



# CODE OF BUSINESS CONDUCT AND ETHICS



# MESSAGE FROM THE PRESIDENT AND CHIEF EXECUTIVE OFFICER

At Rollins, our core values are: “Continuous Improvement,” “Do the Right Thing,” “Service,” “Accountability,” and “Collaboration.” In accordance with our core values, we want our employees to feel supported in making the right decisions and living by high ethical and business standards. As our Winning Tradition says, “The number one contributor to our Company’s success is the quality of our people.” We have great people and we want to help you make great decisions.

This Code of Business Conduct and Ethics (the “Code”) is your personal guide to help you navigate everyday ethical situations and questions you may encounter while working as an employee at Rollins or one of our many brands or subsidiaries (collectively, the “Company”). Keep in mind that this Code cannot cover every possible situation that you may encounter at work so always exercise good judgment and never hesitate to ask for help.

The Code, along with our policies and procedures, sets forth our Company’s standards and applies to all of us: officers, directors, management, and employees. This means that all supervisory and management personnel, including our officers and directors, are expected to lead according to the principles set forth in the Code in both words and actions.

The Code plays the important role of outlining the responsibilities we have to the Company, our customers, and our fellow employees. The Code also outlines our responsibilities as employees to comply with a number of laws and policies, and places those obligations within the context of our values and commitment to conducting business with integrity.

Our founder, O. Wayne Rollins, once said, “A good understanding prevents a misunderstanding.” In that spirit, please familiarize yourself with the Code and all policies applicable to your job so you can Do the Right Thing. Feel free to use the channels provided in the Code to ask questions and report concerns. If you do not escalate your questions or concerns to the right person, it remains your problem, but if you seek help,

it becomes our problem. Our Code can help you make the right decisions, and our support network can take the weight off your shoulders.

Thank you so much for all you do to maintain our Winning Tradition and contribute to our mission to become the best service company in the world.



**Jerry Gahlhoff, Jr.**  
**President and Chief Executive Officer**

# TABLE OF CONTENTS

ABOUT THIS CODE OF BUSINESS CONDUCT .....	1
COMPETITION (ANTITRUST LAWS) .....	3
BUSINESS ACCOUNTING PRACTICES .....	4
CONFLICTS OF INTEREST .....	5
CUSTOMER, SUPPLIER, AND COMPETITOR RELATIONS .....	7
ENVIRONMENT, HEALTH, AND SAFETY .....	8
FAIR EMPLOYMENT PRACTICES .....	9
CONTROLLED SUBSTANCE AND ALCOHOL POLICY .....	11
WORKPLACE VIOLENCE PREVENTION .....	12
TRADING IN STOCK .....	14
BRIBES AND IMPROPER CONDUCT .....	15
POLITICAL CONTRIBUTIONS AND POLITICAL ACTIVITY .....	16
PROTECTING COMPANY ASSETS .....	17
PROTECTING CONFIDENTIAL INFORMATION .....	19
COMPLIANCE WITH THIS CODE .....	21
COMPLAINTS CONCERNING ACCOUNTING, FINANCIAL REPORTING, INTERNAL AUDITING CONTROLS, OR AUDITING MATTERS .....	23

CODE OF BUSINESS CONDUCT ACKNOWLEDGEMENT FORM .....25

COMPLAINT FORM ..... 26



# ABOUT THIS CODE OF BUSINESS CONDUCT AND ETHICS



*This Code outlines considerations applicable to situations most likely to be encountered by employees as they conduct the Company's business. It applies to all officers, directors, management, and employees of the Company.*

You are expected to comply with this Code and all applicable laws, rules, and regulations. Company operations and Company employees are subject to the laws of many countries and other jurisdictions around the world. If a provision of the Code conflicts with applicable law, the law controls.

No company could hope to specify responses to the numerous issues that impact its employees every day in countless business situations. This Code does not try to do that. Rather, it is intended as a guide to those uniformly applicable standards of integrity in business conduct which we as a Company strive to perfect. The purpose of this or any business conduct code is to foster a working environment in which the Company's expectations and requirements are routinely exceeded by committed employees in the course of performing their daily responsibilities.

This Code covers situations you are most likely to encounter at one time or another as you conduct the Company's business. This Code, our corporate policies and procedures, and federal, state, and local laws are all part of our effort to allow you to make the right choices and to Do the Right Thing. The Company policies can be found on the Company's intranet site. Inevitably, situations will arise where no written guidance is available. In such cases, the best course is to contact your supervisor or your Human Resources representative, who has the responsibility to find the proper answers.

*It is important that you read and understand this Code. It applies to all officers, directors, management, and employees of the Company. All employees are responsible for escalating any incident or perceived inappropriate conduct to one of the following: their supervisor, senior management, or their Human Resources representative. Management personnel have the additional responsibility to communicate, carry out, and enforce the Code and Company policies and procedures. Supervisors are required to notify senior management and the appropriate Human Resources representative of any incident or perceived inappropriate conduct that is brought to their attention. You will be required to sign an acknowledgment form stating that you have read and understand the Code and intend to follow it.*





# COMPETITION (ANTITRUST LAWS)

*Antitrust laws are designed to regulate trade in order to preserve and promote honest business competition. The Company and you must comply with these laws and trade regulations. Violations can result in damage to the Company's reputation, significant fines to the Company, and prison terms for those persons involved.*

## KEY POINTS

### **Don't Agree to Restrain Trade**

Do not have conversations or make agreements with competitors to fix prices, rig bids, allocate markets or customers, restrain competition for employee hiring, boycott third parties, or limit the sale of any service or product.

### **Avoid Unnecessary Contact with Competitors**

Any contact with competitors, formal or informal, should be for accomplishing lawful and proper business objectives. Informal communications, including a handshake, a wink, or a casual conversation over coffee, can constitute an "agreement"; there are no "off the record" communications. Persons involved in trade associations or other situations allowing or facilitating communication among competitors, customers, or suppliers must be especially careful to avoid violating antitrust laws. If in doubt, contact the Legal Department.

### **Exercise Caution in Business Conduct**

Legal Department guidance should be sought when considering:

- Exclusive dealing arrangements (a purchaser doing all or most of its business with one supplier);
- Territorial or customer restrictions (restrictions on the territory in which we will operate, or on the customers for whom we compete);
- Tying or reciprocal arrangements (selling one good or service only on the condition that a customer purchase another good or service);
- Acquisitions of companies and joint ventures;
- Pricing below cost, or pricing without reference to costs or market conditions; or
- Comparative advertising or any mention of a competitor that's unfair, deceptive, misleading, or false.

## Follow the Basic Don'ts of Antitrust

1. Don't ever discuss prices with competitors.
2. Don't agree with competitors to restrict the output of goods or services.
3. Don't divide groups of customers, markets, or territories with competitors.
4. Don't agree with competitors not to poach employees or not to compete in the hiring or retention of employees.
5. Don't require a customer to buy products or services only from the Company without consulting the Company's legal counsel.
6. Don't agree with competitors to boycott suppliers or customers.
7. Don't discriminate in pricing unless justified by cost savings, the need to meet competition, or changed market conditions.
8. Don't prepare documents or make presentations without considering the antitrust implications.
9. Don't delay in reporting any suspected violation of this policy or the antitrust laws, but instead report it promptly to the Company's Business Conduct Reportline.

# BUSINESS ACCOUNTING PRACTICES

*Shareholders, governments, employees, customers, and suppliers rely upon the integrity and objectivity of our accounting and business records. These records must be maintained in a complete, accurate, and timely manner. Significant penalties may be imposed on the Company and involved persons for failure to maintain required business records and comply with accounting practices.*

## KEY POINTS

### Comply with Accounting Practices

Our books, records, and disclosures must be clear, complete and in compliance with accepted United States and other international localities accounting rules and controls. The Company's finance and accounting departments are responsible for establishing procedures designed to ensure proper internal and disclosure controls, but all of us contribute to the process of recording business results and maintaining records. Each of us is responsible for helping to ensure the information we record is accurate, complete, timely, and maintained in a manner that is consistent with our system of internal controls and cooperating with the following procedures:

- Create accounting and business records that accurately reflect the truth of the underlying event or transaction in the proper period. Record transactions as prescribed by our system of internal controls.
- Write carefully and clearly in all your business communications, including emails. Write

with the understanding that someday they may become public documents.

- Sign only documents – including contracts – you have reviewed, are authorized to sign, and believe are accurate and truthful.
- Do not record false sales or record them early, understate or overstate known liabilities and assets, or defer recording items that should be expensed.
- Retain, protect, and dispose of records according to our Records / Data Retention and Storage Policy. Records subject to legal hold notices, document preservation requests, or regulatory requirements may be subject to additional protections.

If you suspect any irregularity relating to the integrity of our records, you must report it immediately to your supervisor, the Legal Department, or others noted in the “Where to Report” section of this Code.

### **Put Company Money in Company Accounts**

Except for approved petty cash funds, all Company funds must be retained in properly authorized and identified Company accounts. The establishment and operation of unrecorded funds of cash or other assets, for any purpose, is prohibited.

### **Maintain Accurate Records of Travel and Business Expenses**

Records of reasonable and necessary out-of-pocket expenditures for business purposes that are incurred in the course and scope of your work, in accordance with Company policy, (such as transportation, lodging, and meals) should be maintained in an orderly fashion. Expense reports requesting reimbursement must be completed with accuracy and timely submitted, including all properly documented receipts.

### **Do Not Provide False or Inaccurate Information**

You are prohibited from making, or causing others to make, or deceiving others into making, false or inaccurate reports to government agencies or false or inaccurate entries into the books and records, financial or otherwise, of the Company.

## **CONFLICTS OF INTEREST**

*The Company respects your right to engage in personal activities. Care must be taken, however, to avoid situations that might conflict with your responsibilities to the Company, or with the interests of the Company and those with whom it does business.*

## KEY POINTS

### **Don't Use Company Time or Assets for Personal Activities**

You should not use, borrow, or loan Company assets or property, or use Company time for personal activities. The Company shall not lend money to executive officers or directors or otherwise extend credit in violation of Securities and Exchange Commission rules.

### **Avoid Conflicts of Interest**

You and members of your family (which include spouse/partner, children, siblings, parents, grandchildren, in-laws, step relatives and any persons living in the same household) should avoid conflicts of interest. Officers, directors, and employees, or members of their families, should not be employed by any competitor of the Company, or by any franchise granted by the Company, or have a significant financial interest in or provide services to any competitor of the Company. You or members of your family should not be employed by any customer or supplier with whom you (directly, indirectly, or through subordinates) conduct business on behalf of the Company or have a significant financial interest in or provide services to any such customer or supplier. You shall not conduct business (directly, indirectly, or through subordinates) on behalf of the Company with a member of your family.

While the Company does not maintain a strict policy that prohibits the employment of family members in all circumstances, the Company does place certain restrictions on family members working together. Restrictions are dependent on the positions of the employees involved and the surrounding business needs. You must notify your Human Resources representative if you become aware that a family member is applying for employment with, or becomes employed by, the Company in your department/business location or with anyone who reports to you.

Exceptions to these general principles may be granted pursuant to the Compliance with this Code – Waivers or Exceptions section set forth on page 23 of this Code.

### **Corporate Opportunities**

You owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. You shall not (a) take for yourself personally any opportunities that you discover through your position or through the use of Company property or information, or (b) compete with the Company.

### **Avoid the Appearance of a Conflict**

The appearance of a conflict of interest may exist, for example, if you or your family member has an investment interest in a customer or supplier of the Company. (The Company does not prohibit holding stock in publicly traded companies with which the Company does business.) You must disclose to your supervisor and the General Counsel all interests that may conflict with those

of the Company, even if you do not believe an actual conflict exists.

### **Don't Let Community Activities Conflict with Company Interests**

The Company encourages you to participate in your community. Such participation, however, carries with it the responsibility to avoid actual or apparent conflicts of interest. For example, using Company time or assets for community activities should not be done without prior authorization from your supervisor.

### **Yearly Certification**

Some of you will be required to complete a yearly questionnaire on business ethics and certify compliance with the Company's Code, policies, and procedures. Consult the Company's policies available on the Company's intranet site for additional information.

# **CUSTOMER, SUPPLIER, AND COMPETITOR RELATIONS**

*When dealing with or making decisions affecting customers, suppliers, or competitors, you must be careful not to inadvertently obligate the Company. In conducting business with these parties, employees are expected to always act fairly and objectively and in the best interests of the Company.*

## **KEY POINTS**

### **Don't Ask for or Accept Gifts, Favors, Entertainment, or Payments from Customers, Suppliers, or Competitors**

You may not accept gifts, favors, entertainment, or payments, which could be construed as an attempt to influence your business judgment, from customers, suppliers, competitors, or any other person doing business with or attempting to do business with the Company. Gifts of a nominal value may be accepted when clearly not intended to influence judgment, such as entertainment of not more than one-day duration (e.g., meals, sporting or theatrical events, golf) or gifts of a promotional nature displaying the business name of the donor with a retail value of less than \$99. Gifts received which are unacceptable under this Code must be returned to the donor or turned over to the Company through the Human Resources Department. If you are unsure about what to do, contact your Human Resources representative.

### **Refuse Loans, Personal Services, Privileges, and Trips**

Do not accept cash, loans, favors, or other personal services from customers, suppliers, or

competitors. Do not accept valuable privileges or vacations or pleasure trips without a business purpose.

### **Do Not Give or Receive Kickbacks**

A kickback is any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind which is provided for the purpose of improperly obtaining or rewarding favorable treatment. Kickbacks are not to be given or accepted in any form under any circumstances.

### **Exceptions**

Exceptions to these rules, excluding kickbacks that are never able to be waived, must be approved by the General Counsel of the Company. Please refer to the “Compliance with this Code – Waivers or Exceptions” section set forth on page 23 of this Code.

# **ENVIRONMENT, HEALTH, AND SAFETY**

*The Company is committed to conducting its business in an environmentally sound and responsible manner and providing a safe and healthy workplace for its employees and the public. The Company must comply with various environmental, health, and safety laws and regulations – not only because failure to do so can result in substantial penalties (heavy fines for the Company and fines and imprisonment for employees responsible for violations), but because it is our social responsibility to help protect the environment and the health and safety of our employees, customers, and the public.*

## **KEY POINTS**

### **Know the Law**

You have an obligation to learn and comply with all environmental, occupational health, and safety laws and regulations applicable to your work. If you are uncertain about laws and regulations concerning your job, contact your supervisor. Supervisors should contact your Human Resources representative or the Safety and Health Department if they need assistance.

### **Safety is Everyone’s Job**

We should work together to make the Company a safe and healthy place to work. You must use safety equipment in accordance with both Company and legal regulations, and everyone at the Company must observe all applicable safety and health procedures. You are encouraged to bring workplace health and safety hazards to the attention of your

supervisor and/or the Safety and Health Department, and to make suggestions about how to deal with these hazards. Every employee has both the right and responsibility, without the fear of retaliation, to stop performing work if unsafe acts or workplace conditions are such that it places you or others in imminent danger.

### **Handle Hazardous Materials Properly**

The handling, storage, manufacture, transportation, and disposing of any hazardous, toxic, or radioactive material or waste must meet all applicable legal and regulatory requirements. Failure to do so can pose serious harm to you, the community, and the environment, and can have serious legal consequences that may damage the Company's reputation and business.

# **FAIR EMPLOYMENT PRACTICES**

*Realizing that the Company's continued success depends on the development and contribution of its employees, the Company is firmly committed to equal employment opportunity and an inclusive work environment that recognizes and respects employee contribution and diversity. It is the policy of the Company to afford equal employment opportunity to qualified individuals without regard to race, color, sex, gender, sexual orientation, gender identity, gender expression, national origin, ethnicity, physical or mental disability (including being regarded as disabled), religion, age, pregnancy (including childbirth or related medical conditions), marital status, genetic information, military or veteran status, immigration status or citizenship status, or other legally protected criteria, and to comply with all applicable federal, state, and local laws and regulations.*

## **KEY POINTS**

### **Don't Engage in Discriminatory Conduct**

You should expect and should receive fair treatment on the basis of job performance and other business-related criteria. This encompasses all aspects of the employment relationship, including but not limited to, in application and hiring, promotion and transfer, selection for training, compensation, performance evaluation, assignment, disciplinary action, termination, and retirement.

### **Don't Engage in Harassment of Others**

Verbal or other harassment of any employee for any reason is strictly prohibited and will not be tolerated. Such conduct destroys the cohesiveness and teamwork so vital to the Company's success and is counter to the respectful work environment that the Company

requires in all of its operations.

The Company prohibits all forms of sexual harassment. Examples of sexual harassment include unwelcome sexual advances, requests for sexual favors, or otherwise offensive conduct, especially where:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; or
- Such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

The following types of behavior may rise to the level of harassment, depending upon the specifics of the situation:

- Sexually offensive or off-color language or profanity, sexual banter, sexual jokes, and sexually suggestive materials (images, cartoons, objects, signs, reading materials, etc.).
- Sexually suggestive or lewd comments or behavior.
- Inappropriate touching, sexual advances, or propositions.
- Sexual acts or requests or demands for sexual favors, or both.
- Slurs, jokes, and other verbal, graphic, or physical conduct relating to an individual's sex, race, color, age, religion, ethnic or national origin, disability, marital status, sexual orientation, or gender identity.
- Social media postings that are obscene, threatening, harassing, or abusive.

### **Treat Everyone with Respect**

The Company's prohibitions against discrimination and harassment also apply to its selection of, and relationships with, contract personnel and vendors as well as its treatment of customers and others with whom employees come in contact in the work environment.

### **Know the Policies, Practices, and Applicable Law**

Management personnel have an additional responsibility to communicate, carry out, and enforce the fair employment policies and practices of the Company. Your immediate supervisor or your Human Resources representative can provide or obtain answers to questions regarding those policies and practices, or their application to specific circumstances.





# CONTROLLED SUBSTANCE AND ALCOHOL POLICY

*The intent of the Company is to provide a working environment for all employees free of the abuse of controlled substances, drugs, and alcohol. In order to provide quality customer service, the Company will make every reasonable effort to operate a drug-free workplace and will have zero tolerance for noncompliance.*

## KEY POINTS

### Maintain a Drug-Free Workplace

The Company will not tolerate the unauthorized use, solicitation, consumption, possession, purchase, distribution, or sale of any controlled substance or marijuana (whether for medical or recreational purposes) while on Company business or on Company property. A controlled substance is:

- Any drug of which the possession, sale, distribution, or consumption is illegal.
- A prescribed or over-the-counter (“OTC”) substance, which is legally obtained but not being used for its intended purpose.
- A prescribed or OTC substance which is legally obtained and used for its intended purpose, but the use of which causes the employee to be impaired or in an unfit condition for work.

The Company may report the prohibited use, solicitation, consumption, possession, purchase, distribution, or sale of controlled substances or marijuana while on Company business or on Company property to appropriate law enforcement officials.

### Do Not Mix Work and Alcohol

The Company will not tolerate alcoholic beverages brought onto or consumed on Company property except as may be specifically permitted in connection with Company-authorized events.

### Do Not Work While Unfit or Impaired

The Company will not tolerate any employee reporting to work or entering Company property in an unfit or impaired condition. An unfit or impaired condition exists when an employee’s behavior, ability to work, or both, is adversely affected by a controlled substance, marijuana, alcohol, or a combination of the same. If, in the sole opinion of your supervisor, you appear to be in an unfit or impaired condition and your actions involve a risk of personal injury, injury to others, or property damage, you will be required, where allowed by state or local law, to be

tested for alcohol, marijuana, and/or controlled substance use.

### **Drug Screening and Testing**

In furtherance of this commitment, the Company maintains a policy in which job applicants and current employees may be requested or required to submit to drug and alcohol testing in certain situations. The Company complies with all applicable laws regarding drug and alcohol testing and current and prospective employee privacy rights.

# **WORKPLACE VIOLENCE PREVENTION**

*The Company is committed to preventing workplace violence and to maintaining a safe work environment. The Company has adopted the Workplace Violence Prevention Policy, located on the Company's intranet site, to deal with intimidation, harassment, and other threats of or actual violence, including intimate partner violence, which may occur on-site or off-site during work-related activities.*

## **KEY POINTS**

### **Don't Engage in "Intimidating, Harassing, or Threatening" Conduct**

All individuals (employees, temporary personnel, contractors, business associates, vendors, clients, visitors, and anyone else whom employees come into contact with during work) on the Company's premises, or while representing the Company, are expected to conduct themselves in a professional manner consistent with good business practices and in accordance with the Company's Equal Employment Opportunity, Diversity, and Respect Policies.

### **Prohibited Conduct**

The Company strictly prohibits the use of violence or threats of violence in the workplace and takes such actions very seriously. You are required to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. The possession of prohibited weapons in the workplace, threats, threatening or menacing behavior, stalking, or acts of violence against employees, temporary personnel, contractors, business associates, vendors, clients, visitors, or other individuals by anyone on Company property will not be tolerated.

The Company reserves the right to respond to any actual or perceived acts of violence in a manner the Company sees fit based on the particular facts and circumstances. Violence,

or threats of violence, by employees will lead to disciplinary action up to and including termination of employment and the involvement of appropriate law enforcement authorities as needed.



### **Possession of Prohibited Weapons**

The possession of any prohibited weapon(s) or use of dangerous weapon(s) is strictly prohibited on all Company-owned or -leased facilities or property in accordance with local, state, and federal laws. Prohibited weapons are not permitted to be stored on your person, inside your personal vehicle, in your desk, locker, or inside a Company-owned, -leased, or -rented vehicle on Company premises.

### **Reporting Procedure**

You are responsible for reporting indirect or direct threats of violence, incidents of actual violence, and suspicious individuals or activities – including those related to partner violence – as soon as possible to your supervisor, Security personnel, your Human Resources representative, or any member of senior management.

You should not place yourself or others in peril, nor should you attempt to intercede during an incident, including threatening or harassing telephone calls. In the United States, threatening or harassing telephone calls or other suspicious activity should be immediately transferred to the Rollins Security Number at 2911 (from a Company landline) or 404-888-2911. For employees outside the United States, threatening or harassing telephone calls or other suspicious activity should be immediately reported to your supervisor and appropriate legal authorities.

In the United States, if there is an imminent or immediate threat of violence, the supervisor should call 911 first, and then notify Rollins Security by calling 2911 (Rollins Security Number from a Company landline) or 404-888-2911, and their Human Resources representative. For employees outside the United States, the supervisor should involve the appropriate legal authorities as soon as possible.

# TRADING IN STOCK

*The buying and selling of stock or other Company securities by those possessing material nonpublic information is forbidden. Substantial criminal and civil penalties against the Company and involved individuals can result from this type of activity.*

## KEY POINTS

### **Don't Engage in "Insider Trading"**

"Insider trading" is buying or selling the stock or other securities of the Company or any other corporation when in possession of material nonpublic information about the business in question. No individual may engage in this type of stock trading.

### **Safeguard Material Inside Information**

"Material Nonpublic Information" is any information concerning the business or operations of the Company which has not been disclosed to the public, but which could influence reasonable investors to buy, sell, or hold stock or other securities. Common examples of information which may be Material Nonpublic Information include dividend and earnings announcements, financial results, financial forecasts (especially earnings estimates), changes in previously disclosed financial information, significant capital projects, mergers or acquisitions, proposed issuance of new securities, major marketing changes, significant new contracts, major litigation, governmental investigations, or significant changes in management. Such information should be exchanged only on a "need to know" basis and must be protected.

### **Don't Pass or "Tip" Material Inside Information**

It is illegal to communicate Material Nonpublic Information to others, even close family members, who could trade the stock or security in question, or give the information to others who might trade. If the individual receiving the tip purchases or sells stock or securities, both the person providing the tip and the individual receiving the tip may be liable for a violation of federal securities laws.

### **Report Disclosures of Material Inside Information**

If you think that Material Nonpublic Information has been disclosed in violation of our Public & Private Disclosures of Financial and Other Material Information Policy, contact the General Counsel.

### **Seek Legal Advice**

If you are considering trading in a stock or security about which you think you may possess Material Nonpublic Information, contact the General Counsel for guidance.

## **Insider Trading Policy**

All employees are subject to the Company's Insider Trading Policy. Please refer to the Rollins Insider Trader Policy located on the Company's intranet site for complete details.

# **BRIBES AND IMPROPER CONDUCT**

*It is the policy of the Company to abide by both the letter and the spirit of the laws where we conduct business. Compliance with such laws is required even when it could place the Company at a competitive disadvantage. The penalties for noncompliance can be severe, both for the Company and for individual employees involved in noncompliance.*

## **KEY POINTS**

### **Do Not Give or Receive Unlawful Payments or Bribes and Follow Anti-Corruption Laws**

Without exception, no bribes of any type may be paid to or accepted by anyone. A bribe is defined as the payment or offering of anything of value to obtain or retain business or to secure any other improper advantage. It is prohibited to offer, give, solicit, or receive a bribe to or from any government entity, official, or employee, politician, or other party (including, in some countries, any other person or business entity). This includes payments or offers to any third party while knowing or disregarding circumstances tending to show that they will be paid to government officials or politicians.

### **The U.S. Foreign Corrupt Practices Act**

Because the Company is incorporated in the United States, the U.S. Foreign Corrupt Practices Act ("FCPA"), which prohibits bribes to officials of non-U.S. governments, applies to all employees around the world.

### **Anti-Corruption Laws in Other Countries**

All personnel must comply with the anti-corruption laws of the countries in which they operate.

### **Documentation of Payments**

The FCPA and other anti-corruption laws require the Company and employees to keep all Company books, records, and accounts accurate. Permissible payments to any of the parties described above must be well-documented. You should seek guidance from the Legal

Department on what constitutes a permissible payment.

### **Don't Engage in Suspect Practices**

The Company forbids practices such as industrial espionage, trespassing, burglary, wiretapping, and stealing, whether from the Company, customers, suppliers, or competitors. For example, hiring a competitor's employees to obtain confidential information or improper solicitation of confidential data from a competitor's employees will not be tolerated.

# **POLITICAL CONTRIBUTIONS AND POLITICAL ACTIVITY**

*Although the Company encourages lawful political contributions and involvement by its employees, such activities must be conducted in strict compliance with all applicable federal, state, and local laws and must avoid even the appearance that the Company is seeking or receiving undue political advantage. The Company maintains a non-partisan position on political matters.*

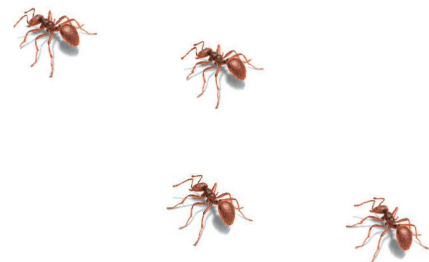
## **KEY POINTS**

### **Don't Use Company Money for Political Contributions**

Any individual employee may personally contribute to a political campaign, but Company employees are not authorized to make political contributions on behalf of the Company. You may not use Company funds or get reimbursed by the Company for political contributions. All requests for Company political contributions must be forwarded to the Operational Support Group Vice President. To the extent permitted by applicable federal and state laws, contributions may be made through one or more political action committees.

### **Keep Personal Political Activities Separate from Company Business**

The Company encourages you to participate in the political process on your own time and at your personal expense. Seeking or holding any public office may give rise to situations where an employee's obligations to the community and to the Company may conflict. In such situations, you should avoid fellow employee solicitation or participation in decisions, whether as a representative of the Company or the public, which present such conflict.



# PROTECTING COMPANY ASSETS

*The facilities, vehicles, equipment, materials, real estate, and other assets of the Company, tangible and intangible, have been acquired through the hard work and investment of many stakeholders in the Company's success – employees, shareholders, customers, and others. Assets also include personal information of employees and customers. All of these assets are intended to advance the many interests in the economic success of the Company. You have perhaps the largest and most immediate interest in that success, and the largest obligation to safeguard the assets necessary to achieve it.*

## KEY POINTS



### **Business Conduct Reportline**

The Company maintains a totally anonymous toll-free reportline for employees to report any suspicious activity or any type of concern, 24 hours a day, 7 days a week. The calls are taken by an independent organization retained by the Company who interviews the caller to secure as much information about the activity as possible. The concern is then forwarded to the appropriate personnel to investigate and take any required corrective or disciplinary action. (Business Conduct Reportline: 1-855-270-3687 in the United States and Canada; 1-800-73-8957 in Australia; 0808-234-2965 in the United Kingdom; 800-110-2345 in Singapore). You may also submit a report via the Business Conduct Reportline website at [www.rollins.ethicspoint.com](http://www.rollins.ethicspoint.com).

### **Protect Assets from Loss or Harm**

Though it may not be your specific job to guard equipment, materials, and other Company assets, you should report conditions, activities, or individuals which threaten the security or condition of Company assets. Report damage, theft, or attempted theft, or conditions or practices which might cause harm or loss, whether or not the property in question is entrusted to you. All employees entrusted with a Company-owned, -leased, or -rented vehicle must also comply with the Company's Fleet Policies located on the Company's intranet site.

It is your specific responsibility to safeguard and protect any personal information of other employees or customers that is in your possession or control. Such information, when not being used, needs to be stored or housed in a secure location whether in tangible or electronic format. Every employee is charged with protecting that information from loss, theft, or inadvertent disclosure. Please also read the following section entitled "Protecting

Need to report a concern? Go to page 22 for the appropriate number.

Confidential Information,” as Company Confidential Information is also a Company asset.

### **Don't Appropriate, Borrow, or Loan Company Property without Permission**

Misappropriating Company property, or converting it to personal use for yourself or another, without express authorization, is regarded as serious as outright theft and can result in disciplinary action up to and including termination of employment. Your paid working time is also a Company asset, which should not be put to personal use without proper authorization.

### **Don't Improperly Use Company Resources or Assets**

You may not improperly use Company resources or assets nor permit others to do so. Examples of improper use of Company resources include unauthorized appropriation, possession, or personal use of Company or customer assets (such as Company vehicles, checking accounts, customer lists, employee lists, stationery, software, and computer), or the unauthorized possession, use, alteration, destruction, or disclosure of sensitive Company data.

### **Follow All Security Regulations**

Rules pertaining to security of facilities, material, information, and equipment may sometimes seem burdensome, but they are necessary. Do not ignore or override safeguards designed to protect computers. Do not fail to secure sensitive information, Internet access, or easily transportable tools and equipment when you are done with them. Do not neglect fire and other safety precautions.

### **Use of Technology and the Internet**

Company technical resources include but are not limited to desktop and laptop computer systems, Company-issued cellular phones and iPads, fax machines, Internet access, voicemail, and email. It is important to understand that these technological tools are to facilitate and support Company business and are to be used for business purposes. All usage must be in accordance with the Company's policies located on the Company's intranet site. The use of such technology to send or view material that is offensive or inappropriate in a business environment is strictly prohibited. You should not expect any personal use of the Company's information systems or technology to be private. When using such technical resources, each employee is charged with doing so in a responsible and secure manner. You should regularly review cybersecurity training and usage policies. You must constantly be on guard against any sort of electronic hacking, phishing, or other attempts to obtain Company information or otherwise disrupt Company assets and activities. All employees are required to complete cybersecurity training as part of the onboarding process and annually, thereafter. Additional training may be required throughout each year as the need arises.



## **Using Artificial Intelligence at Work**

Artificial intelligence (“AI”) services can be powerful and valuable tools but can also impose significant risk to the Company. You are permitted to use AI tools for and at work as long as they have been vetted and approved for internal use. Consult with the Company’s IT Department or Cybersecurity Department if unsure of an AI platform’s authorized use. You must comply with all Company policies, including policies regarding confidentiality and technology use, while using authorized AI tools. The Company will continue to educate and inform employees as AI policies and usage evolve in order to mitigate the risk to the Company and its employees.

## **Use of Social Media**

The Company respects the right of employees to engage in the use of social media outside of work. The Company does not intend to restrict the flow of useful and appropriate information, but instead wishes to minimize the risk to the Company and its employees. You should not post content that violates any of the Company’s policies, including but not limited to, the Equal Employment Opportunity, Diversity, and Respect Policies, and the Workplace Violence Prevention Policy, or state or federal law, or that would in any way cause the Company to be noncompliant with state or federal law.

## **Cooperate with Inspections and Searches Designed to Protect Company Assets**

Where it is determined that searches and inspections are appropriate in the interest of protecting Company assets, employee health and safety, governmental requirements or security, or the furtherance of this Code, to the extent permitted by law, Company personnel may inspect and search at any time all items, vehicles, and areas controlled by the Company and inspect the personal property of all individuals on Company-controlled premises.

# **PROTECTING CONFIDENTIAL INFORMATION**

*While the sharing of information is necessary to meet the needs of our business and employees, you are responsible for protecting information belonging either to the Company or entrusted to it by third parties. This information is considered “Company Confidential Information.” Improper disclosure can create serious financial or competitive losses or disadvantages to the Company and lead to legal liabilities for the Company and persons involved.*

## KEY POINTS

### **Know What is Considered Company Confidential Information**

Company Confidential Information can include, but is not limited to, financial, operating, and marketing information (historical, current, or projected), information concerning circumstances or events that could have a material financial impact on the Company, business plans, customer information (including photos), lists, and profiles, budgets, information about employees, software, pricing policies, technical information, information related to litigation and claims, and similar information entrusted to the Company by third parties. Confidential information also includes any personally identifiable information (“PII”), Personal Credit Information, and Protected Health Information of our customers and employees. It includes social security numbers, driver’s license numbers, dates and places of birth, and family names. PII is any data that can be used to exploit or steal the identity of an individual. All Company information should be treated as confidential, regardless of markings or designations, unless specifically designated otherwise.

### **Don’t Disclose to Unauthorized People**

Access to Company Confidential Information should be limited to persons who have a “need to know” in order to perform their duties. Release of such information outside of the Company, whether oral or written, is prohibited except when discussion of such information is necessary (and even then, must be limited to only that information required in the normal course of conducting business on behalf of the Company). Proper authorization, and in some cases, an approved confidentiality agreement signed by the recipient, is required. The Company has adopted various policies to comply with recognized privacy and security protocols. If in doubt, do not disclose. Never post Company Confidential Information on any social networking site.

### **Disclosures to Analysts, Market Professionals, and Shareholders**

Communications with analysts, market professionals, and shareholders must only be through the Company’s Chairman, President and Chief Executive Officer, Chief Financial Officer, Group Vice President, Finance, Vice Chairman, Vice President of Investor Relations, or a written designee of the Chief Financial Officer or Chief Executive Officer, unless otherwise directed by the Company’s Board of Directors. All financial information or statistical operating information, whether written or oral, to be released to the news media or the financial community, must comply with the Company’s Public & Private Disclosures of Financial and Other Material Information Policy.

### **Media Inquiries**

If contacted by members of the media, do not attempt to answer their questions. All media inquiries must be referred to the appropriate Company department. For more information on how to handle media inquiries, please refer to the Rollins Media Policy located on the Company’s intranet site.

### **Guard Against Inadvertent Disclosure**

Care must be taken not to lose Company Confidential Information or disclose it through casual conversation, gossip, or improper disposal. Never leave such information unattended on computers, tablets, phones, desks, copiers, or fax machines. Ensure that all electronic communications related to such information are necessary, genuine, and done under secure processes. Even obsolete or prior versions of Company Confidential Information must be properly safeguarded.

### **Do Not Use for Personal Benefit**

Company Confidential Information that you learn through your employment with the Company shall not be used by you for your own personal benefit.

### **Former Employees Remain Obligated**

Employees leaving the Company: (i) must safeguard and return Company Confidential Information in their possession; (ii) are not free to discuss business information with competitors, franchisees, or other parties; and (iii) must abide by confidentiality agreements they have signed. Current and former employees are not free to discuss Company business information with competitors, franchisees, or other third parties.

# **COMPLIANCE WITH THIS CODE**

*Every employee has a responsibility to maintain and advance the business reputation of the Company and its employees, to act in compliance with this Code, and to maintain high business conduct standards and a work environment of trust and respect. It is management's responsibility to communicate and train employees in the values and requirements outlined in this Code, to lead by example, and to establish and maintain processes to prevent, detect, report, and correct violations.*

## **KEY POINTS**

### **Comply with the Law, this Code, and our Policies and Report Violations**

It is your obligation to comply with all applicable Company policies and procedures and laws, not just those which have been outlined in this Code. You are obligated to report known or suspected violations of the law, this Code, and the Company's policies and procedures.

## Where to Report

Typically, reports may be made to your immediate supervisor. If you do not feel comfortable or appropriate doing so in a given situation, a report may be made to a higher level of your management structure or your Human Resources representative.

Reports can also be made to:



- The Business Conduct Reportline toll-free at 1-855-270-3687 (in the United States and Canada), 1-800-73-8957 (in Australia), 0808-234-2965 (in the United Kingdom), 800-110-2345 (from within Singapore), or at [www.rollins.ethicspoint.com](http://www.rollins.ethicspoint.com);
- The Human Resources Department at [EmployeeSupport@Rollins.com](mailto:EmployeeSupport@Rollins.com);
- The General Counsel or a Deputy or Assistant General Counsel in the Legal Department at [LegalDeptInternal@Rollins.com](mailto:LegalDeptInternal@Rollins.com); or
- The Internal Audit Department at [InternalAudit@Rollins.com](mailto:InternalAudit@Rollins.com).

To the extent possible, the Company will take appropriate measures to keep the identity of those reporting suspected violations confidential, though the release of certain limited information may be required to serve the purposes of this Code. There will be no retaliation against any employee who makes a good faith report of known or suspected violations of this Code. Frivolous reporting or reporting done for an improper purpose, however, will not be tolerated.

## Ask Questions

Several sections of this Code are based upon the Company's policies and procedures available on the Company's intranet site. If you have questions, consult the Company's intranet site, or ask your immediate supervisor. You may also contact any of the individuals listed in the section entitled "Where to Report"

## Cooperate with Investigators and Auditors

You have a duty to cooperate fully with investigations and audits, and to answer questions truthfully to the best of your ability. Depending on the matter audited or investigated, those assigned to the task may include local and/or corporate personnel with the requisite skills or experience such as: auditors, Human Resources personnel, Termite Compliance personnel, particular supervisors, security personnel, or other employees, contract investigators retained for a particular investigation, or one or more attorneys representing the Company who may personally conduct or supervise the audit or investigation.

## Take Corrective Action

When an audit or investigation reveals the need to take corrective measures, you have an

obligation to cooperate in implementing changes in systems, practices, or procedures to avoid future problems.

It is management's obligation to determine, based on the facts and circumstances of each case, whether an infraction under this Code warrants disciplinary action. Such action may involve penalties up to and including termination of employment. Disciplinary action, or lack thereof, does not preclude criminal or civil action by government agencies or law enforcement authorities for suspected violations of applicable laws.

### **Never Cover Up Ethical Violations**

Concealing a violation is a major violation of this Code. Where an audit or investigation clearly establishes that any employee has knowingly attempted to conceal a clear instance, pattern, or practice of business conduct violation, or has ordered or requested such a concealment, the penalty for such conduct, in the absence of significant mitigating circumstances, may be immediate discharge. No one is authorized or required to carry out any order or request to conceal a violation of the Code and any employee receiving such an order or directive is duty bound to report it.

### **Waivers or Exceptions**

Any waiver of this Code for an officer or director of the Company may only be made by the Nominating and Governance Committee of the Board of Directors or by the full Board of Directors and must be promptly disclosed to the Company's shareholders as required by law. Exceptions involving other members of the Executive Leadership Team or Brand/Division Presidents must be approved by the Executive Leadership Team of the Company (without the implicated Committee member's participation). Exceptions for all other employees must be approved by the Chief Financial Officer or the General Counsel following consultation with the appropriate Brand/Division President. Any written exception or waiver shall be kept in the employee's file.

# **COMPLAINTS CONCERNING ACCOUNTING, FINANCIAL REPORTING, INTERNAL AUDITING CONTROLS, OR**



# AUDITING MATTERS

*The previous section entitled “COMPLIANCE WITH THIS CODE,” sets forth your general obligation to report known or suspected violations of this Code and outlines where to make such reports. This section provides for confidential, anonymous submissions by employees with respect to accounting or auditing matters.*

## KEY POINTS

### **Special Rules for Complaints Concerning Accounting, Financial Reporting, Internal Auditing Controls, or Auditing Matters**

As required by Section 301 of the Sarbanes-Oxley Act of 2002, the Company has adopted special rules allowing employees to submit complaints and concerns they may have regarding what they believe to be questionable accounting or auditing matters. Such complaints may be made on an anonymous or confidential basis if the employee so chooses. Additional details are set forth on the Complaint Form found at the end of this Code. You are not required to use this particular form but should read through it before deciding how to best make a complaint in a manner that will assist the Company in conducting a thorough investigation. There will be no retaliation against any employee who makes a good faith report of known or suspected violations of this Code.

# CODE OF BUSINESS CONDUCT ACKNOWLEDGEMENT FORM

PLEASE READ, SIGN, AND RETURN.

I acknowledge that I have received and read a copy of the Rollins, Inc. Code of Business Conduct and Ethics (2024). I understand that this Code contains certain policies of the Company and I intend to comply as an employee of the Company in accordance with these policies. I know that if I have questions concerning my obligations under the provisions of the Code, or supplements or procedures related to the Code, I should promptly ask my supervisor or the Human Resources Department for appropriate answers. I understand my obligation to report to the Company any suspected violations of this Code that I now know of, or which may come to my attention in the future, and to cooperate with investigations regarding possible Code violations.

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Name (Please Print)

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Signature

Date

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Employee Number

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Department Name

# COMPLAINT FORM

## CONCERNING ACCOUNTING, FINANCIAL REPORTING, INTERNAL ACCOUNTING CONTROLS, OR AUDITING MATTERS

This Complaint form is provided for the submission of concerns regarding accounting, financial reporting, internal accounting controls, or auditing matters. It is intended to comply with Section 301 of the Sarbanes-Oxley Act of 2002 and is for employees of the Company (or any of its partnerships or joint venture) to air concerns they may have about what they believe to be questionable accounting or auditing matters.

You are encouraged to use this form and supply all of the information requested. You may complete as little or as much of this form as you wish, or you may send a complaint by other means, if you so choose.

You may submit your concern anonymously, if you choose. If you include your name, you should expect to be contacted by the Chief Audit Executive or the Vice President of Corporate Human Resources and other Company officials who may be called upon to investigate your concern. If you wish to have your concern handled confidentially, please indicate: ☐ Yes

Please understand that we encourage employees to report suspected violations of Company Policies. In fact, concealing a violation of a Company Policy is itself a major violation of our Code of Business Conduct and Ethics. There will be no retaliation against any employee who makes a good faith report of known or suspected violations.

Please fill in the remainder of this form as completely and accurately as possible. You are not required to fill in any particular blanks. However, we encourage you to be as complete as possible in order to assist us in a meaningful investigation. Use additional sheets of paper, if necessary.

Please describe your Concern:

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Please identify all employees or other individuals you believe are involved:

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Please indicate both when and where you believe the behavior of concern took place:

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Please identify any employees or other individuals you believe may be witnesses:

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Please indicate all of the sources of your knowledge or beliefs:

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Please provide any back-up documentation which may assist us in our investigation.

Attachments: ☐ Yes ☐ No. If yes, please provide a complete list of all attachments here:

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Please send this completed form to:

Mr. James A. Benton  
Group Vice President of Corporate Human Resources  
Rollins, Inc.  
2170 Piedmont Road, NE  
Atlanta, GA 30324

You may also email a complaint to [JABenton@Rollins.com](mailto:JABenton@Rollins.com) or call the Company's Legal Department at 404-888-2000 and ask to speak directly to the General Counsel or a Deputy or Assistant General Counsel in the Legal Department.

The General Counsel or Chief Financial Officer will keep the Audit Committee of the Company's Board of Directors advised of all concerns reported and appropriate corrective actions will be taken, if warranted.

Optional Information:

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Title: \_\_\_\_\_

Location: \_\_\_\_\_

Date Submitted: \_\_\_\_\_

Date Submitted: \_\_\_\_\_

Retain for three years or such longer  
period as may be required by law.

Control Number: \_\_\_\_\_