

# Business Conduct Policy

**April 2025**

Dear Teammates,

At Vestis, we believe the trust our teammates, customers, and communities place in us is fundamental to our reputation and the long-term success of our business.

Our Business Conduct Policy (BCP) supports our commitment to earn this trust and helps guide us to ensure our actions reflect the highest standards of integrity. The BCP applies to all of us—including teammates, senior leaders, our board of directors, and anyone acting on Vestis’s behalf. Each of us is responsible for protecting Vestis’s integrity and reputation.

Please take the time to read and understand the BCP. It is an expectation that all of our teammates will comply with it in order to ensure that our actions reflect the highest standards of integrity at all times.

All the best,

Phillip



**Phillip  
Holloman,**  
Interim CEO

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- [Vestis Hotline Information – U.S., Canada, Mexico](#)
- [Vestis Internal Audit Department and Legal Department Email Information](#)
- [Audit Committee Mailing Address](#)



Please visit <https://ir.vestis.com/corporate-governance/governance-documents> 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 Vestis'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 Vestis (also referred to as teammates throughout this policy), and anyone acting on Vestis'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 Vestis 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 VESTIS**, we hold our suppliers, vendors, contractors, and consultants to the same standards to which we hold ourselves. Our international private label garment manufacturers annually confirm their commitment to comply with our vendor code of conduct, and the factories used to produce these products are subject to annual third-party social compliance audits.

**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.

Vestis's ethics and compliance team, led by our Chief Compliance Officer, has primary responsibility for promoting, monitoring, and enforcing ethics and compliance at Vestis, 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.

This policy is periodically reviewed and updated on an ongoing basis as appropriate.

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## 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    | 4 <a href="#">The Vestis Hotline</a>                                     |
| 2 Another Manager | 5 <a href="#">Email to Internal Audit Department or Legal Department</a> |
| 3 Human Resources | 6 <a href="#">Letter to the Audit Committee</a>                          |

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**The Vestis 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. [Click here](#) for more information.



Scan the QR code to connect to the Vestis Hotline page.

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The Legal Department can also answer questions about the BCP, company policies and procedures, and legal issues. You can contact the Legal Department at [Legal@Vestis.com](mailto:Legal@Vestis.com).



## COMPLIANCE WITH THE LAWS

It is Vestis's policy to comply with the laws in each country, state, and locality in which Vestis 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, and other anti-corruption/anti-bribery laws. Every Vestis teammate and any person or entity acting on Vestis's behalf must adhere to the restrictions and standards imposed by those laws and regulations.



## INVESTIGATION PROCESS AND WHISTLEBLOWER PROTECTION

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

Vestis will investigate and take claims of retaliation seriously.



## INVESTIGATION COOPERATION

Vestis teammates 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 Vestis 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 teammate'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.

## EMPLOYMENT AND EQUAL OPPORTUNITY

Vestis is committed to a policy of equal treatment for all teammates and prospective teammates. 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

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

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

## EMPLOYEE DATA PRIVACY

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





## WORKPLACE VIOLENCE

Vestis is committed to maintaining a safe, nonthreatening, and productive work environment for all teammates. Violence, threats of violence, intimidation, or other threatening or hostile conduct toward Vestis teammates 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, or to the local police department, and then promptly to **Vestis Risk Management**. You may also report any threats or threatening activity to the Vestis Hotline.

## ILLEGAL SUBSTANCES AND ALCOHOL ABUSE

Vestis 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 Vestis or customer 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

# What would you do?

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

**A:** Janet should thank Phillip for raising the issue. Vestis 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.

## HARASSMENT

Vestis 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 a teammate'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 a teammate's refusal to submit to sexual advances will adversely affect the teammate'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 Vestis Hotline. Supervisors who receive a complaint of workplace harassment must promptly contact the Human Resources Department. 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 teammate 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.

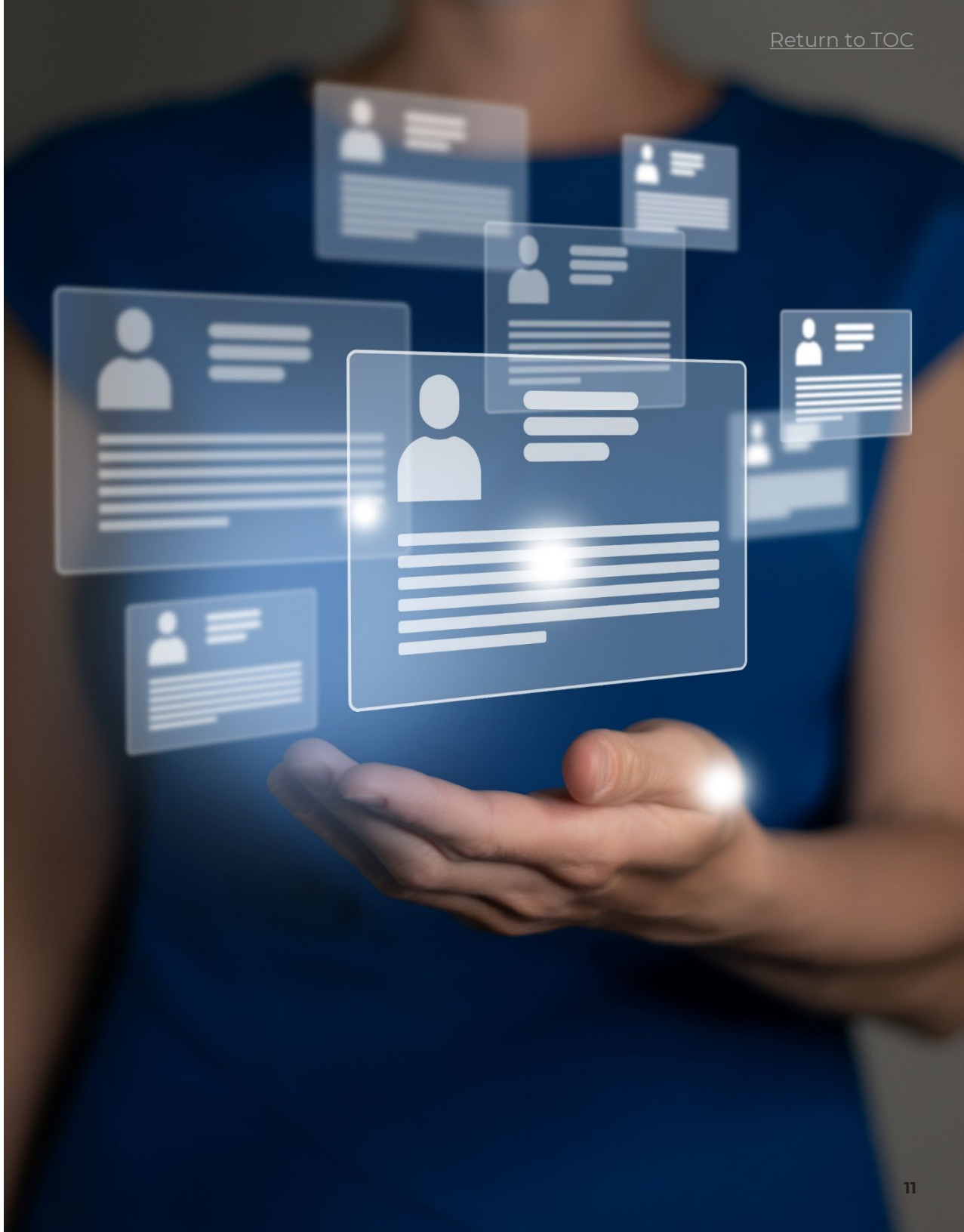


## WORKPLACE RELATIONSHIPS

Vestis 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 a Vestis teammate if the teammate works directly or indirectly for the manager or if the manager has compensation, performance review, or promotional input with respect to the teammate.



*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

## What would you do?

**Q:** Victor, a Maintenance Manager, asks Helen, a Wastewater Operator, to organize supplies. While organizing, Helen 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 Helen to handle and dispose of the chemicals properly?

**A:** Victor must ensure the teammate 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 Environmental team to identify appropriate waste disposal methods.

## WORKPLACE SAFETY AND ENVIRONMENTAL COMPLIANCE

We must conduct business operations in a manner that protects people and the planet, and that is 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, environmental compliance, or your specific responsibilities, contact the Safety or Environmental teams for further guidance.*







# 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 teammate, immediately disclose the situation to your manager so that it can be evaluated. If you have any conflict of interest questions, contact the Legal Department.

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 Vestis in a way that results in personal gain; or
- Recommends, negotiates, or contracts on behalf of Vestis 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.

**i** Please visit <https://ir.vestis.com/corporate-governance/governance-documents> to review the Conflicts of Interest Policy and other policies supporting the BCP. For additional guidance, contact the Legal Department at [Legal@Vestis.com](mailto:Legal@Vestis.com).

### **i** 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.*

### **i** WHAT IS A RELATED PARTY?

- An organization of which the Vestis teammate is an officer or partner
- An organization of which the Vestis teammate is the beneficial owner of 10% or more
- Any trust in which the Vestis teammate has a substantial interest or serves as a trustee or in a similar fiduciary capacity
- Any family member of the Vestis teammate 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 Vestis property, information, or your position for personal gain, and, unless approved in advance by the Legal Department, no teammate may compete with Vestis directly or indirectly.

All teammates owe a duty to Vestis to advance Vestis's legitimate interests. Directors and executive officers are prohibited from taking for themselves personal opportunities that are discovered through the use of Vestis property, information, or position without the consent of the Audit Committee of the Board of Directors. For all other teammates, such consent must be obtained from the General Counsel's office.



### CONFLICTS OF INTEREST

## What would you do?

#### SCENARIO 1

**Q:** Michelle is a General Manager at Vestis. Michelle's husband just bought a linen company that will supply towels and linens to uniform service facilities in the area. Michelle's husband contacts the Merchandise Control Manager to initiate sale of towels and linens. 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 linen company, it would be improper for Michelle's location to purchase from her spouse's company. Because Michelle is involved with buying products for Vestis, 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 supply chain 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 Legal Department. 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 the Vestis Legal Department should evaluate the potential conflict and Raj might need to be removed from work on this particular contract.



## ANTI-BRIBERY

## What would you do?

## SCENARIO 1

**Q:** Greg, an Account Executive, has been meeting John, a purchasing manager for a government agency, who we want as a future customer. Greg believes that he is up against one of our competitors and is fearful that the prospect may decide to go with our competitor. In an effort to sway the decision-maker, he offers to provide John 4 tickets to a professional sporting event. Is Greg's offer acceptable?

**A:** No. Paying money or giving anything of value to anyone for the purpose of obtaining business violates the BCP.

## 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 Vestis policy. Ming must contact the Vestis Legal Department for guidance before moving forward with the licensing process.

## ANTI-BRIBERY AND CORRUPTION

Vestis 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 Vestis an improper advantage
- Improperly reward anyone in connection with existing business or prospective business

Vestis complies with anti-bribery and corruption laws in every jurisdiction in which the company operates, and Vestis prohibits any payment to anyone who may influence a business decision. Numerous laws, including the U.S. Foreign Corrupt Practices Act (FCPA), 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 Vestis 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 the Legal Department 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 the Legal Department is required for any gift or entertainment provided to a government official, except those specifically permitted by the Gifts and Entertainment Policy.



Please visit <https://ir.vestis.com/corporate-governance/governance-documents> to review the Anti-Corruption Policy and other policies supporting the BCP. For additional guidance, Contact the Legal Department at [Legal@Vestis.com](mailto:Legal@Vestis.com).

## 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.



## GIFTS AND ENTERTAINMENT & CHARITABLE CONTRIBUTIONS

# What would you do?

**Q:** **Tomika is a Vestis Territory Manager. One of Tomika's top customers informs her that they work 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 Tamika's customer is a sponsor. The customer asks Tomika if Vestis would co-sponsor the event and says that, as a co-sponsor, Vestis would be able to have four employees participate in the tournament.**

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

**A:** *Tomika should not immediately agree but should tell the customer that she will need to seek approval. Support of charitable organizations is permissible but requests to support them must be reviewed by the Legal and Compliance Departments. The fact that a family member of a possible decision-maker for the customer is on the board of the charity also may raise a concern. Tomika should disclose this fact when seeking approval.*

## GIFTS AND ENTERTAINMENT

Providing gifts or entertainment to customers or suppliers or accepting gifts or entertainment from customers 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 customers, 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 Vestis's Gifts and Entertainment Policy in considering whether it is appropriate to provide or receive a gift or entertainment to or from a customer, potential customer, 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.







ACCURATE BOOKS AND RECORDS

# What would you do?

SCENARIO 1

**Q:** Diane, a Merchandise Control Manager, notices that the inventory value resulting from this month's physical count was lower than she expected. Based on this value, the merchandise put into service 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 increase the actual physical value this month so that merchandise issued 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.*

## ACCURATE BOOKS AND RECORDS

Maintaining accurate and complete books and records is essential to the integrity of Vestis's business and financial reporting. Vestis is committed to transparency and compliance with all applicable financial reporting and recordkeeping requirements, including those under the Securities Exchange Act of 1934 and the Sarbanes-Oxley Act. Adherence to these principles ensures the company maintains the trust of its shareholders, regulators, and the public.

All teammates, officers, and directors must ensure that the company's records, including financial statements, customer invoices, expense reports, and other business documents, are truthful, accurate, complete, and recorded in accordance with applicable laws, regulations (including U.S. Generally Accepted Accounting Principles), and company accounting policies.



## ACCURATE BOOKS AND RECORDS

# What would you do?

## SCENARIO 2

**Q:** John, a General Manager, notices that operating results this month are below expectations. Revenue was down because a customer postponed a large order, plus money was spent on unplanned vehicle maintenance. John speaks to his manager, the Regional Vice President, who suggests that John delay recording several recent supplier invoices until next month so that this month's results look better and suggests that John submit the invoice for the delayed install, expecting that the market center will either receive payment or credit the invoice in the future. 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 Records section of the BCP. John must promptly report the Regional Vice President's suggestion that he act unethically.

## ACCURATE BOOKS AND RECORDS (continued)

No teammate may, or direct any colleague to, engage in any activity that results in false, misleading, or incomplete entries in the company's books and records. All transactions must be properly authorized, documented, and recorded in the appropriate accounts. Falsifying records, misrepresenting financial results, or failing to disclose material information is strictly prohibited and may result in disciplinary action, up to and including termination, as well as potential legal consequences.

Teammates must cooperate fully with internal and external auditors, legal representatives, regulatory authorities, and other authorized parties in connection with financial and compliance reviews.

If you become aware of any inaccuracies, omissions, falsification, or other suspicious activities related to the company's books and records, you must report it by contacting your supervisor, the Vestis Hotline, or by following the procedures outlined in the "Take Action! Raise Concerns and Report Suspected BCP Violations" section of the BCP.



## ANTITRUST, COLLUSION, AND UNFAIR COMPETITION

All teammates 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 customers are mentioned at any meeting with any competitor, you must remove yourself from the situation immediately and report the incident to the Legal Department. Areas of concern include but are not limited to pricing, bidding, territorial or customer allocation, or refusal to deal.

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

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### QUESTIONNAIRES

You must not respond to trade association questionnaires or other inquiries seeking information relating to price. All such questionnaires must be forwarded to the Legal Department.





## 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, an Account Executive, is submitting a bid for a local school district contract and has a friend who works at another company that is also competing for the business. Joel also has a prospective bid for a nearby hospital that comes up 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. Vestis teammates should avoid even the appearance of an agreement with competitors.

### SCENARIO 2

**Q:** Pedro is on a team preparing a bid to provide uniforms for a prospective customer which is a stadium being operated by a local government agency. He runs into 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 the Legal Department. Although Pedro did not share information about Vestis's bid with his friend, he learned information about a competitor's bid. Even if this does not impact Vestis'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 Vestis's 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 their 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 Vestis'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 Vestis, you may possess nonpublic, confidential, and highly sensitive information (inside information) about the company or our suppliers, customers, 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 Vestis securities while in possession of material nonpublic information about Vestis.

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 Vestis, 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, Vestis’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 customer contact that his customer, 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, a manager at Vestis, learns that Vestis is going to acquire a company. Shyla thinks that this will be great for Vestis and her career. Vestis 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 Vestis by customers or others.

You must not use Vestis'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 Vestis 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 Vestis, you are required to return all Vestis property and materials, including those containing company information described in the Information Security section of the BCP.



## COMPANY ASSETS

### What would you do?

**Q:** Joseph, a Route Sales Representative (RSR), overhears another RSR at his Market Center mention that he uses his company-issued fuel card to fuel his personal vehicle. Joseph is concerned the RSR might be stealing from the company, but the RSR 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 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 Vestis Hotline. He should do so without fear of retaliation and may report anonymously.*

## COMPUTERS, EMAIL, AND THE INTERNET

Vestis's computers, mobile devices, network access, and information systems, including email and Internet, are provided for Vestis business use. All email, text messages, and documents created within or received by these systems are considered Vestis property.

The company may review your email, text messages, or other types of messages, and Internet usage, including in the event of possible security breaches, policy violations, or other unauthorized or illegal actions.

You may never use your company equipment to access websites or send emails, text messages, or any other types of messages that contain language, images, or sounds that are harassing, discriminatory, or threatening. Viewing, downloading, or accessing sexually explicit material is strictly prohibited.

Personal use of your Vestis 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

If you upload, store, or transmit any personal information on, to, or from your computer, you do so at your own risk.

You must follow Vestis's Artificial Intelligence (AI) Acceptable Use Policy in order to safeguard the company's confidential and proprietary information from inadvertent disclosure through AI tools.







## SOCIAL MEDIA

# What would you do?

**Q: Ted, a General Manager, is frustrated by the outcome of a recent meeting with a customer. 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 customer, he believes that his actions are appropriate. Is he right?**

**A:** *No. Ted's use of his personal account to discuss customer meetings could imply that Ted is acting on behalf of Vestis, could violate the Social Networking Policy, and could harm our customer relationship. In addition, if Ted's posts reveal any confidential and/or proprietary information belonging to Vestis or the customer, this could be a violation of the Social Networking Policy.*

## SOCIAL MEDIA

When using social media, blogs, discussion forums, online publishing, and user-generated media for business purposes and for personal reasons, all teammates must follow Vestis's Social Networking Policy. Different rules apply when you are using social media on Vestis's behalf and when you are using it for personal reasons.

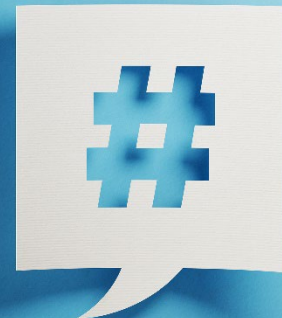
Only designated company spokespeople are authorized to speak for Vestis. If you are authorized to use social media on Vestis's behalf, you must clearly identify yourself as a Vestis employee speaking on the company's behalf.

When using social media for personal reasons, you may not represent or suggest that your posts are approved, sponsored, or authorized by Vestis, or that you are speaking on behalf of Vestis or any Vestis customer or affiliate.

In addition, make sure you comply with all Vestis policies that might apply to your postings and be careful to protect Vestis's confidential and/or proprietary information, as well as the confidential and/or proprietary information of Vestis's customers, suppliers, and teammates.

## COPYRIGHT INFRINGEMENT AND SOFTWARE PIRACY

Vestis 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 the Legal Department or Information Technology Department with any questions about copyright or software licensing.





## INFORMATION SECURITY

## What would you do?

**Q:** Loraine, National Account Manager, has an important customer meeting in the morning to finalize the terms of a substantial renewal. 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 renewing 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 Vestis'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.

INFORMATION  
SECURITY

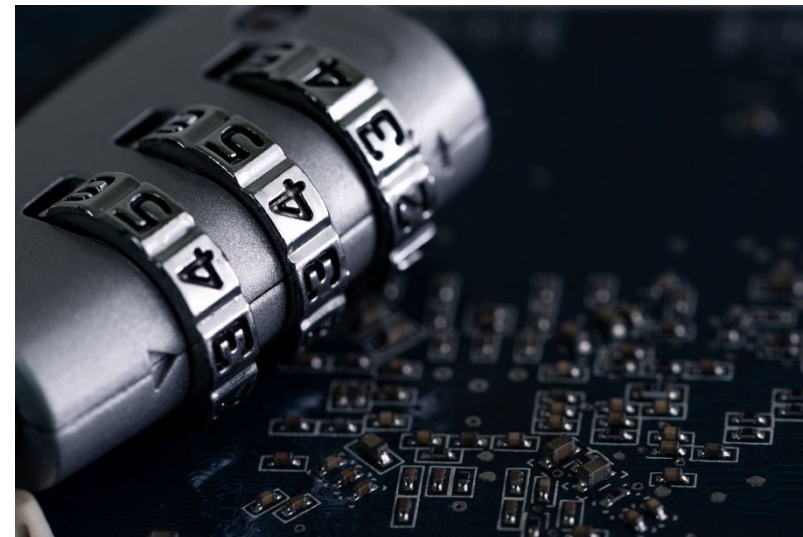
As part of your role or relationship with Vestis, you may have access to nonpublic or proprietary, sensitive information. This includes individual consumer, medical, financial, and other personal information that you might collect from, use, or maintain concerning our current, prospective, or former teammates, customers, suppliers, 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 the Legal Department.

RECORDS  
MANAGEMENT

Everyone has responsibility for properly managing the company's records. Vestis is required by law to save certain records because they are needed for operational, legal, financial, historical, or other purposes. You must follow Vestis's policy regarding retention schedules for particular types of records.

**i** Vestis employees can review our cybersecurity policies by accessing the company's intranet. For additional guidance, please contact the Legal Department at [Legal@Vestis.com](mailto:Legal@Vestis.com), or Vestis Information Security & Compliance at [IT\\_Security@vestis.com](mailto:IT_Security@vestis.com).



## DATA PRIVACY

Vestis offers a broad range of services designed to suit the diverse and ever-changing needs of our customers. 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, such as names, phone numbers, and email addresses. Vestis is committed to respecting the privacy of our customers, teammates, and other third parties, and takes appropriate steps to protect such PII at all times.

### VESTIS ABIDES BY LAWS AND REGULATIONS GOVERNING PRIVACY AND INFORMATION SECURITY, AND ANY PII THAT VESTIS PROCESSES MUST BE:



Obtained  
**lawfully**



Accurate and  
relevant to  
the reason it  
was **collected**



Stored  
**securely**



Processed only  
for the purposes  
for which it was  
**obtained**



Not transferred  
to other countries  
without  
**adequate  
protection**



Limited to what is  
necessary in relation  
to the purposes for  
which it is  
**processed**



Used solely in  
accordance with  
Vestis's policies  
and procedures,  
and applicable  
contracts and  
legal **guidelines**



**Deleted** when  
its retention is  
no longer  
necessary and  
upon valid data  
subject request

#### EVERYONE IS ACCOUNTABLE FOR PROTECTING PII. ALWAYS REMEMBER:

- Access PII only in accordance with Vestis'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 Vestis unless you have the necessary approvals and agreements in place. Reach out to the Legal Department 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 Vestis's policies or applicable law, report it immediately to the Privacy team at [Privacy@Vestis.com](mailto:Privacy@Vestis.com).

Please note that country-specific policies also may apply. If you have questions, contact the Legal Department.







## RESPONDING TO MEDIA INQUIRIES

## What would you do?

## SCENARIO 1

**Q:** James is a customer service representative in Vestis's customer call 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 Vestis look good in the media. How should he handle the call?

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

## SCENARIO 2

**Q:** Alejandra is a General Manager at Vestis. A reporter from the local news reached out to Alejandra for an interview asking for information about Vestis's operations. Alejandra thinks that this is an opportunity to help Vestis look good in the media. How should she handle the outreach?

**A:** Alejandra must decline to comment and refer the call to the Vestis Communications team. Only designated spokespeople are authorized to speak to the media on behalf of Vestis.

## RESPONDING TO GOVERNMENT, MEDIA, AND INVESTOR INQUIRIES

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

- All government requests or inquiries, including subpoenas, requests for interviews or access for government officials to Vestis facilities and documents, must be forwarded to the Legal Department immediately.
- All media requests for a statement by or on behalf of Vestis must be promptly referred to the Vestis Communications Department at [Internalcommunications@vestis.com](mailto:Internalcommunications@vestis.com).
- Only designated company spokespeople are authorized to speak for Vestis or manage the process involving others.
- All requests from institutional or retail investors, industry analysts, or market researchers must be referred to the Investor Relations team at [IR@Vestis.com](mailto:IR@Vestis.com).



## 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 the Legal Department before using or committing to use corporate funds or assets or Vestis political action committee (PAC) funds to make a political contribution at the federal, state, or local level.

Pressuring teammates to make political contributions is prohibited. Vestis 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 Vestis, 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 Legal Department. 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.

**i** Please visit <https://ir.vestis.com/corporate-governance/governance-documents> to review the Political Contribution Policy and other policies supporting the BCP. For additional guidance, contact the Legal Department at [Legal@Vestis.com](mailto:Legal@Vestis.com).

## PUBLIC DISCLOSURES

All teammates involved in Vestis'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.



## ENGAGEMENT OF LOBBYISTS

Written approval from the Vestis Legal Department is required prior to hiring or paying a lobbyist or other government affairs consultant to do any work on behalf of Vestis.





# Resources for Voicing Questions or Concerns

## VESTIS HOTLINE

### United States, Canada, and Mexico: Website and QR Code

- <http://vestis.ethicspoint.com>
- You can also scan the QR code to be taken to the online submission page.



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 Vestis 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.

### Waiver

In certain limited situations, Vestis may waive the application of the BCP to teammates, 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 Vestis teammates other than executive officers and directors, waivers require the approval of the General Counsel's office.

## WE WANT TO HEAR FROM YOU

COUNTRIES	PHONE NUMBERS
United States	833-407-9550
Mexico	800-266-5234
Canada	833-407-9551

For a copy of the BCP in Spanish and French Canadian, please visit <https://ir.vestis.com/corporate-governance/governance-documents>

**Do not be afraid to speak up.** Vestis prohibits retaliation. You will not get in trouble for making a report as long as you act in good faith and with a reasonable belief that the information you are providing is true.

EMAIL	
Internal Audit Department	<a href="mailto:Audit@Vestis.com">Audit@Vestis.com</a>
Legal Department	<a href="mailto:Legal@Vestis.com">Legal@Vestis.com</a>
MAIL	
Send a letter addressed to any of the above or to the Audit Committee of the Board of Directors at Vestis's corporate office.	Vestis 1035 Alpharetta Street Suite 2100 Roswell, GA 30075

