committee),
- trade association or other organization that can engage in political activity (e.g., a 501(c)(4) or 501(c)(6) entity), or
- any entity exempt from federal income taxes under Section 527 of the Internal Revenue Code.

Restricted Jurisdiction: Those specific jurisdictions with Pay-to-Play laws that prohibit Aramark from doing business with a governmental entity if Covered Aramark Employees make Political Contributions and/or have reporting requirements for Personal Political Contributions. GAC will maintain a list of "Restricted Jurisdictions" and update that list on a yearly basis, or as required by law.

IV. PURPOSE

Federal law and certain states prohibit a corporation, such as Aramark, from making Political Contributions and impose strict requirements on the Aramark PAC's Political Contributions. In jurisdictions where corporate Political Contributions are permitted by law, Aramark may contribute corporate funds to federal, state and local political candidates and committees, and other political organizations or associations. Likewise, the Aramark PAC may make direct Political Contributions where such contributions are permitted by law. Neither Aramark, nor the Aramark PAC will make Political Contributions that are prohibited under applicable law. To

ensure that Aramark complies with all the applicable laws, GAC must pre-approve any Corporate or Aramark PAC Political Contribution.

Additionally, many states and localities across the United States have enacted Pay-to-Play laws. If Aramark or its employees violate these laws, the consequences can be severe, including barring Aramark from bidding on government contracts, terminating existing government contracts, and in some cases civil or criminal liability for the company and or its employees who make or fail to disclose a prohibited contribution. In many of these states and localities, government contractors such as Aramark must file periodic reports disclosing the names and addresses of certain Aramark employees, and any Political Contributions made by the company and certain Aramark employees. To ensure that Aramark and its employees comply with applicable Pay-to-Play laws, all Covered Aramark Employees, their spouse/domestic partner, and/or dependent child must obtain pre-approval from GAC prior to making or soliciting, directly or indirectly, any Political Contribution at the state or local level.

V. CORPORATE POLITICAL CONTRIBUTIONS AND ARAMARK PAC POLITICAL CONTRIBUTIONS

A. Policy

- Employees must obtain prior written approval from GAC¹ before causing or committing Aramark, a LOB, or the Aramark PAC to make a Political Contribution. Before receiving such approval from GAC, employees must not promise that Aramark, a LOB or the Aramark PAC will make a Political Contribution, commit to the timing or amount of a Political Contribution by Aramark, a LOB or the Aramark PAC, or commit to attend a political fundraiser or outing (e.g., a golf event) as a representative of Aramark when a Political Contribution is required. **Retroactive requests will not be approved or reimbursed.**
- Political Contributions made by Aramark or the Aramark PAC must promote legitimate business interests of Aramark and must be made without regard for the private political preferences of Aramark's employees. Employees must not make or solicit, or commit to making or soliciting, a Political Contribution to obtain or retain business or to obtain any other improper advantage.
- Employees must not encourage an employee to make or solicit a Political Contribution, or threaten reprisal against an employee for contributing to, supporting, or opposing any political candidate or committee.
- Employees must obtain written approval from GAC prior to soliciting Political Contributions from other Aramark employees, Aramark vendors, or Client employees.

¹ The BCP states that the requestor must obtain prior approval from the LOB attorney. The Legal Department has delegated approval authority to the central Aramark Government Affairs Compliance team.

- Aramark will not directly or indirectly reimburse or otherwise compensate an employee or entity for Political Contributions.
- Aramark will not make a Political Contribution that is illegal, may create the appearance of impropriety, or may otherwise damage Aramark’s reputation.

B. Process

To request advance approval of a Corporate Political Contribution and/or Aramark PAC Political Contribution, please use the Political Contribution Request Form, which can be found on the Government Affairs Compliance website under Ethics & Compliance at Aramark.net.

GAC will coordinate the approval process with key stakeholders, including Legal, LOB leadership and, as necessary, the Aramark PAC Board of Directors and Aramark Communications/Public Affairs. Vetting Political Contribution requests involves several steps, including gathering relevant facts, legal review, and strategic analysis to ensure that proposed Political Contributions are in the best interest of Aramark. The review process may take a week or longer. All outside legal review costs incurred to vet a proposed Political Contribution will be charged to the LOB.

C. Disbursement of Approved Political Contributions

If a Political Contribution request has been approved by all stakeholders, GAC will notify the requestor of such approval and will provide instructions on disbursement.

- Where lawful, the requested Political Contribution will be disbursed from corporate funds by the LOB (i.e., a corporate contribution).
- In jurisdictions that prohibit Corporate Political Contributions, the contribution will be an Aramark PAC Political Contribution.

Absent special circumstances, GAC will mail all Political Contributions to the campaign or committee directly. Non-Aramark employees, including government affairs consultants, lobbyists or clients, may not deliver a Political Contribution to a candidate or committee unless the timing and manner of delivery has been specifically approved in writing by GAC.

D. Political Functions

If an approved Political Contribution is associated with an event (e.g., a golf outing, reception or fundraiser) and an employee wishes to attend or invite others to attend the event—including current or prospective clients and/or government employees—then attendance at the event must be approved separately in accordance with Aramark’s BCP and Gifts and Entertainment Policy and other applicable approval processes. Contact GAC or your LOB attorney for additional guidance.

VI. PERSONAL POLITICAL CONTRIBUTIONS - COVERED ARAMARK EMPLOYEES

A. Policy

- All Covered Aramark Employees, their spouse/domestic partner, and/or dependent child must obtain pre-approval from GAC prior to making or soliciting, directly or indirectly, any Political Contribution:
 - At the state (including territories) or local level, or
 - To a federal candidate who is a state or local elected official at the time of the contribution.
- Employees must not make or solicit, or commit to making or soliciting, a Personal Political Contribution to obtain or retain business or to obtain any other improper advantage.
- Aramark will not directly or indirectly reimburse or otherwise compensate an employee for Personal Political Contributions.
- If required by law, Aramark will include the Covered Employee's name and address, and that of their spouse, and/or dependent child, on registration statements.

B. Process

If you are a Covered Aramark Employee and you, your spouse/domestic partner or dependent child would like to make or solicit a Personal Political Contribution, you must contact GAC before you make or solicit, or commit to make or solicit, a Personal Political Contribution. GAC will use the Covered Aramark Employee Personal Political Contribution Approval Process, which can be found on the Government Affairs Compliance website under Ethics & Compliance on Aramark.net. GAC will evaluate whether a proposed Personal Political Contribution is in a Restricted Jurisdiction and complies with applicable law.

VII. Questions?

Please contact GAC at gacompliance@aramark.com with questions about this Policy or visit the Government Affairs Compliance website under Ethics & Compliance at Aramark.net.