



# BUSINESS CONDUCT POLICY



©2014 Aramark. All rights reserved.

All copyrights, trademarks, registered trademarks, servicemarks and registered servicemarks are the property of their respective owners. Aramark and the Starperson logo and design are trademarks of Aramark Services, Inc. and/or its subsidiaries or affiliates. Any use of such copyrights, trademarks, service marks, registered or pending and/or trade dress, without the prior written consent of Aramark Services, Inc. and/or its applicable subsidiary or affiliate owner of the same is expressly forbidden.

## A Message from Our President and Chief Executive Officer



**Eric Foss**

Dear Colleagues,

Aramark is an amazing company. Our business is a people business, and we are known for our great people—more than a quarter of a million of us who live out our mission each and every day to deliver experiences that enrich and nourish lives.

Since Davre Davidson founded the company in 1936, we have managed our business with the utmost integrity and respect. Nowhere is that more evident than in our commitment to conducting every aspect of our business ethically and in compliance with the law.

The Business Conduct Policy is a key component in our ongoing commitment to this goal. It explains in a practical way the basic rules and principles that apply to all of us in our work. Our Business Conduct Policy also serves as a reminder to speak up if you see something that does not seem right.

Every Aramark team member—employees, officers, and board members alike—must be sure that our actions are consistent with our mission and our values. Trust is the foundation of our business, and we earn this trust by consistently performing in an honest and straightforward manner.

Please review the Business Conduct Policy thoroughly and follow it completely; it will help you to make decisions that are consistent with our values and in compliance with the law.

Thank you for all that you do to ensure that we continue to live up to these high ethical standards.

A handwritten signature in black ink, appearing to read "E. Foss". The signature is fluid and cursive, with a long horizontal stroke at the end.

# MISSION, VALUES, AND FOCUS

---

## Our Mission

For any business to succeed, it needs a clear and common understanding of where it is headed and the ultimate destination. For Aramark, that starts with our mission:

Deliver experiences that enrich and nourish lives.

This means that each of us must consider what we can do to have an enriching and nourishing impact on people's lives every day and everywhere.

## Our Values

Our values help guide how we work and relate to each other, and the behaviors we need to ensure long-term success. The following values personify how we conduct ourselves:

- Sell and Serve with Passion
- Front Line First
- Set Goals. Act. Win.
- Integrity and Respect Always

---

## Our Focus

Every organization needs a clear sense of what matters most. For us, these are the constituents who rely on us to deliver and build what they care about most. Our focus will build:

- Consumer Advocacy
- Client Success
- Employee Engagement
- Shareholder Value
- Local Communities

Our commitment to the Business Conduct Policy is a central part of fulfilling our mission, adhering to our core values, focusing on our constituents, and ensuring that every employee conducts business with the utmost integrity and according to the highest ethical standards.

# CONTENTS

---

## Introduction

2

About Our Business Conduct Policy (BCP)

Our Responsibilities

Compliance With Laws

Take Action! Raise Concerns and Report Suspected BCP Violations

Retaliation Is Prohibited

## Our Business Practices and Standards

8

Conflicts of Interest

Corporate Opportunities

Anti-Bribery and Corruption

Gifts and Entertainment

Accurate Books and Reporting

Antitrust and Collusion

Fair Dealing

Insider Trading and Securities Transactions

## Our Commitment to the Workplace Environment

22

Employment and Equal Opportunity

Workplace Violence

Harassment

Workplace Relationships

Illegal Substances and Alcohol Abuse

Environment, Health, and Safety

---

## Protecting Company Assets and Proprietary Information 28

Company Assets

Computers, Email, and the Internet

Social Media

Copyright Infringement and Software Piracy

Privacy and Confidentiality

Records Management

## Our Interaction with the Government and the Public 36

Responding to Government, Media, and Investor Inquiries

Political Contributions

Engagement of Lobbyists

Public Disclosures

## Resources for Voicing Questions or Concerns 40

## Waiver 43

Please visit [www.aramark.com/policy](http://www.aramark.com/policy) or [www.aramark.net/policy](http://www.aramark.net/policy) for the most up-to-date version of the Business Conduct Policy and supporting policies.



## IN THIS SECTION

### **About Our Business Conduct Policy (BCP)**

Aramark is committed to conducting business according to the highest ethical standards and with integrity and respect always.

### **Our Responsibilities**

The BCP applies to all of us, including our Board of Directors. We are all responsible for reviewing, understanding, and making ethical decisions consistent with the BCP.

### **Compliance With Laws**

It is Aramark policy to comply with the laws in each country in which Aramark conducts business.

### **Take Action!**

Raise concerns and report suspected BCP violations.

### **Retaliation Is Prohibited**

Aramark does not tolerate acts of retaliation against an employee who, in good faith, reports a suspected violation of the BCP or any law.

## About Our Business Conduct Policy (BCP)

Preserving Aramark's reputation is a shared responsibility. It requires that we act with integrity and respect always. Our strong reputation is our most fundamental asset and one that must be preserved by each of us through what we do every day on behalf of the company. We act with integrity because it is the right thing to do for our stakeholders and the larger community. Any unethical actions, no matter how minor, can damage our reputation and affect all of us.

Our Business Conduct Policy outlines the legal and ethical standards that every employee at Aramark must follow each and every day. The BCP provides us with the guidelines and resources to conduct business ethically and in compliance with the laws in each country in which Aramark conducts business.

## Our Responsibilities

Compliance with the BCP is mandatory. This means taking personal responsibility for doing the right thing and speaking up about others' conduct that might violate the BCP, company policies, or any law.

Those who fail to comply with the BCP, fail to disclose reportable matters, fail to cooperate with an investigation of a possible violation, or who knowingly make a false report, will be subject to disciplinary action up to and including termination of employment and appropriate legal action.

## Compliance With Laws

It is Aramark policy to comply with the laws in each country in which Aramark conducts business, including, but not limited to, employment, labor and the workplace, environmental, antitrust and securities laws, and the United States Foreign Corrupt Practices Act and other anti-corruption laws. It is the responsibility of each Aramark employee to adhere to the restrictions and standards imposed by those laws and regulations.

## Take Action! Raise Concerns and Report Suspected BCP Violations

If you become aware of a possible violation of the BCP or any law, you must report the incident. Raise your concerns promptly because the longer we wait to address a concern, the more serious the situation may become. There are multiple ways to do so.

- The Aramark Employee Hotline is managed by an independent service company, allowing you to make a report, anonymously if you prefer. In the United States and Canada, call **1-877-224-0411** or visit **[www.aramarkhotline.com](http://www.aramarkhotline.com)**.

To contact the Hotline from outside the United States and Canada, visit **[www.aramarkinternationalhotline.com](http://www.aramarkinternationalhotline.com)** or visit the Global Security website at **[www.aramark.net](http://www.aramark.net)** to obtain the local toll-free access number for your country.

- You may also contact any of the following:

Vice President, Audit and Controls	215-238-3110
Vice President, Global Security	800-338-5641
Vice President, Compliance	215-238-3435
Business Conduct Policy Committee Secretary	215-413-8833

You may also send a letter addressed to any of the above at Aramark corporate headquarters:  
**Aramark, 1101 Market Street, Philadelphia, Pennsylvania 19107.**

- If you have a complaint regarding accounting, internal accounting controls, or auditing matters, you may contact the Audit and Corporate Practices Committee of the Board of Directors (the “Audit Committee”). You may do so by contacting the Employee Hotline, by sending a letter addressed to the Audit Committee at Aramark corporate headquarters, or by contacting the Vice President, Audit and Controls, via email at **audit@aramark.com** or at the telephone number noted on the prior page. Any of these contacts may be made on a confidential basis.

Please visit **[www.aramark.net/policy](http://www.aramark.net/policy)** to review the ***Complaint Procedures Regarding Accounting and Auditing Matters*** for additional guidance.

- Your line of business attorney can also answer questions about the BCP, company policies and procedures, and legal issues. If you are unsure which attorney is responsible for your line of business, email **legal@aramark.com** and you will be directed to the appropriate attorney.

## Retaliation Is Prohibited

Do not be afraid to speak up about any situation that you believe is inconsistent with the BCP or any law. You will never be subject to retaliation or punishment for reporting a suspected violation, as long as you act in good faith and with a reasonable belief that the information you are providing is true. Aramark will investigate and take claims of retaliation very seriously. Retaliation is grounds for disciplinary action up to and including termination of employment and appropriate legal action.



## IN THIS SECTION

### **Conflicts of Interest**

Avoid and disclose any conflicts or potential conflicts between your personal interests and the interests of Aramark. This includes outside activities that might interfere with your judgment or responsibilities to Aramark.

### **Corporate Opportunities**

You must not use Aramark property, information, or position for improper personal gain.

### **Anti-Bribery and Corruption**

Aramark prohibits the offer or receipt of any questionable payments in connection with existing or prospective business.

### **Gifts and Entertainment**

You must follow Aramark's Gifts and Entertainment Policy in considering whether it is appropriate to give or receive a gift or entertainment to or from a client, potential client, supplier, or government official.

### **Accurate Books and Reporting**

Our books and reporting must be complete, accurate, honest, and timely.

### **Antitrust and Collusion**

We have an obligation to comply with all antitrust laws, compete fairly and honestly, and avoid even the appearance of unfair business practices.

### **Fair Dealing**

Never misrepresent important facts or engage in unfair or deceptive acts.

### **Insider Trading and Securities Transactions**

Never use or disclose non-public, confidential, or highly sensitive information about Aramark or our suppliers, clients, competitors, or another publicly held company.

## Conflicts of Interest

You must avoid any situation that creates a real or perceived conflict of interest. Conflicts can occur when your personal interests, activities, or investments (or those of your family members) could affect, or appear to affect, the objectivity of your decision making on behalf of Aramark. A conflict of interest exists if you or your family member is in a position to receive a personal benefit from a transaction involving Aramark for which you are a decision maker, or in a situation where your judgment may be influenced by a financial or personal relationship with a client or supplier.

### Who is a “family member” under the BCP?

A family member can be any of the following: your spouse, parent, child, sibling, mother-in-law, father-in-law, brother-in-law, sister-in-law, son-in-law, daughter-in-law, domestic partner, and anyone (other than your employee) who shares your home. Keep in mind that potential conflicts are not limited to just relationships with relatives or family members. Conflicts of interest may arise with anyone with whom you have a friendship or personal relationship.

A conflict of interest may arise, for example, if you or your family member:

- Has a financial interest that could affect your personal judgment (such as a personal interest in a supplier or customer of Aramark)
- Gains personally through the use of corporate property or confidential information
- Misuses your position at Aramark in a way that results in personal gain
- Recommends, negotiates, or contracts on behalf of Aramark on one side of a transaction and a related party is on the other side

### What is a “related party”?

An organization of which the Aramark employee is an officer or partner;

An organization of which the Aramark employee is the beneficial owner of ten percent or more;

Any trust in which the Aramark employee has a substantial interest or serves as a trustee or in a similar fiduciary capacity; or

Any family member of the Aramark employee who may significantly influence or be influenced by a business transaction with an organization of which he or she is an officer, director, or partner.

**Q:** Anthony, a front line manager at a higher education account, purchased a nearby family restaurant. Because the restaurant is several miles away from the university, Anthony believes this purchase is not a conflict of interest. Is Anthony correct?

**A:** No. The similarity of the two businesses creates the potential for a conflict of interest. For example, Anthony may feel competing pressures when dealing with suppliers or when recruiting for employees. In addition, patrons may think the restaurant is an Aramark operation, and their decisions may be influenced by this perception.

**Q:** Michelle is a food service director at a business and industry account. Michelle's husband just bought a bakery that will supply bread and rolls to food service facilities in the area, including the one where Michelle works. Although Michelle is ultimately responsible for purchasing decisions because the food production manager reports to her, Michelle does not believe this is a conflict of interest because she is not directly responsible for the purchasing decisions. Is Michelle correct?

**A:** No. While it is okay for Michelle's husband to own a bakery, it would be improper for Michelle's location to purchase from her spouse's bakery. Because Michelle is involved with buying products for Aramark she must not do business with any party to whom she is related, such as her spouse or other family member.

Having a conflict of interest is not necessarily a BCP violation, but failing to disclose it is. Use good judgment, and if you think that you may have a conflict of interest, or if you are aware of a potential conflict of interest of another employee, promptly disclose the situation to your manager so that it can be properly evaluated. If you have additional conflict of interest questions, contact your line of business attorney or visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the ***Conflicts of Interest Policy*** for additional guidance.

Significant conflicts may require reassignment of roles, withdrawal from business decisions, or elimination of the competing interest. In rare cases where a conflict may be permissible, written approval is required.

Executive officers and directors must disclose any actual or apparent conflict of interest situation involving themselves to the Audit and Corporate Practices Committee of the Board of Directors.

## Corporate Opportunities

You must not use Aramark property, information, or position for improper personal gain, and unless approved in advance by your line of business attorney, no employee may compete with Aramark directly or indirectly.

All employees owe a duty to Aramark to advance Aramark's legitimate interests when the opportunity to do so arises. Directors and executive officers are prohibited from taking for themselves personally opportunities that are discovered through the use of Aramark property, information, or position without the consent of the Audit and Corporate Practices Committee of the Board of Directors. For all other employees, such consent must be obtained from the General Counsel's office.

**Q:** Greg, a sales representative, has been approached by a consultant who can help him obtain a significant contract to provide food service. The consultant's services will cost \$50,000, and \$10,000 of those funds will go to the consultant's contact within the prospective client's procurement office. Greg is told that this "is just the price of doing business here." How should Greg respond?

**A:** Paying money or giving anything of value to anyone for the purpose of obtaining business violates the BCP. Greg must not engage this consultant, and he must report the consultant's request to his line of business attorney.

## Anti-Bribery and Corruption

You must never enter into any agreement or arrangement involving commissions, rebates, bribes, kickbacks, or other payments when you know or suspect that the probable result of the payment is to:

- Influence an act or decision that may appear to give Aramark an improper advantage
- Improperly reward anyone in connection with existing business or prospective business

Aramark complies with anti-bribery and corruption laws in every jurisdiction in which the company operates. In some countries, the law makes it a crime to pay a bribe to anyone (such as the UK Bribery Act). The U.S. Foreign Corrupt Practices Act (FCPA) and other laws prohibit direct or indirect payments or giving anything of value to government officials.

All consultants, agents, or other third parties acting on behalf of Aramark must also adhere to our anti-bribery requirements. If you wish to retain a consultant, agent, or other third party to obtain new business or retain existing business, you must first contact your line of business attorney for guidance as to how to ensure that party complies with the requirements of the BCP.

Gifts and entertainment of government officials, even if lawful, may create the appearance of a bribe. Approval in advance from your line of business attorney is required for any gift or entertainment of a government official, except those specifically permitted by the Gifts and Entertainment Policy.

Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the ***Gifts and Entertainment Policy*** for additional guidance.

### Definition of a “government official”:

A government official includes the officers and employees of any government agency (or anyone performing a similar function), as well as officers and employees of government-controlled companies (such as public hospitals or public educational institutions), public international organizations (such as the United Nations), political parties, party officials, and candidates for public office.

**Q:** Ming, a manager, is anxious to help her location get a business license so she can expand services into a new geographic location. Ming was told by a local colleague that a payment of \$100 to the filing officer is a common practice to help speed up the process. How should she proceed?

**A:** Ming must not make this payment, known as a “facilitating payment.” Facilitating payments are generally not allowed under international anti-bribery laws and are prohibited by Aramark policy. Ming must call her line of business attorney for guidance before moving forward with the licensing process.

## Gifts and Entertainment

Providing or accepting gifts or entertainment to or from clients or suppliers can easily create the appearance of a conflict of interest, especially if the value of the gift or entertainment is significant. However, modest and appropriate entertainment such as business meals or attending local events with clients can be a productive part of a business relationship, provided that the entertainment is not excessive and does not create the appearance of impropriety.

In addition, there are many laws that prohibit providing even modest gifts or entertainment to a government employee, such as an official or employee of a state university, public school district, county hospital, sheriff's department, or government-owned business.

You must follow Aramark's Gifts and Entertainment Policy in considering whether it is appropriate to give or receive a gift or entertainment to or from a client, potential client, supplier, or government official. Contact your line of business attorney or visit

**[www.aramark.net/policy](http://www.aramark.net/policy)** to review the ***Gifts and Entertainment Policy*** for additional guidance.

## Accurate Books and Reporting

The United States securities laws, and the laws of the countries where we operate, require us to ensure that our books and records are complete, accurate, honest, and timely. You must never falsify, or ask or cause someone else to falsify, company books or records or client documentation by making false entries or through deliberate omission. All expense reports, accounts payable, invoice transmittals, inventory summaries, client billing data, payroll data, and any other similar documents or records must be complete, accurate, honest, and timely. You may not open or maintain any undisclosed or unrecorded corporate account, fund, or asset or any account with a misleading purpose.

You must not provide false or misleading information to Aramark Global Security, Aramark's Audit and Control Services department or our independent auditors.

You may make a good faith complaint regarding accounting, internal accounting controls, or auditing matters by contacting the Audit and Corporate Practices Committee of the Board of Directors or by contacting the Vice President, Audit and Controls, following the procedures outlined in the *Take Action! Raise Concerns and Report Suspected BCP Violations* section of the BCP.

**Q:** Diane, a front line manager, notices that the inventory value resulting from this month's physical count was lower than she expected. Based on this value, the cost of sales for the month will be much higher than planned. Diane has not been able to identify any counting errors or obvious pricing or clerical errors in the inventory valuation, as she has not had the time to go through everything carefully. Is it okay for Diane to report a higher inventory value this month so that cost of sales will be more in line with expectations?

**A:** No. The reported inventory value must be based on the most supportable information available, in this case the physical count value; therefore, Diane's use of a less supportable, arbitrarily adjusted value would violate the BCP. Diane must discuss the situation with her supervisor if she is unable to resolve the discrepancy before the reporting deadline.

**Q:** John, a front line manager, notices that operating results this month are below expectations. Sales were down because the client postponed a large catering event, plus money was spent on repairs that were not in the budget. The district manager suggests that John delay recording several recent supplier invoices until next month so that this month's results look better. John also decides to record a receivable for the postponed catering event, expecting that he will eventually be able to bill this to the client. Is it okay for John to do these things?

**A:** No. The intentional omission of liabilities (such as supplier invoices and related expenses) and the booking of fictitious assets (such as receivables and related sales) are both violations of the Accurate Books and Reporting section of the BCP. John must promptly report the district manager's suggestion that he act unethically.

## Antitrust and Collusion

You must comply with laws that prohibit unfair business practices and promote vigorous competition that is free from collusion. These laws protect free trade and consumers' freedom of choice.

You must never:

- Discuss or agree with a competitor on prices, discounts, warranties, or anything else affecting the terms and conditions of sales to customers
- Coordinate bids with a competitor, including agreements to refrain from bidding, to bid at a certain price, or to submit a bid that is intentionally less favorable than a competitor's bid
- Divide or assign sales territories, customers, services, or product lines with a competitor
- Participate in any refusal to deal with specific customers or suppliers

You should be especially cautious when attending conferences, trade shows, or other meetings where you have contact with competitors to avoid even the appearance of unfair business practices. If subjects such as pricing, bidding, territorial or customer allocation, or refusal to deal are mentioned at any meeting among competitors, you must leave the meeting immediately and report the incident to your line of business attorney.

You must not respond to trade association questionnaires or other inquiries seeking information relating to prices—all such questionnaires must be forwarded to your line of business attorney.

**Q:** Joel is submitting a bid for the local school district contract and has a friend who works at a competitor that is also competing for the business. Joel knows that the competitor has a contract at a nearby hospital that comes up for renewal in a few months. He considers calling his friend and offering to not bid on the hospital contract if the competitor agrees to withdraw its bid for the school district contract. Should he make the phone call?

**A:** No. Doing so would be a violation of both the BCP and antitrust and fair competition laws. Joel could be subject to criminal prosecution for such action. Employees should avoid contact with competitors wherever possible to avoid even the appearance of unfair business practices.

## Fair Dealing

It is Aramark policy to compete fairly and honestly. You must not engage in manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair dealing practice. You must endeavor to deal fairly with customers, suppliers, competitors, and employees.

Federal and state laws prohibit unfair methods of competition and unfair or deceptive acts and practices. These laws, like antitrust laws, are designed to protect competitors and consumers. Examples of prohibited conduct include:

- Theft or misuse of proprietary, confidential, or trade secret information
- Commercial bribery or payoffs to induce business or breaches of contracts by others
- Making false, deceptive, or disparaging claims or comparisons regarding competitors or their services or products
- Mislabeling products or services
- Making affirmative claims concerning Aramark's services or products without a reasonable basis for doing so

### What is “material non-public information”?

Material non-public information is any information that an investor would consider important in making a decision whether to buy, sell, or hold securities and could include, for example, Aramark's unannounced intention to award or receive a significant contract, enter into a new business or geography, or acquire another business.

Material information does not have to relate to a company's business; information about the contents of a forthcoming publication in the financial press that is expected to affect the market price of a security could be material.

## Insider Trading and Securities Transactions

Insider trading is the act of buying and selling securities while in possession of material non-public information. During your employment at Aramark, you may come to possess non-public, confidential, and highly sensitive information (inside information) about the company or our suppliers, clients, competitors, or other publicly held companies. Inside information is information not known by the public that, if it were known, would likely affect the market price of the securities issued by a company (ours or any other) or would be considered important to a reasonable investor in deciding whether to buy or sell those securities. Securities include both equity and debt securities. In particular, you may not trade Aramark securities while in possession of material non-public information about Aramark.

The use of inside information for personal financial benefit, or to tip others who may make an investment decision on the basis of this information, is unethical and illegal. Even a casual conversation resulting in disclosure without the intention of personal gain conflicts with the best interests of Aramark, may violate securities laws, and could have serious consequences.

Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the **Securities Trading Policy** for additional guidance.

**Q:** Damian learns through a client liaison that his client, a publicly traded company, will soon report quarterly earnings that are significantly higher than projected. Damian wants to purchase some stock in the company. May he do so?

**A:** No. Damian may not purchase stock in the company until the financial information is made available to the public. Buying or selling stock while in possession of such inside information is both unethical and illegal, and could subject Damian to serious consequences, including criminal prosecution.



## IN THIS SECTION

### **Employment and Equal Opportunity**

Aramark is committed to the equal treatment of all employees and prospective employees.

### **Workplace Violence**

Aramark is committed to maintaining a safe, non-threatening, and productive work environment for all employees.

### **Harassment**

Sexual and other workplace harassment is not tolerated.

### **Workplace Relationships**

Dating or intimate relationships between managers and subordinates are discouraged and must be disclosed if they do occur.

### **Illegal Substances and Alcohol Abuse**

Aramark maintains a drug-free work environment. You must not report to work while under the influence of illegal drugs or alcohol or while impaired by legal prescription medication.

### **Environment, Health, and Safety**

Aramark complies with all laws designed to protect our environment and the health and safety of our employees, clients, and the community.

## Employment and Equal Opportunity

Aramark is committed to a policy of equal treatment for all employees and prospective employees. Our policy is to hire, promote, compensate, discipline, and make all other personnel decisions without regard to race, color, religion, national origin, age, sex, gender, pregnancy, sexual orientation, gender identity, genetic information, disability, military status, veteran status, or other classification protected by applicable law.

Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the ***Equal Employment Opportunity and Affirmative Action Policy*** for additional guidance.

## Workplace Violence

Aramark is committed to maintaining a safe, non-threatening, and productive work environment for all employees. Violence, threats of violence or intimidation, or other threatening or hostile conduct toward Aramark employees or property, or against persons or property associated with our business operations, will not be tolerated.

You must promptly report any acts or threats of violence or assaults to your supervisor, to Human Resources, to on-site security, or to the local police department, and then promptly to Aramark Global Security. You may also report any threats or threatening activity to the Employee Hotline. Management and supervisory personnel may report these incidents online at [www.aramark.net/security](http://www.aramark.net/security).

Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the ***Policy Regarding Violence in the Workplace*** for additional guidance.

**Q:** Mary, a front line manager, has noticed that John, a food service worker, seems to be upset at work. He recently had a verbal altercation with a coworker. John's performance has diminished, his personal appearance is unkempt, and he seems depressed. Today, John and another employee got into a fist fight, although no one was injured in the fight. How should Mary handle this situation?

**A:** With the noticeable change in John's appearance and behavior, Mary has a responsibility to discuss with John his diminished performance and his inability to get along with other employees. Because of the escalation of the situation to a physical altercation, she should also discuss the situation with her immediate supervisor and with Aramark Global Security.

## Harassment

Aramark does not tolerate any form of sexual or other harassment in the workplace, including but not limited to, insulting or degrading remarks or conduct, offensive or derogatory jokes, or conduct that creates an intimidating or hostile work environment. This includes not only conduct based on an employee's sex or gender, but also conduct based on any other characteristic protected by applicable law, including but not limited to, race, color, religion, national origin, age, pregnancy, sexual orientation, gender identity, genetic information, disability, military status, or veteran status.

Supervisors may not threaten or insinuate that an employee's refusal to submit to sexual advances will adversely affect the employee's continued employment, compensation, performance evaluations, advancement, assigned duties, or any other condition of employment.

If you feel you have been subjected to any form of workplace harassment, promptly report the incident to your supervisor, to Human Resources, or to the Aramark Employee Hotline. Supervisors who receive a complaint of workplace harassment must promptly contact the Human Resources Department of the line of business in which the employee works. An investigation will be conducted, and, if warranted, disciplinary action will be taken, up to and including termination of employment.

## Harassment (continued)

Retaliation or discrimination against any employee or other person for making a complaint of workplace harassment or assisting in an investigation is prohibited. Anyone engaging in retaliation will be subject to disciplinary action up to and including termination of employment and appropriate legal action.

Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the ***Policy Against Sexual Harassment and Other Workplace Harassment***.

## Workplace Relationships

Aramark discourages dating or intimate relationships between managers or supervisors and their subordinates. Even if the relationship is voluntary and welcome by both parties, a manager may not maintain a dating or intimate relationship with an Aramark employee if the employee works directly or indirectly for the manager or if the manager has compensation, performance review, or promotional input with respect to the employee.

If you are in a dating or intimate relationship with a subordinate, you must promptly inform your supervisor and Human Resources so that appropriate steps can be made to end the reporting relationship. Anyone failing to report a dating or intimate relationship with a subordinate is subject to disciplinary action up to and including termination of employment.

## Illegal Substances and Alcohol Abuse

Aramark maintains a drug-free work environment. You must comply with all laws prohibiting or controlling the manufacture, sale, distribution, use, and possession of illegal drugs and alcohol,

particularly when on Aramark or client premises or while on company business. Reporting to work under the influence of illegal drugs or alcohol or while impaired by legal prescription medication is strictly prohibited. Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the ***Drug-Free Workplace Act Policy***, or contact Human Resources for additional guidance.

## Environment, Health, and Safety

Aramark is committed to engaging in environmentally sound practices and to complying with all applicable environmental, health, and safety laws in all the countries in which we conduct business. We must conduct business operations in a manner that protects the natural environment and human health and safety.

To maintain a safe and healthy workplace and to protect the environment in which we work, everyone is responsible for following all environmental and health and safety rules, policies, and practices, and for promptly reporting all accidents, violations, hazardous material spills, injuries, inquiries from government agencies, and any unsafe equipment, practices or conditions. If you have any questions about environmental, health or safety requirements, or your specific responsibilities, contact Aramark Global Risk Management for further guidance.

**Q:** Victor, a front line manager, asks an employee to clean up an over-crowded supply closet. While organizing the closet, the employee finds several containers of an unexpired cleaning chemical that are not being used, but are taking up needed space. Unsure of what to do with the chemical containers, she asks Victor for guidance. How should Victor direct the employee to handle and dispose of the chemicals properly?

**A:** Victor must ensure the employee understands the hazards associated with the chemical. The chemical's label and Material Safety Data Sheet (MSDS)/Safety Data Sheet (SDS) contain this information, along with proper handling guidance. He should then contact Aramark Global Risk Management to identify approved waste disposal vendors.



## IN THIS SECTION

### **Company Assets**

You must respect Aramark property. Use of Aramark assets, including computers and related information technology, must comply with established company policies.

### **Computers, Email, and the Internet**

Aramark computers, network access, and information systems are provided for business use. Email and Internet usage may be monitored.

### **Social Media**

Follow Aramark's Social Networking Policy and respect the privacy of clients, consumers, and coworkers when using social media sites.

### **Copyright Infringement and Software Piracy**

Aramark respects copyrights owned by others and permits the use of copyrighted materials only as allowed by law or through an agreement.

### **Privacy and Confidentiality**

We must safeguard non-public or proprietary information entrusted to us by Aramark or our suppliers, clients, and consumers.

### **Records Management**

Every Aramark employee is responsible for properly managing the company's records.

## Company Assets

Our assets—including cash, inventory, property and equipment, and proprietary information, as well as our name, brand, and customer relationships—are the resources we use to conduct our business. You must use these assets only for legitimate company business and safeguard them against theft, loss, waste, or abuse. You must also extend this same degree of care to any assets entrusted to Aramark by clients or others.

You must not use Aramark's assets for personal gain. Doing so may subject you to disciplinary action or criminal prosecution.

If you suspect another person is using company assets improperly, you must report this to your supervisor, to the Aramark Employee Hotline, or to one of the Aramark officers specified in the BCP.

Upon termination of your employment or affiliation with Aramark, you are required to return Aramark property and to return or destroy materials containing company information described in the *Privacy and Confidentiality* section of the BCP.

**Q:** Joseph, a food service worker, has noticed that one of the cashiers at his location doesn't always record sales transactions in the cash register when accepting payments from customers. At the end of the day, Joseph notices the cashier taking some cash out of the register and putting it in her pocket. Joseph is concerned the cashier might be stealing from the company, but the cashier is a long-term employee, and Joseph is afraid no one would believe him if he told them his suspicion. What should Joseph do?

**A:** Stealing money from the company is a crime, and Joseph has a duty to protect company assets by reporting a suspected crime. He must report it promptly to his supervisor, to the Aramark Employee Hotline, or to one of the Aramark officers specified in the BCP, and he may do so without fear of retaliation.

## Computers, Email, and the Internet

Aramark's computers, mobile devices, network access, and information systems, including email and Internet, are provided for Aramark business use. All email messages generated or received by these systems are considered Aramark property. The company may review your email, text messages, and Internet usage in the event of possible security breaches, policy violations, or other unauthorized or illegal actions.

Personal use of your Aramark computer or email is permitted as long as it is incidental and does not:

- Involve any prohibited activity
- Interfere with your productivity
- Deplete system resources or storage capacity

You may never use your company computer to access websites or send emails that contain language, images, or sounds that are harassing, discriminatory, or threatening. Viewing, downloading, or accessing sexually explicit material is strictly prohibited. Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the **Information Technology and Security Policy** for additional guidance.

## Social Media

When using social media such as YouTube, Facebook, Twitter, and LinkedIn, as well as blogs, collaborative Web-based discussion forums, online publishing, and user-generated media for business purposes and for personal reasons, employees in the U.S. must follow Aramark's Social Networking Policy. Different rules apply when you are using social media on Aramark's behalf and when you are using it for personal reasons.

If you are authorized to use social media on Aramark's behalf, you must clearly identify yourself as an Aramark employee speaking on the company's behalf. When using social media for personal reasons, you may not represent or suggest that your posts are approved, sponsored, or authorized by Aramark, or that you are speaking on behalf of Aramark or any Aramark client or affiliate.

In addition, make sure you comply with all Aramark policies that might apply to your postings and be careful to protect Aramark's confidential and/or proprietary information, as well as the confidential and/or proprietary information of Aramark's clients, customers, and suppliers. Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the ***Social Networking Policy*** for additional guidance.

**Q:** Ted, a district manager, is frustrated by the outcome of a recent meeting with a client. Later that day, he logs onto Twitter to vent about the meeting. Because Ted is using his personal account and does not directly name his client, he believes that his actions are appropriate. Is he right?

**A:** No. Ted's use of his personal Twitter account to discuss client meetings could violate the Social Networking Policy if Ted does not make clear that he is speaking on his own behalf and not on behalf of Aramark. In addition, if Ted's tweets reveal any confidential and/or proprietary information belonging to Aramark or the client, this could be a violation of the Social Networking Policy.

## Copyright Infringement and Software Piracy

Aramark respects copyrights owned by others and permits the use of copyrighted materials only as allowed by law or through an agreement. You must never make copies, resell, or transfer software or its supporting documentation unless you are authorized to do so by the license agreement for that software. Contact your line of business attorney or Information Technology with any questions about copyright or software licensing.

## Privacy and Confidentiality

As part of your Aramark job responsibilities, you may be given access to non-public sensitive information. This includes individual consumer, medical, financial, and other personal information that you might collect from, use, or maintain concerning our current, prospective, or former employees, customers, or other third parties in the course of business. If such information is entrusted to you as part of your employment with Aramark, you have an obligation and are required to safeguard this information regardless of its form (such as paper, electronic records, etc.).

Regardless of your role or position at Aramark, you must protect the privacy of non-public or proprietary information entrusted to you by Aramark or our suppliers, clients, and customers, except when disclosure is approved in advance by your line of business attorney. This includes non-public information that might be of use to competitors, or harmful to Aramark or our clients or customers if disclosed. Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the **Privacy Policy** for additional guidance.

**Q:** Loraine has an important client meeting in the morning to finalize the terms of a substantial new account. She is waiting in a crowded airport terminal for her flight to board when her cell phone rings. Her supervisor is calling to discuss key aspects of her presentation and to review their strategy for winning the business. How should Loraine respond?

**A:** Loraine should not review confidential documents or discuss confidential information in a public space. She should offer to call her supervisor back once she is in a location where they can have a private conversation.

## Records Management

Every Aramark employee has responsibility for properly managing the company's records. Aramark is required by law to save certain records because they are needed for operational, legal, financial, historical, or other purposes. Before disposing of Aramark records, please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the ***Records Management Policy***. The policy contains retention schedules for particular types of records.



aramark

## IN THIS SECTION

### **Responding to Government, Media, and Investor Inquiries**

Forward all external inquiries to the appropriate Aramark representative.

### **Political Contributions**

Use of corporate funds for political contributions must be approved in advance.

### **Engagement of Lobbyists**

Engagement of lobbyists must be approved in advance.

### **Public Disclosures**

Public disclosures must be full, fair, timely, accurate, and understandable.

## Responding to Government, Media, and Investor Inquiries

To ensure that we meet our legal obligations and that our responses are timely, complete, and accurate, Aramark channels external inquiries through authorized company representatives:

- All government requests or inquiries, including requests for interviews or access for government officials to Aramark facilities and documents, must be forwarded to your line of business attorney
- All media requests for a statement by or on behalf of Aramark must be promptly referred to Aramark Communications and Public Affairs. Only designated company spokespeople are authorized to speak for Aramark or manage the process involving others
- All requests from industry analysts or market researchers must be referred to the Investor Relations team ([InvestorRelations@aramark.com](mailto:InvestorRelations@aramark.com))

**Q:** James is a customer service specialist in a customer support center. He has just received a phone call from a reporter for a national magazine, asking him for information about how many customer orders are received each day. James is excited to be talking to a reporter, and he also thinks that this is an opportunity to help Aramark look good in the media. How should he handle the call?

**A:** James must decline to comment and refer the call to Aramark Communications and Public Affairs. Only designated spokespeople are authorized to speak to the media on behalf of Aramark.

## Political Contributions

United States laws strictly regulate corporate political contributions, including monetary contributions such as checks, loans, or the purchase of tickets to political fundraising events, as well as in-kind contributions, such as the donation of food and beverages, or the use of corporate facilities or personnel for a fundraising event. Laws in countries outside the U.S. can also impose restrictions. You must have prior written approval from your line of business attorney before using or committing to use corporate funds or assets or Aramark political action committee (PAC) funds to make a political contribution at the federal, state, or local level.

Pressuring employees to make political contributions is prohibited. Aramark will not reimburse any personal political contributions or expenditures, including monetary or in-kind contributions to a political candidate or committee.

Please visit [www.aramark.net/policy](http://www.aramark.net/policy) to review the ***Political Contributions Policy***, or contact your line of business attorney or Aramark Government Affairs Compliance for additional guidance.

## Engagement of Lobbyists

Written approval from Aramark Government Affairs Compliance and your line of business attorney is required prior to hiring or paying a lobbyist or other government affairs consultant to do any work on behalf of Aramark.

## Public Disclosures

All employees involved in Aramark's disclosure process are responsible for ensuring that filings and submissions with the Securities and Exchange Commission and other public communications are full, fair, timely, accurate, and understandable.



Aramark has established the following resources to help you with a potential issue or to report a possible violation of the BCP or applicable law. If you believe that you or another employee may have violated the BCP or an applicable law, rule, or regulation, it is your responsibility to promptly report the violation in one of the following ways.

Remember, no employee will be subject to retaliation or punishment for reporting a suspected violation of the BCP, provided that the report is made in good faith and with a reasonable belief that the information provided is true.



## Direct Contacts

### TELEPHONE

You may contact any of the following individuals with questions or concerns:

Vice President, Audit and Controls	215-238-3110
Vice President, Global Security	800-338-5641
Vice President, Compliance	215-238-3435
Business Conduct Policy Committee Secretary	215-413-8833

### MAIL

Send a letter addressed to any of the above or to the Audit and Corporate Practices Committee of the Board of Directors at Aramark corporate headquarters: **Aramark, 1101 Market Street, Philadelphia, Pennsylvania 19107.**

### EMAIL

Vice President, Audit and Controls	<a href="mailto:audit@aramark.com">audit@aramark.com</a>
Legal Department	<a href="mailto:legal@aramark.com">legal@aramark.com</a>

## Aramark Employee Hotline



(anonymously, if preferred)

### ONLINE

U.S. and Canada	<a href="http://www.aramarkhotline.com">www.aramarkhotline.com</a>
Outside the U.S. and Canada	<a href="http://www.aramarkinternationalhotline.com">www.aramarkinternationalhotline.com</a>

### TELEPHONE (North America)

U.S. and Canada	1-877-224-0411
Mexico	001-877-417-2683

### TELEPHONE (Outside North America)

From outside North America, you may visit the Aramark Global Security website at [www.aramark.net](http://www.aramark.net) to obtain the access phone number for your country. After dialing that access number, when you hear instructions in English to dial the number you are calling, enter the number **877-224-0411**.

## **WAIVER**

In certain limited situations, Aramark may waive application of the BCP to employees, officers, or directors. With respect to executive officers and directors, any such waiver requires the express approval of the Board of Directors or the Audit and Corporate Practices Committee of the Board of Directors and will be promptly disclosed as required by law. With regard to Aramark employees other than executive officers and directors, waivers require the approval of the General Counsel's office.



*Deliver experiences that enrich and nourish lives*

