


POLITICAL CONTRIBUTIONS POLICY – UNITED STATES

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SECTION	DESCRIPTION	PAGE
I.	Introduction	1
II.	Scope and Applicability	1
III.	Definitions	2
IV.	Purpose	3
V.	Corporate Political Contributions	3
VI.	Personal Political Contributions - Covered Vestis Employees	5
VII.	Questions	5

I. INTRODUCTION

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

II. SCOPE AND APPLICABILITY

This Policy applies to:

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

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

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

III. DEFINITIONS

Corporate Political Contribution: A Political Contribution made using funds from Vestis.

Covered Vestis Employee: A Vestis employee who is:

- a vice president level or higher;
- an Officer of a Vestis legal entity; and/or
- subject to Pay-to-Play laws as determined by the Legal Department, including certain employees working in Sales, Finance and/or Operations.

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

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

Political Contribution: A Political Contribution includes either:

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

where the recipient is a(n):

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

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

Vestis or Company: means Vestis and its subsidiaries and affiliated companies.

IV. PURPOSE

Federal law and certain states prohibit a corporation, such as Vestis, from making Political Contributions and impose strict requirements on contributions from political action committees (PACs). In jurisdictions where corporate Political Contributions are permitted by law, Vestis may contribute corporate funds to federal, state and local political candidates and committees, and other political organizations or associations. Vestis will not make Political Contributions that are prohibited under applicable law. To ensure that Vestis complies with all the applicable laws, the Legal Department must pre-approve any Corporate Political Contribution.

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

V. CORPORATE POLITICAL CONTRIBUTIONS

A. Policy

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

A. Process

To request advance approval of a Corporate Political Contribution, please use the Political Contribution Request Form, which can be found on the Operational Excellence site under [Ethics & Compliance](#) or contact the Legal Department at Legal@Vestis.com.

The Legal Department will coordinate the approval process with key stakeholders, including Vestis Communications/Public Affairs. Vetting Political Contribution requests involves several steps, including gathering relevant facts, legal review, and strategic analysis to ensure that proposed Political Contributions are in the best interest of Vestis. The review process may take a week or longer. All outside legal review costs incurred to vet a proposed Political Contribution will be charged to the applicable department making the request.

B. Disbursement of Approved Political Contributions

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

- Where lawful, the requested Political Contribution will be disbursed from corporate funds (i.e., a corporate contribution).
- In jurisdictions that prohibit Corporate Political Contributions, the contribution request will be denied.

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

C. Political Functions

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

VI. PERSONAL POLITICAL CONTRIBUTIONS - COVERED VESTIS EMPLOYEES

A. Policy

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

B. Process

If you are a Covered Vestis Employee and you, your spouse/domestic partner or dependent child would like to make or solicit a Personal Political Contribution, you must contact the Legal Department before you make or solicit, or commit to make or solicit, a Personal Political Contribution. You must complete the Covered Vestis Employee Personal Political Contribution Request Form which can be found on the Operational Excellence site under [Ethics & Compliance](#) or you may contact the Legal Department at Legal@Vestis.com. The Legal Department will evaluate whether a proposed Personal Political Contribution is in a Restricted Jurisdiction and complies with applicable law.

VII. QUESTIONS

Please contact the Legal Department at Legal@vestis.com with questions about this Policy.