



## **UNIFIRST CORPORATION STATEMENT OF CORPORATE POLICY AND CODE OF BUSINESS CONDUCT AND ETHICS**

### **INTRODUCTION AND GENERAL STATEMENT**

It is the policy of UniFirst Corporation (the “Company” or “we”) to comply with the law and to conduct its affairs in keeping with high moral, legal and ethical standards. We will continue to conduct our business with integrity in relation to customers, suppliers, competitors, and all others with whom we deal, including other UniFirst Team Partners. All Team Partners are expected to perform their duties honestly, responsibly, and diligently, and in full compliance with this Statement of Corporate Policy and Code of Business Conduct and Ethics (this “Statement”). All references in this Statement to "Team Partners" should be understood to include all employees, officers, and directors of the Company (including its subsidiaries), unless the context requires otherwise.

This Statement is being issued to reaffirm our policy in all areas, including compliance with laws, environmental matters, antitrust laws, conflicts of interest, political contributions, payments to government officials or others, giving or receiving gifts, proper accounting, the use of inside information, confidentiality, fair dealing, and protection and proper use of Company assets. The Statement is therefore an expression of our views on some of the most significant aspects of business ethics and legal compliance. However, no code of conduct can address every situation. Rather, we must rely in large measure on the integrity and good judgment of our Team Partners to observe the highest standards of business and personal ethics in the discharge of their assigned duties and responsibilities. We hope that this Statement will provide guidance to our officers, directors, managers, and other Team Partners at our various locations in dealing with the difficult and often unique issues which may arise in the day-to-day conduct of our business.

This Statement is applicable to the Company, its officers, directors, managers, and other Team Partners at all of its domestic and foreign locations. References to the Company in this Statement include all subsidiaries of the Company.

The integrity, reputation and profitability of the Company ultimately depend upon the individual actions of the Company's Team Partners. As a result, each such individual is personally responsible and accountable for compliance with this Statement.

### **COMPLIANCE WITH LAWS, RULES AND REGULATIONS**

The business of the Company shall be conducted in compliance with all applicable laws, rules and regulations. The use of Company funds or assets for any purpose that would be in violation of applicable laws, rules and regulations is prohibited. Compliance with the law means not only observing the letter and spirit of the law, but also conducting our business in such a manner that the Company will continue to deserve and receive recognition as a good and law-abiding citizen. Our reputation as a good corporate citizen is one of the most valuable assets the Company possesses. The determination of which laws, rules and regulations are applicable, and their interpretation may be difficult. In such cases,



Team Partners should consult with their supervisor (as applicable) and/or seek such legal advice as is necessary to comply with this Statement.

## **ENVIRONMENTAL LAWS AND REGULATIONS**

It is the policy of the Company to conduct all of its operations in strict compliance with all applicable environmental laws and regulations so as to promote the protection of public health and the environment.

Further, it is the Company's policy to develop and implement reasonable, sound environmental engineering practices in cooperation with interested regulatory officials whenever possible. It is the responsibility of all Team Partners to fully implement the letter and spirit of this policy, and Location Managers of the Company have particular obligations to monitor and expedite implementation at their facilities.

## **ANTITRUST LAWS**

The business of the Company shall be conducted in compliance with all applicable antitrust laws. In general terms, this means that agreements or arrangements which substantially lessen or eliminate competition should be avoided. In addition, agreements with competitors which would have an impact on prices, marketing areas, production volumes, sources of supply and channels of distribution, are potential antitrust violations and must be avoided. Other suspect areas are the exchange of price information, reciprocal dealing, discrimination in prices and other unfair methods of competition. When in doubt, the Team Partner should discuss the matter with their supervisor and/or legal counsel to the Company before taking any questionable action.

## **CONFLICTS OF INTEREST**

Conflicts of interest may arise in many situations. They happen when a Team Partner benefits directly or indirectly at the Company's expense or when their actions are contrary to the Company's objectives. Every Team Partner is expected to avoid any activity, investment, interest, or association that interferes with or appears to interfere with the independent exercise of judgment in the Company's best interests. Clearly, it is impossible to describe every conflict situation. Therefore, in cases where there is any doubt whether an action is proper or improper, Team Partners should consult their supervisor or the Chief Financial Officer of the Company before taking any action.

No Team Partner of the Company shall use their position to benefit any other business or person outside the Company, or to benefit the Team Partner independently of the Company's business. This means, for example, that no Team Partner of the Company, or any member of their family, shall directly or indirectly participate in, or have a significant connection with, any business which competes with or is a supplier to the Company unless that participation is made known to the Company in advance and approved in writing by the Chief Executive Officer of the Company or their designee. Similarly, a Team Partner may not engage directly or indirectly in any outside business activity involving contact with, or work for the benefit of, Company customers, unless the activity is disclosed to the Company in advance and approved in writing by the Chairman or their designee. In addition, any Team Partner in a



management position (defined as any officer or Location Manager) is expected to devote their full and entire working time to his responsibilities and duties for the Company, except for community service and volunteer activities and as may otherwise be approved in writing by such Team Partner's supervisor.

Any material transactions, responsibilities, obligations, relationships, or actions that reasonably could be expected to give rise to a conflict of interest and which are approved by a designated individual in accordance with this Statement should also be communicated promptly by the designated individual to the Chairman of the Audit Committee.

## **POLITICAL CONTRIBUTIONS**

No illegal political contributions of Company funds are to be made, directly or indirectly, to any government official, political party, political party official, election committee or candidate for political office in the United States or in any other country. Political contributions may be made in jurisdictions where permitted by law, but only when the Board of Directors of the Company has specifically approved them. Moreover, no Team Partner is to represent or claim to represent the Company in political matters, either directly or indirectly, without first obtaining clearance from the Chairman or their designee.

This policy is not intended to prohibit Team Partners from engaging in political activities in an individual capacity on their own time and at their own expense, or from making political contributions from their own funds.

## **IMPROPER PAYMENTS**

It is contrary to Company policy, and under some circumstances may be a violation of law, for any improper payments to be arranged for or made, directly or indirectly, on behalf of the Company. Such payments would include bribes, kickbacks, loans, guarantees or other payments given to any customer, supplier, or others in connection with obtaining orders or favorable treatment or for any illegal purpose. It is also improper for any such payments to be arranged for or made to any public official (including federal, state, local and foreign officials) or designated agent for the purpose of influencing any official act or decision to benefit the Company. Payments that are likely to have the effect of improperly influencing decisions to the Company's benefit are equally improper, whether or not that purpose was intended. This policy extends not only to direct payments but also to indirect payments made in any form through consultants or other third parties.

## **GIVING OR RECEIVING GIFTS**

In connection with the Company's business, no Team Partner may give, seek, or accept any type of compensation, fee, commission, gift, entertainment, or any other personal favor, to or from any person, including other Team Partners, prospective Team Partners, customers, competitors, suppliers, and others with whom the Company has or is likely to have any business relationships. Any Team Partner who has reason to believe that any existing or potential supplier, customer, or competitor of the Company is attempting to influence their judgment through the offering of gifts or gratuities, shall report the relevant facts to their Location Manager, as applicable; alternatively, with Corporate Human



Resources or through the EthicsFirst Reporting Line (see below).

The foregoing is not intended to prohibit the giving or accepting of social amenities, within the bounds of good taste and consistent with generally accepted business practices.

However, practices that are acceptable in commercial business environments may be against the law or the policies governing federal, state, or local government employees. Therefore, no gifts or business entertainment of any kind may be given to any government employee without the prior approval of the Chief Financial Officer.

The Foreign Corrupt Practices Act ("FCPA") prohibits giving anything of value directly or indirectly to any "foreign official" for the purpose of obtaining or retaining business. When in doubt as to whether a contemplated payment or gift may violate the FCPA, contact the Chief Financial Officer before taking any action.

## **COMPANY RECORDS**

The Company's accounting system must meet certain requirements for consistency, uniformity and internal control. These requirements are imposed by management, government laws and regulations and reporting obligations to stockholders and outside agencies. The books of account, financial statements and records of the Company shall accurately and fairly reflect all transactions in reasonable detail. They must be maintained in accordance with generally accepted accounting principles as well as all applicable laws and regulations.

All assets and liabilities of the Company shall be properly recorded in the books of the Company. No Team Partner shall make a false or misleading statement to the Company's independent auditors or internal auditors, nor shall any Team Partner conceal or fail to reveal any information which is necessary to make the statements made to such auditors not misleading.

## **INSIDE INFORMATION**

"Inside information" is any material financial, technical, or other information about the Company which is not known to the public. The use or disclosure of inside information for the purpose of obtaining personal financial gain or which enables any other person or business to attempt to make such gains is a violation of this Statement and probably a violation of the law. Such use or disclosure would include the purchase or sale of the common stock or other securities issued by the Company. For a more detailed description of the Company's insider trading policies, please refer to the Company's Insider Trading Policy, which is incorporated by reference into this Statement. Team Partners are required to familiarize themselves and comply with the Insider Trading Policy, a copy of which is distributed to all Team Partners and is available from the Vice President of Legal Affairs of the Company.

## **CONFIDENTIALITY**

Confidential proprietary information generated and gathered in the Company's business plays a vital role in the continued growth of the Company and its ability to compete. Team Partners are required not



to disclose or distribute such confidential proprietary information, except when disclosure is authorized by the Company or required by law and shall use such information solely for legitimate Company purposes. Upon leaving the Company, Team Partners must return all proprietary information in their possession.

"Confidential proprietary information" includes all non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed. This includes information relating to the Company's former or current customers, products, business or marketing plans or projections, unpublished financial or pricing information, personnel information, salary and benefits data, customer, Team Partner and supplier lists, and intellectual property, such as trade secrets, patents, trademarks, and copyrights.

Team Partners working with confidential or proprietary information about other companies and individuals should protect that information, use it only in the proper context and make it available only to other Company Team Partners with a legitimate need to know. In presenting such information, Team Partners should disclose the identity of the organization or individuals only if necessary.

If a Team Partner has any questions concerning whether information in their possession is confidential, or whether disclosure or other use of information is permissible, they should consult their supervisor or the Chief Financial Officer of the Company.

## **FAIR DEALING**

Team Partners are required to act fairly, honestly, ethically and in accordance with applicable law in all business dealings on behalf of the Company, including in all dealings with the Company's customers, suppliers, competitors, and Team Partners.

## **PROTECTION AND PROPER USE OF COMPANY ASSETS**

Team Partners are required to protect the Company's assets entrusted to them and to protect the Company's assets in general. Team Partners shall also ensure that Company assets are used only for legitimate business purposes consistent with the Company's guidelines. Loss, theft and misuse of Company assets have a direct impact on the Company's profitability. Each Team Partner is further prohibited from (i) diverting to themselves or to others any corporate opportunities that are discovered through the use of Company property or information or their position, (ii) using Company property or information or their position for personal gain, or (iii) competing with the Company (as discussed under "Conflicts of Interest"). Any questions concerning the protection and proper use of Company assets should be directed to the appropriate supervisor or the Chief Financial Officer of the Company.

## **QUALITY OF PUBLIC DISCLOSURES**

The Company will seek to comply in all material respects with the disclosure requirements of the Securities and Exchange Commission. The Company's senior management shall be primarily responsible for monitoring such public disclosure.



## **COMMUNICATION OF POLICY AND TEAM PARTNER DECLARATIONS**

A copy of this Statement, as it may be amended from time to time, shall be made available to all Team Partners. All officers, directors, Location Managers, and certain other Team Partners will be requested to sign or certify electronically, periodically, a statement acknowledging they have received copies of the Statement, including a declaration of their compliance with this Statement. The purpose of this declaration is to underline the importance to the Company of compliance with this Statement. In addition, it allows the Company to demonstrate, at all times, that proper standards of conduct are emphasized and maintained. Adherence to these requirements is a condition of employment (both beginning and continuing).

## **DISCIPLINARY ACTION**

It is the personal responsibility of each and every Team Partner of the Company to observe and strictly abide by this Statement. Any Team Partner involved in a violation of this Statement will be subject to disciplinary action according to local laws and regulations and, in the case of employee Team Partners, applicable Company disciplinary procedure. Subject to local laws and regulations, the penalties may include warning, reprimand, probation, suspension, reduction in salary, demotion, restitution, and dismissal depending on the seriousness of the violation.

Persons subject to disciplinary measures shall include, in addition to the violator, others involved in the wrongdoing such as (i) persons who fail to use reasonable care to detect a violation, (ii) persons who if requested to divulge information withhold material information regarding a violation, and (iii) supervisors who approve or condone the violations or attempt to retaliate against Team Partners for reporting violations or violators.

## **REVIEW OF POLICY**

This Statement shall be reviewed periodically by the Board of Directors of the Company to consider amendments or modifications to the Statement or its implementation.

## **COMPLIANCE, REPORTING, CONFIDENTIALITY, AND INTERPRETATION OF THIS STATEMENT**

The Audit Committee of the Board of Directors shall be responsible for administering and monitoring compliance with this Statement. The Audit Committee shall establish such procedures as it shall deem necessary or desirable in order to discharge this responsibility, including delegating authority to officers and other Team Partners and engaging advisors. Administration of the Statement shall include periodically reviewing the Statement and proposing any changes to the Statement which are deemed necessary or appropriate for action by the Audit Committee. The Company shall take reasonable steps to monitor and audit compliance with the Statement, including the establishment of monitoring and auditing systems that are reasonably designed to detect conduct in violation of the Statement. Management-level Team Partners are responsible for communication of and compliance with this policy within their respective organizations.



Every Team Partner is required to act proactively by asking questions, seeking guidance, and reporting any suspected violations with respect to compliance with the Statement, other policies and procedures of the Company, or any government law, rule, or regulation.

The Company is committed to the highest possible standards of ethical, moral, and legal business conduct. If any Team Partner believes that actions have taken place, may be taking place, or may be about to take place that violate or would violate this Statement, they are obligated to bring the matter to the attention of the Company. In accordance with our commitment to open communication, Team Partners are encouraged to raise any concerns about issues that may constitute an ethics violation, questionable accounting or auditing matters, and violation of the Company's policies or the Statement through the Company's designated telephone and web-based compliance hotline ("EthicsFirst Reporting Line"). There are two ways of reporting an issue through the EthicsFirst Reporting Line: [www.unifirst.ethicspoint.com](http://www.unifirst.ethicspoint.com) or by telephone (toll free):

- US: 1-800-213-8979
- Canada: 1-800-213-8979
- Mexico: 001-844-443-0141
- Nicaragua (Spanish): From an outside line dial 1-800-0164, then dial 800-213-8979
- Nicaragua (English): From an outside line dial 1-800-0174, then dial 800-213-8979
- UK: 0808-234-2141
- Netherlands: 08000900133
- Germany: From an outside line dial 0-800-225-5288, then dial 800-213-8979
- France: 0800-91-8063

The best starting point for a Team Partner seeking advice on ethics-related issues or reporting potential violations is to their supervisor. However, if the conduct in question involves their supervisor, if the Team Partner has reported it to their supervisor and does not believe that they have dealt with it properly, or if the Team Partner does not feel that they can discuss the matter with their supervisor, the Team Partner may raise the matter with the next level of management; alternatively, with Corporate Human Resources or through the EthicsFirst Reporting Line. In the case of accounting, internal accounting controls or auditing matters, any concerns, or questions about violations with respect to such matters should be directed to the Audit Committee of the Board (or a designee of the Audit Committee) in accordance with the Audit Committee Complaint Procedure available on [www.unifirst.com](http://www.unifirst.com). In reviewing a report received from a Team Partner, the Company should consider whether the report involves a potential violation of the Statement and if so, it must report it immediately to the Company's Audit Committee, who will have primary responsibility for enforcement of the Statement. Team Partners must not use this compliance program in bad faith, or in a false or frivolous manner.

When reporting conduct suspected of violating the Statement, the Company prefers that Team Partners identify themselves in order to facilitate the Company's ability to take appropriate steps to address the report, including conducting any appropriate investigation. If a Team Partner wishes to remain anonymous, they may, and the Company will endeavor to protect the confidentiality of the reporting person subject to applicable law, rule, or regulation or to any applicable legal proceedings. However, in the event the report is made anonymously, the Company may not have sufficient information to look



into or otherwise investigate or evaluate the Team Partner's allegations. Accordingly, Team Partners who make reports anonymously should endeavor to provide as much detail as is reasonably necessary to permit the Company to look into, investigate and evaluate the matter(s) set forth in the anonymous report.

The Company will use reasonable efforts to protect the identity of any Team Partner who reports potential misconduct. Further, the Company expressly forbids any retaliation against any Team Partner for reporting suspected misconduct. Any person who participates in any retaliation is subject to disciplinary action, including termination. The Company will also use reasonable efforts to protect the identity of Team Partners about or against whom an allegation is brought unless and until it is determined that a violation has occurred. Any Team Partner involved in any capacity in an investigation of a possible violation of the Statement must not discuss or disclose any information to anyone outside of the investigation unless required by applicable law, rule, or regulation or by any applicable legal proceeding or when seeking their own legal advice if necessary.

No waiver of any provisions of the Statement as applied to executive officers or directors of the Company shall be effective unless first approved by the Board or the Audit Committee, and promptly disclosed to the Company's shareholders in accordance with applicable legal requirements. Any waivers of the Statement for other Team Partners may only be made by the Audit Committee. All amendments to the Statement must be approved by the Board, or a committee thereof, and must be promptly disclosed to the Company's shareholders.

Appropriate legal and accounting staff should be consulted on all questions regarding compliance and interpretation of this Statement. Questions regarding this policy which cannot be answered by management shall be referred to the Chief Financial Officer or the Vice President of Legal Affairs of the Company.

**ADOPTED: April 6, 2021**