Business Conduct Policy



August 2026

Dear Colleagues,

At Aramark, our vision is to be the most admired employer and trusted hospitality partner. The trust that our employees, clients, and customers place in us is fundamental to our reputation and the long-term success of our business.

The Business Conduct Policy (BCP) codifies our commitment to earning that trust and helps guide us in doing everything with integrity wherever we operate in the world. The BCP applies to all of us—including employees, senior leaders, our board of directors, and anyone acting on Aramark's behalf. Every one of us is responsible for protecting Aramark's integrity and reputation.

Thank you for taking the time to read the BCP and for your commitment to complying with the BCP and acting with integrity every day. Working together, we will continue to do great things for our people, our partners, our communities, and the planet.

Thank you!



John Zillmer,
Aramark CEO

OUR VISION

Our vision is to be the most admired employer and trusted hospitality partner.

OUR MISSION

Because we're rooted in service, we do great things for our people, our partners, our communities, and our planet.

OUR VALUES

We do everything with integrity.

We deliver on our commitments.

We respect diversity and appreciate differences.

We're passionate about everything we do.

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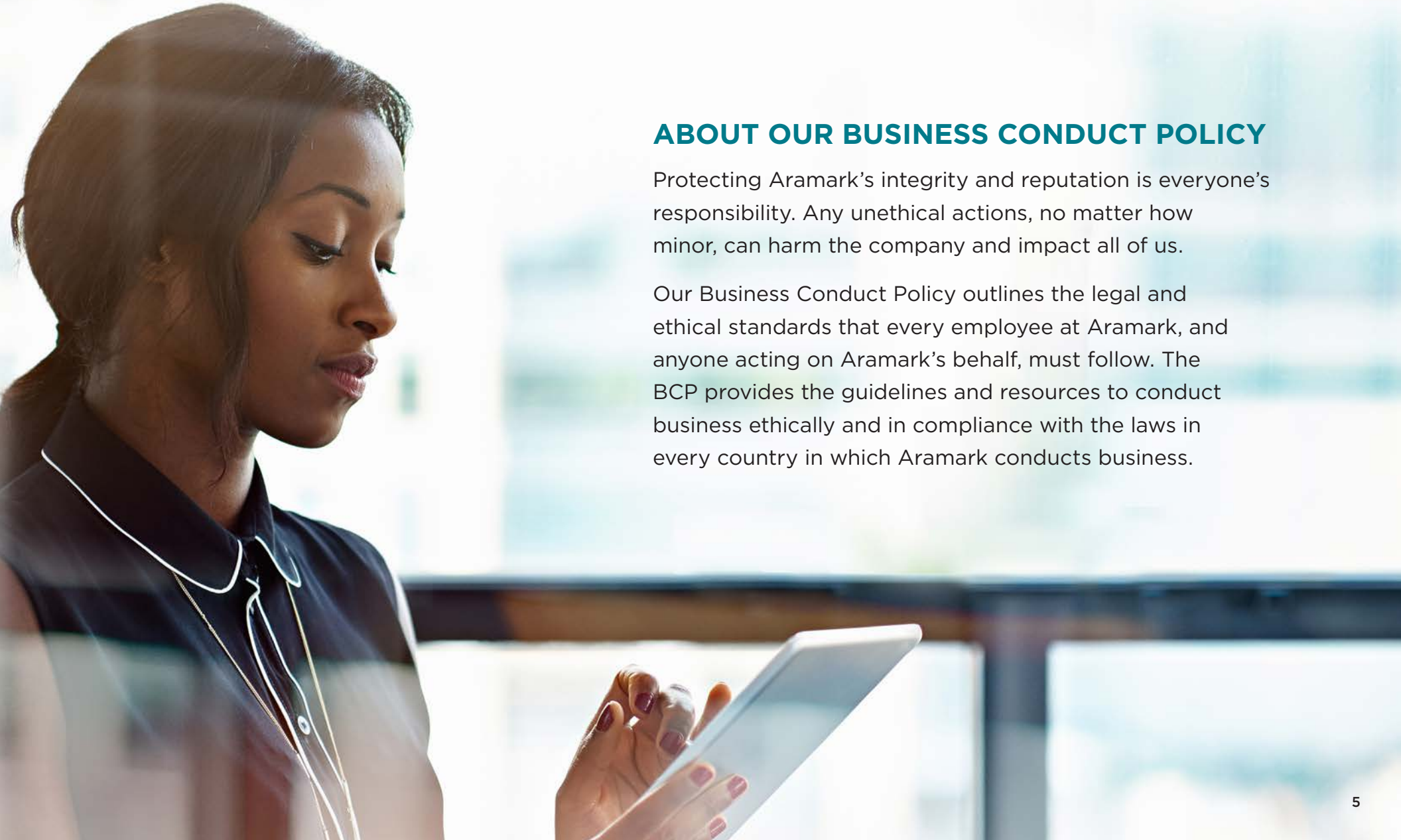
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RESOURCES FOR VOICING QUESTIONS OR CONCERNS

- Aramark Hotline Information—U.S. and Canada, International
- Aramark Audit and Controls Department Email Information and Legal Department Email Information
- Audit Committee Mailing Address

Please visit www.aramark.com/policy or myAramark for the most up-to-date version of the Business Conduct Policy and supporting policies.

Introduction to the Business Conduct Policy



ABOUT OUR BUSINESS CONDUCT POLICY

Protecting Aramark's integrity and reputation is everyone's responsibility. Any unethical actions, no matter how minor, can harm the company and impact all of us.

Our Business Conduct Policy outlines the legal and ethical standards that every employee at Aramark, and anyone acting on Aramark's behalf, must follow. The BCP provides the guidelines and resources to conduct business ethically and in compliance with the laws in every country in which Aramark conducts business.

THE BCP APPLIES TO EVERYONE

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.

AT ARAMARK, we hold our suppliers, vendors, contractors, and consultants to the same standards to which we hold ourselves. They must comply with the principles in our Supplier Code of Conduct as a condition of doing business with us.

THOSE WHO FAIL TO COMPLY with the BCP, fail to disclose suspected violations, fail to cooperate with an investigation of a possible violation, or knowingly make a false report may be subject to disciplinary action up to and including termination of employment. Aramark's Global Ethics and Compliance team, led by our chief compliance officer, has primary responsibility for promoting, monitoring, and enforcing ethics and compliance at Aramark, including any violation of the BCP. The team accomplishes this through training, policies, and processes designed to foster an ethical culture and protect against the risk of noncompliance.













COMPLIANCE WITH THE LAWS

It is Aramark policy to comply with the laws in each country, state, and locality in which Aramark conducts business. This includes, but is not limited to, compliance with employment, labor, and workplace rules; data privacy, cybersecurity, environmental, antitrust, gifts and entertainment, and securities laws; and the United States Foreign Corrupt Practices Act, UK Anti-Bribery Act, and other anti-corruption/anti-bribery laws. Every Aramark employee and any person or entity acting on Aramark's behalf must 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, or even the appearance of a violation, you must report the incident. Raise your concerns promptly, because the longer we wait to address the concern, the more serious the situation may become. Potential BCP violations can be reported through the following channels:

1. Your Manager
2. Another Manager
3. Human Resources
4. The Aramark Hotline
5. Email to Audit and Controls Department or Legal Department
6. Letter to the Audit Committee of the Board of Directors

The Aramark Hotline is operated by a third-party company, allowing anyone to raise any concerns. Reports can be made anonymously, either online or by phone. The hotline is available 24/7 and translation services are available.

Scan this QR code to connect to the Aramark Hotline page.

Scan this QR code to connect to the International Aramark Hotline page.

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.

INVESTIGATION PROCESS AND WHISTLEBLOWER PROTECTION

Speak up about any situation that you believe is inconsistent with the BCP or any law. Aramark prohibits retaliation.

Once a potential BCP violation is reported, it is investigated, and when a concern is validated, appropriate action is taken.

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. Retaliation is grounds for disciplinary action up to and including termination of employment.

Aramark will investigate and take claims of retaliation seriously.

INVESTIGATION COOPERATION

Aramark employees are required to cooperate with the company in connection with any inquiry or investigation of an alleged violation of the law, the BCP, or any Aramark policies. Such obligation includes, but is not limited to, providing access to all company information records, documents, data, and other property (including all email correspondence) that is in the employee's possession, custody, or control. Failure to cooperate with the company in connection with any inquiry or investigation is a violation of this policy and can be grounds for disciplinary action, including termination.





Our Commitment to People

HUMAN RIGHTS

All of our work to support people is underpinned by our values and our commitment to human rights as set out in the Universal Declaration of Human Rights and in line with the UN Guiding Principles on Business and Human Rights. Review Aramark's Human Rights Statement to learn more.

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.

WAGE AND HOUR

Aramark is committed to ensuring that all employees are properly paid for all of their working time and that their wages and work schedules comply with all applicable laws.

All employees are responsible for ensuring compliance with applicable wage and hour laws and Aramark's wage and hour policies.

EMPLOYEE DATA PRIVACY

Aramark respects an individual's right to data privacy. When we process an individual's data, it is managed securely and lawfully.

Please visit www.aramark.com/policy to review our policies relating to people.







WORKPLACE VIOLENCE

Aramark is committed to maintaining a safe, nonthreatening, and productive work environment for all employees. Violence, threats of violence, intimidation, or other threatening or hostile conduct toward Aramark employees or property, or against people 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 Aramark Hotline.

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, including 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.





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 characteristics 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 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.

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.

Return to TOC

HARASSMENT

What would you do?

Q: **Janet is a district manager. One of Janet's best managers, Phillip, has been dealing with an important client for the past several months. The client uses a racially insensitive nickname when he speaks with Phillip. Phillip doesn't think that the client realizes how offensive this is. He tells Janet about the client's behavior. Janet has never been in this situation before. What should she do?**

A: *Janet should thank Philip for raising the issue. Aramark needs to address the situation, but Janet will need help. She must reach out to Human Resources and/or her manager and report the situation to ensure it is promptly addressed.*



WORKPLACE RELATIONSHIPS

Aramark discourages dating or intimate relationships between managers or supervisors and their subordinates. 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 taken to end the reporting relationship. Even if the relationship is consensual 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.

Anyone failing to report a dating or intimate relationship with a subordinate is subject to disciplinary action up to and including termination of employment.







WORKPLACE SAFETY

We must conduct business operations in a manner that protects people and planet, and in compliance with all applicable environmental, health, and safety laws in all the countries in which we conduct business.

To maintain a safe and healthy workplace and to protect the environment, everyone is responsible for following all environmental, health, and safety rules, policies, and practices, and for promptly reporting all accidents, violations, hazardous material spills, injuries, and any unsafe equipment, practices, or conditions.

The following must be promptly reported:

- Accidents
- Violations
- Hazardous material spills
- Injuries
- Inquiries from government agencies

If you have any questions about workplace safety or your specific responsibilities, contact the Safety team for further guidance.

WORKPLACE SAFETY

What would you do?

Q: Victor, a front-line manager, asks an employee to clean up an overcrowded supply closet. While organizing the closet, the employee finds several containers of a 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 Safety Data Sheet (SDS) contain this information, along with proper handling guidance. He should then contact the Safety team to identify approved waste disposal vendors.*









Our Business Practices and Standards

CONFLICTS OF INTEREST

Our Conflicts of Interest Policy requires you to avoid any situation that creates a real or perceived conflict of interest. Conflicts can occur when the personal interests, activities, or investments of you or your family members, a romantic partner, or a close personal relationship could affect, or even appear to affect, your decision-making or the decision-making of others.

A conflict of interest is not necessarily a BCP violation, but failing to disclose it is. If you think you may have a conflict of interest, or if you are aware of a potential conflict of interest involving you or another employee, immediately disclose the situation to your manager so that it can be evaluated. If you have any conflict of interest questions, contact your line of business attorney.

A conflict of interest may arise if you, a family member, a romantic partner, or a close personal relation:

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

Significant conflicts may require reassignment of roles, withdrawal from a business decision, 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 Committee of the Board of Directors.

Please visit www.aramark.com/policy to review the Conflicts of Interest Policy.

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 who shares your home. Keep in mind that potential conflicts are not limited to just relationships with relatives or family members. Conflicts of interest also may arise with anyone with whom you have a romantic relationship or close personal relationship.

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 10% or more*
- *Any trust in which the Aramark employee has a substantial interest or serves as a trustee or in a similar fiduciary capacity*
- *Any family member of the Aramark employee who may significantly influence or be influenced by a business transaction with an organization of which they are an officer, director, or partner*



CORPORATE OPPORTUNITIES

You may never use Aramark property, information, or your position for 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. 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 Committee of the Board of Directors. For all other employees, such consent must be obtained from the General Counsel's office.

Return to TOC

CONFLICTS OF INTEREST

What would you do?

SCENARIO 1

Q: Michelle is a food service director. 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.*

SCENARIO 2

Q: Raj is a sourcing manager responsible for finding suppliers and negotiating prices with new suppliers. Raj's partner was recently offered a job at a new supplier with which Raj is currently negotiating a contract and prices. What should Raj do?

A: *Raj should inform his manager and should contact the attorney supporting his team. The fact that the supplier is offering Raj's partner a job while Raj is negotiating a new contract and prices raises a potential conflict of interest. It might not impact Raj's work, but some might ask why his partner is being offered a job now and it might raise questions about whether this could impact Raj's negotiations. It might be okay for Raj's partner to take the job, but an Aramark attorney should evaluate the potential conflict and Raj might need to be removed from work on this particular contract.*

ANTI-BRIBERY AND CORRUPTION

Aramark prohibits corruption or bribery of any kind and seeks to prevent even the appearance of improper influence. 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, and Aramark prohibits any payment to anyone who may influence a business decision. Numerous laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, prohibit direct and/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 the party complies with the requirements of the BCP.

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

Please visit www.aramark.com/policy to review the Anti-Corruption Policy and 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, political parties, party officials, and candidates for public office.

ANTI-BRIBERY

What would you do?

SCENARIO 1

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 says that he has a contact within the client to help him secure the business. The consultant's services will cost $20,000, and $5,000 of those funds will go to the consultant's contact within the prospective client's procurement office. Greg is told "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 the Aramark Legal Department.*

SCENARIO 2

Q: Ming, a manager, is eager 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 contact her Aramark attorney for guidance before moving forward with the licensing process.*

GIFTS AND ENTERTAINMENT

Providing gifts or entertainment to clients or suppliers or accepting gifts or entertainment from clients or suppliers can create the appearance of a conflict of interest. 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 or violate the law.

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 provide or receive a gift or entertainment to or from a client, potential client, supplier, or government official.

MONEY LAUNDERING

Money laundering is the process of concealing illicit funds or making them look as though they are legitimate. This includes concealing the criminal origin of money or other property—sometimes called the proceeds of crime—within legitimate business activities. It also covers the use of legitimate funds to support criminal activities, including sanctions violations and terrorism. Money laundering and the financing of illegal activities are criminal acts. Anyone engaging in such activity is subject to appropriate legal action and discipline up to and including termination.



GIFTS AND ENTERTAINMENT & CHARITABLE CONTRIBUTIONS

What would you do?

Q: **Tomika is an Aramark manager at a hospital. Tomika's client informs her that the hospital works closely with Fans for Youth, a charitable organization that supports underserved youth in the local community. Fans for Youth is having a golf tournament to raise money to support its mission and the hospital is a sponsor. The client asks Tomika if Aramark would co-sponsor the event and says that, as a co-sponsor, Aramark would be able to have four employees participate in the tournament.**

Tomika thinks it would be great to show the client that Aramark is committed to serving the local community and having a foursome in the tournament would help gain face time with the client. Tomika also knows that the wife of the executive director of the hospital is on the board of directors of Fans for Youth and Tomika thinks the executive director would appreciate Aramark's support, too. Can Tomika immediately agree to Aramark being a co-sponsor?

A: *Tomika should not immediately agree but should tell the client that she will need to seek approval. Support of charitable organizations is permissible but requests to support them must be submitted through Aramark's charitable contributions portal in the United States and to the attorney responsible for your business outside of the United States. The fact that a family member of a possible decision-maker for the client is on the board of the charity also may raise a concern. Tomika should disclose this fact when seeking approval.*



ACCURATE BOOKS AND REPORTING

We must 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 through deliberate omission, or by creating records without knowledge of their accuracy. 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 anyone including Aramark Global Security, the Aramark Legal Department, Aramark's Audit and Controls Department, or our independent auditors.

You may make a good faith complaint regarding accounting, internal accounting controls, or auditing matters by following the procedures outlined in the "Take Action! Raise Concerns and Report Suspected BCP Violations" section of the BCP.

ACCURATE BOOKS AND REPORTING

What would you do?

SCENARIO 1

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 this 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.*

SCENARIO 2

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, COLLUSION, AND UNFAIR COMPETITION

All employees and representatives must comply with laws that prohibit unfair business practices and promote vigorous competition that is free from collusion.

PRICE-FIXING/RESTRICTING COMPETITION/ RESALE PRICE MAINTENANCE

- Antitrust laws forbid competitors from colluding to fix prices or restrict competition, as well as from agreeing not to compete in certain areas/businesses. Even the mere discussion of these topics with competitors can be problematic and pose substantial legal risk.
- Similarly, each separate entity in a distribution chain must be free to set resale prices independently and according to prevailing market conditions at that level. We must not take any action that fosters, directly or indirectly, the unlawful exercise of control over resale prices.

PREDATORY PRICING

- Motivation is key. We can lower prices in an effort to stimulate business but cannot do so with an intent to drive a competitor out of business.

CONFERENCES AND TRADE SHOWS

You should be especially cautious when attending conferences, trade shows, or other meetings where you may have contact with competitors to avoid even the appearance of unfair business practices. If topics related to current or potential clients are mentioned at any meeting with any competitor, you must remove yourself from the situation immediately and report the incident to your line of business attorney. Areas of concern include but are not limited to pricing, bidding, territorial or customer allocation, or refusal to deal.

Violation of antitrust laws can carry substantial legal consequences, including potential criminal repercussions, for both Aramark and the individual employee.

QUESTIONNAIRES

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





FOUR KEY TAKEAWAYS

YOU MUST NEVER

1. **DISCUSS OR AGREE WITH A COMPETITOR** on anything related to the terms and conditions of sales or services to customers, such as prices, discounts, or warranties.

2. **COORDINATE BIDS WITH A COMPETITOR**, including agreeing 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.

3. **DIVIDE OR ASSIGN SALES TERRITORIES,** customer services, or product lines with a competitor.

4. **PARTICIPATE IN ANY REFUSAL** to deal with specific customers or suppliers.



ANTITRUST, COLLUSION, AND UNFAIR COMPETITION

What would you do?

SCENARIO 1

Q: Joel is submitting a bid for the local school district contract and has a friend who works at another company that is also competing for the business. Joel also has a contract at a nearby hospital that comes up for renewal in a few months that his friend was planning to bid on. Joel decides not to bid on the school district contract and will talk to his friend about not bidding on the hospital contract to return the favor. Is this okay?

A: *No. This is a violation of the BCP and a potential violation of antitrust and fair competition laws even though Joel did not talk to his friend to get an agreement. Joel could be subject to criminal prosecution for such action. Employees should avoid even the appearance of an agreement with competitors.*

SCENARIO 2

Q: Pedro is on a team preparing a bid for a contract with a stadium being operated by a local government agency. He is at a trade show and sees a friend who works for a competitor. Pedro's friend tells Pedro that his company is bidding on the stadium contract, too, and starts to tell Pedro about some aspects of his company's bid. What should Pedro do?

A: *Pedro should excuse himself from the conversation and seek guidance from his line of business attorney. Although Pedro did not share information about Aramark's bid with his friend, he learned information about a competitor's bid. Even if this does not impact Aramark's bid, if our bid is successful, it could lead to bid protests or allegations that Pedro's friend colluded with him.*

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 unfair dealing practice. You must deal fairly with customers, suppliers, competitors, and employees.

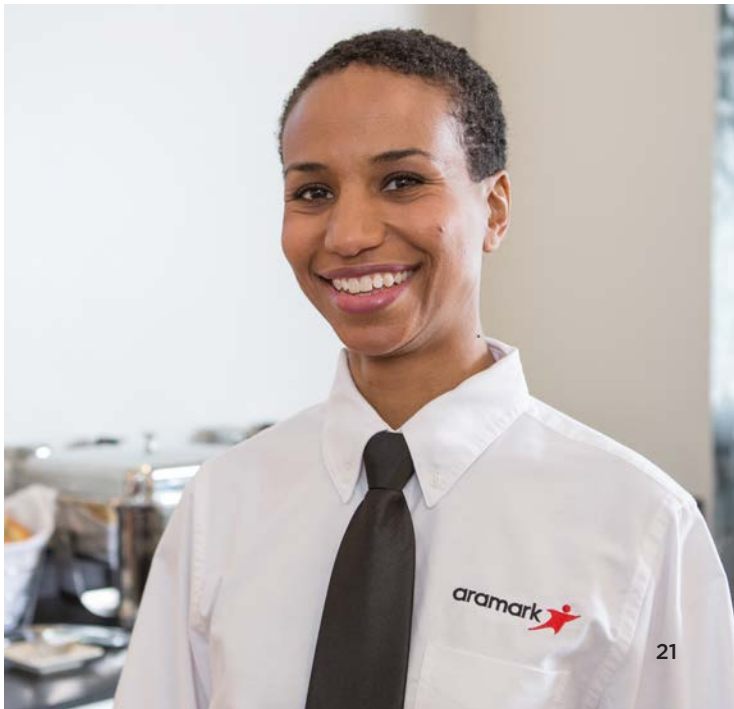
Federal and state laws prohibit unfair methods of competition as well as unfair or deceptive acts and practices.

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 or deceptive claims or comparisons regarding competitors or their services or products
- Mislabeling products or services
- Making affirmative claims concerning Aramark's products or services without a reasonable basis for doing so
- Calling a product "organic" or "sustainable" without confirming accuracy







INSIDER TRADING AND SECURITIES TRANSACTIONS

Insider trading is the act of buying or selling securities while in possession of material nonpublic information. During your employment at Aramark, you may possess nonpublic, 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 any company 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. You may not trade Aramark securities while in possession of material nonpublic information about Aramark.

The use of inside information for personal financial benefit, or providing information to others who may make an investment decision based on this information, is unethical and may be 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 for the individuals involved.

WHAT IS "MATERIAL NONPUBLIC INFORMATION"?

Material nonpublic information is any information that an investor would consider important in making a decision whether to buy, sell, or hold a security 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 prices of a security could be material.

INSIDER TRADING

What would you do?

SCENARIO 1

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.*

SCENARIO 2

Q: Shyla learns that Aramark is going to acquire a new company and Shyla thinks that this will be great for Aramark and her career. Aramark is going to announce the information at the end of the week. Shyla is very excited about the news and tells her friend about it before it is made public, but asks her friend not to tell anyone until it is official. Is this okay?

A: *No. Shyla knew something that had not been made public yet and sharing such information could be considered "tipping." She should not tell her friends or family about this before it is officially announced. Even though Shyla asked her friend not to tell anyone else, if Shyla's friend uses the information to make trading decisions or shares this information with others who trade on that information, this could result in an investigation and could subject Shyla to serious consequences, including criminal prosecution.*

Protecting Company Assets and Proprietary Information

COMPANY ASSETS

Our assets—including, but not limited to, cash, inventory, property, technology, 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 also must extend the 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 Hotline, or by following the procedures outlined in the "Take Action! Raise Concerns and Report Suspected BCP Violations" section of the BCP.

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

COMPANY ASSETS

What would you do?

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 or to the Aramark Hotline. He should do so without fear of retaliation and may report anonymously.*

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 and text messages created within 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, devices, or email is permitted as long as it is incidental and does not:

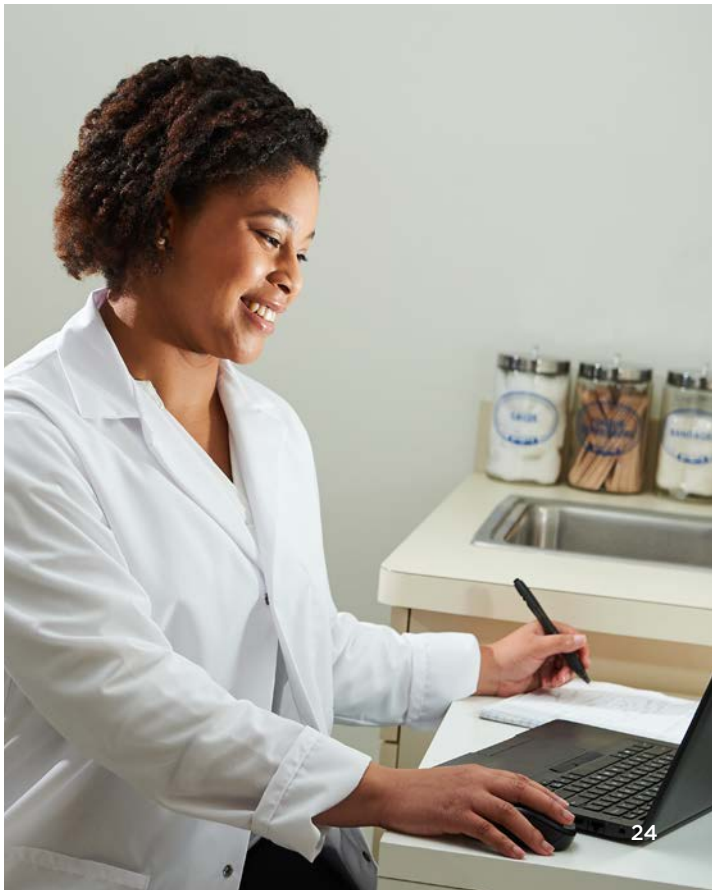
- Involve any prohibited activity
- Interfere with productivity
- Deplete system resources or storage capacity

You may never use your company equipment 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.com/policy to review the Global Acceptable Use Policy for additional guidance.







SOCIAL MEDIA

When using social media, blogs, discussion forums, online publishing, and user-generated media for business purposes and for personal reasons, all employees 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.

Only designated company spokespeople are authorized to speak for Aramark. 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, suppliers, and employees.

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, reproduce, 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 question about copyright or software licensing.

SOCIAL MEDIA

What would you do?

Q: Ted, a district manager, is frustrated by the outcome of a recent meeting with a client. Later that day, he logs on to social media 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 account to discuss client meetings could imply that Ted is acting on behalf of Aramark, could violate the Social Networking Policy, and could harm our client relationship. In addition, if Ted's posts reveal any confidential and/or proprietary information belonging to Aramark or the client, this could be a violation of the Social Networking Policy.*



INFORMATION SECURITY

As part of your role or relationship with Aramark, you may have access to nonpublic or proprietary, 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 clients, employees, customers, or other third parties in the course of business. If you have access to such information, you must safeguard this information regardless of its form (such as paper and electronic records) and comply with all applicable cybersecurity and data privacy laws and policies.

You must not disclose any such information without prior approval from your line of business attorney.

RECORDS MANAGEMENT

Everyone 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. You must follow Aramark policy regarding retention schedules for particular types of records.

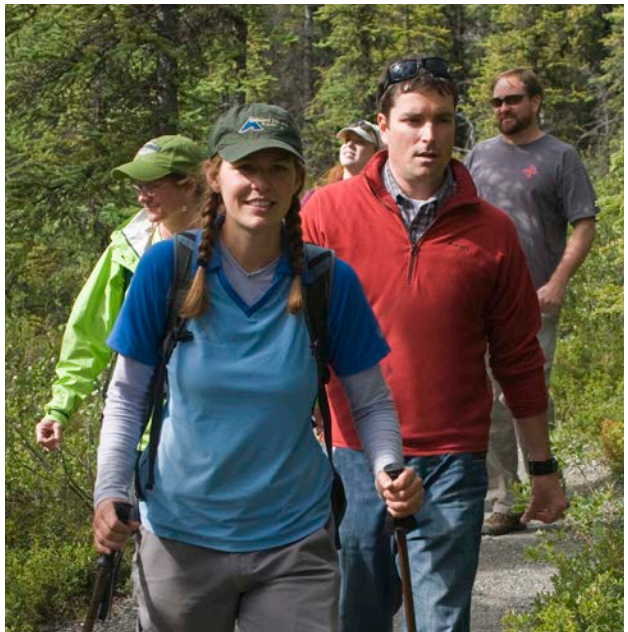
Please visit www.aramark.com/policy to review policies relating to Information Security and Records Management.

INFORMATION SECURITY

What would you do?

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 supervisor calls to discuss key aspects of her presentation and to review their strategy for winning the business. How should Loraine respond?

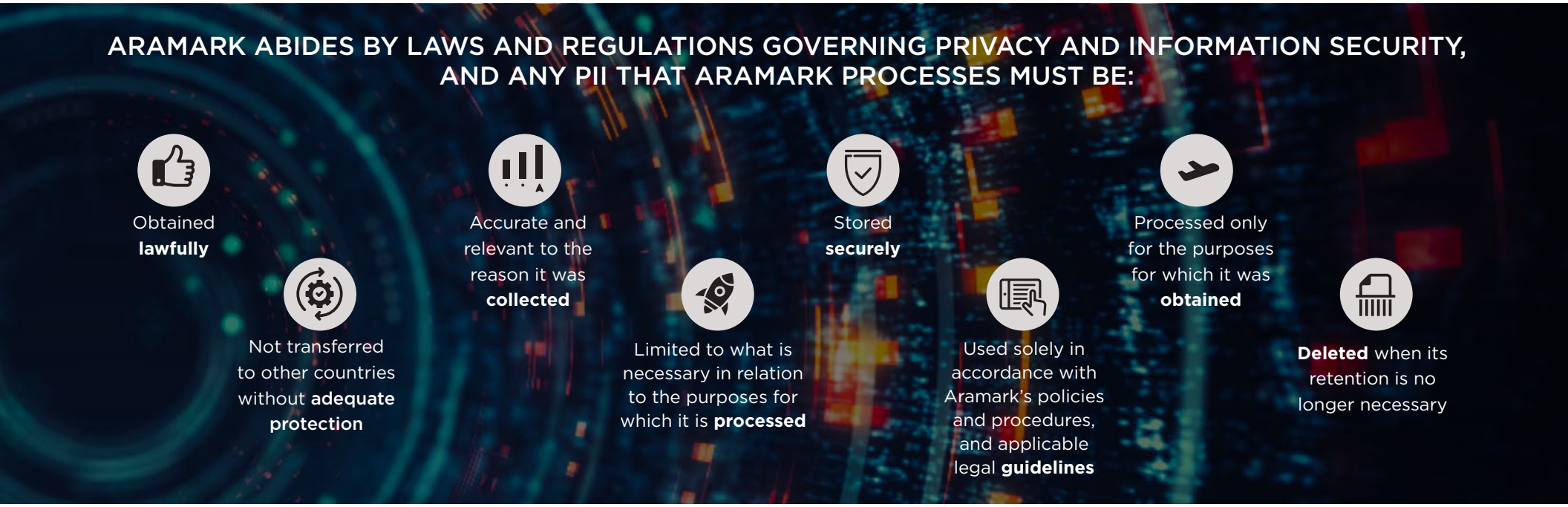
A: *Because Loraine is in a public location, she must take steps to ensure that others are not able to learn about Aramark's confidential information. She should move to a quieter space where others cannot hear, speak in a way that does not disclose confidential information, and/or offer to call her supervisor back when she is better able to have a private conversation.*





DATA PRIVACY

Aramark offers a broad range of services designed to suit the diverse and ever-changing needs of our clients. In order to perform and tailor our services, we collect certain personally identifiable information (PII). PII is any information that can be linked to a person, whether held in paper files or electronically. Aramark is committed to respecting the privacy of our clients, employees, customers, and other third parties, and takes appropriate steps to protect such PII at all times.



EVERYONE IS ACCOUNTABLE FOR PROTECTING PII. ALWAYS REMEMBER:

- Access PII only in accordance with Aramark's policies, if you are authorized to do so, and only for business purposes.
- Do not provide PII data to unauthorized people in or outside of Aramark unless you have the necessary approvals and agreements in place. Reach out to your line of business attorney if you have any questions or concerns.
- Always ensure that PII is stored securely and with restricted access.

If you suspect that PII has been breached or used in a way that violates Aramark's policies or applicable law, report it immediately to the Privacy team at privacy@aramark.com.

Please note that country-specific policies also may apply. If you have questions, contact your line of business attorney.

Please visit www.aramark.com/policy to review applicable data privacy and information security policies.

Our Interaction with the Planet, the Public, and the Government



SUSTAINABILITY BEGINS WITH INTEGRITY.

We are committed to doing the right thing and doing great things for our people, our partners, our communities, and our planet. Our stakeholders—clients, consumers, and investors—expect our company to prioritize sustainability as a key foundation to business success.



SUSTAINABILITY

Be Well. Do Well. is our sustainability plan and directly connects to our mission. Everyone is expected to conduct business with accuracy and integrity.

BE ACCURATE AND TRUTHFUL IN HOW WE COMMUNICATE OUR SUSTAINABILITY GOALS

BE ACCURATE AND TRUTHFUL IN HOW WE REPORT OUR PERFORMANCE

LEARN ABOUT OUR PROGRAMS AND SEEK SUPPORT AS NEEDED

Return to TOC

SUSTAINABILITY

What would you do?

Q: **Sam, a director of strategic development, is asked about Aramark's approach to reducing greenhouse gas emissions in the final stages of securing a multi-million-dollar contract with a new corporate client. The client's representative wants to confirm that Aramark shares its commitment to reducing carbon emissions and requests that Aramark sign a "net zero emissions" pledge as the final step to completing the deal. Should Sam sign the pledge on Aramark's behalf?**

A: *Not yet. Aramark is committed to reducing greenhouse emissions and is setting ambitious goals for doing so, as summarized in our Be Well. Do Well. Impact Report. However, while we are excited to partner with our clients in efforts to minimize emissions, signing the pledge without further internal review and consultation would be premature, inappropriate, and a violation of the BCP. Sam should instead respectfully request some time to review the pledge and engage the Enterprise Sustainability team or his line of business attorney. That will allow for a review of the pledge and confirmation that it aligns with Aramark's goals and that we are otherwise in a position to make the commitment.*



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 subpoenas, requests for interviews or access for government officials to Aramark facilities and documents, must be forwarded to your line of business attorney immediately.
- 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 at **investorrelations@aramark.com**.

Return to TOC

RESPONDING TO MEDIA INQUIRIES

What would you do?

SCENARIO 1

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 Communication and Public Affairs. Only designated company spokespeople are authorized to speak to the media on behalf of Aramark.*

SCENARIO 2

Q: Alejandra is a chef at a university. A student from the school newspaper reached out to Alejandra for an interview about the university food program, asking her for information about Aramark's operations. Alejandra is excited to help the student and wants to be supportive of the university's paper. She also thinks that this is an opportunity to help Aramark look good in the media. How should she handle the outreach?

A: *Alejandra must decline to comment and refer the call to Aramark Communication 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 of 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.

COMMUNITY AND CHARITABLE GIFTS

At Aramark, we do great things for the communities in which we serve. All charitable contributions in the U.S. must be made to established 501(c)(3) nonprofit organizations and must be approved before any commitment is made as outlined in the Charitable Gifts and Contributions Policy. For charitable contributions outside of the U.S., you must seek prior approval from the appropriate line of business attorney. Charitable donations may not be made to influence business decisions and may not be made in a manner that could be or could create the appearance of being a bribe, kickback, or other corrupt practice.

Please visit www.aramark.com/policy to review the Political Contributions Policy and the Charitable Gifts and Contributions Policy. For additional guidance, contact your line of business attorney or Aramark Government Affairs Compliance at gacompliance@aramark.com.

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.





Resources for Voicing Questions or Concerns

WE WANT TO HEAR FROM YOU

Aramark Hotline (United States and Canada)

- 1-877-224-0411 or *www.aramarkhotline.com*
- You can also scan the QR code to be taken to the online submission page.

Aramark Hotline (International)

- *www.aramarkinternationalhotline.com* for locations outside North America

If you see someone breaking the rules in the BCP, or you feel pressured into breaking a rule yourself, you must tell someone.

You can tell your manager, another manager, or Human Resources, or call the Aramark Hotline.

Anyone can call the hotline:

- Call any time of the day or night.
- Give as much information as you can so your issue can be investigated.
- You can remain anonymous if you wish.
- All languages are welcome.

Country	Phone Number
Argentina	0800-800-1408
Belgium	0800-70-815
Chile	123-0020-0208
China—North	10-800-714-2789
China—South	10-800-140-2809
Czech Republic	800-022-801
Denmark	8025-3818
France	0-800-90-7066
Germany	0-800-505-3089

Country	Phone Number
Ireland	1-800-949241
Luxembourg	800-2-6304
Mexico	1-800-062-7337
Saudi Arabia	800814-1358
South Korea	00798-142038196
Spain	800-65-4403
United Arab Emirates	800-017-8147
United Kingdom	0-800-029-1845

For a complete copy of all the rules in the BCP in your language, go to *www.aramark.com/policy*.

Do not be afraid to speak up. Aramark prohibits retaliation. You will not get in trouble for making a report as long as you truly believe there is a violation of the BCP or the law.

EMAIL	
Audit and Controls Department	audit@aramark.com
Legal Department	legal@aramark.com
MAIL	
Send a letter addressed to any of the above or to the Audit Committee of the Board of Directors at Aramark corporate headquarters.	Aramark 2400 Market Street Philadelphia, PA 19103

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 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.


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