

Code of Business Conduct and Ethics

Section: Human Resources

Policy & Procedure Number: 101

Date: January 29, 1997 (Revised April 17, 2015)

Guest Services' success and reputation depends on the trust and confidence we earn from our clients, customers, and employees. For that reason, Guest Services requires that all employees maintain the highest ethical standards while conducting Company business, and that they comply with all applicable federal, state, and local laws. This Code of Business Conduct and Ethics policy outlines our standards of conduct and business practices that promote our core value of integrity.

Violations of the Code of Business Conduct and Ethics will result in appropriate disciplinary action, including possible termination.

Employees who have questions about whether a specific action would constitute a violation of our Code of Business Conduct and Ethics are encouraged to contact the Vice President of Human Resources at (703) 849-9380.

Work Conduct

Employees must avoid any conduct that might interfere with Company efficiency, economy, management contracts, relationship with a client, or industry reputation.

Employees may not use Company or Client property of any kind for any reason other than Company business, and no items owned or leased by the Company or Client may be removed from a Guest Services location unless it is for pre-approved business activities.

Company records, documents, and files belong to Guest Services, and may not be removed, copied, disclosed, altered, or made available to anyone unless it is necessary for the normal course of the employee's job responsibilities.

Salaried employees of Guest Services may not hold a second job without the prior consent of the President.

Conflicts of Interest

Employees must avoid situations where the employee's personal interest may conflict with (or appear to conflict with) the Company's interests. This includes situations where an employee receives a personal gain as a result of his/her employment with the Company, or when an employee's personal interests contradict the Company's interests.

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Examples of conflicts of interest include the following:

- Solicitation or acceptance of any benefit (including gifts and money) from a person who has a business relationship with Guest Services or is seeking to obtain a business relationship, other than the acceptance of food, refreshments, or entertainment in the normal course of business or for unsolicited promotional materials which are less than \$20 in value.
- Having a direct or indirect financial interest (including employment) with an organization that competes against or conducts business with Guest Services.
- Hiring or supervising people to whom you are related, by blood or by marriage, without the prior written consent of the Company's President.
- Engaging in outside employment or activities that interfere with your Company responsibilities.

Non-Compete, Non-Disclosure Agreement

As a condition of employment, operations managers and key salaried personnel may not directly or indirectly own, manage, operate, join, or be employed at the client's location where the employee is currently working or has worked in the past for a period of 12 months from their date of separation from Guest Services without prior written consent by the President.

Employees may not disclose, take away, or use any information obtained through their Guest Services' employment for the benefit of a competitor during or after their employment. This includes (but is not limited to) Guest Services' documents, marketing materials, internal reports, client proposals, and recipes.

Dealing With Suppliers

All purchases made by the Company must be made exclusively on the basis of price, quality, service, and suitability to the Company's needs. Company purchases of goods cannot result in employees or their families receiving any personal benefits like kickbacks, rebates, or special personal discounts, and employees may not purchase goods or services for their own use by using the Company's account with suppliers.

Acceptance of Gifts

Employees are prohibited from soliciting or accepting gifts, money, or any personal benefit from suppliers or potential suppliers. On rare occasions, employees may accept unsolicited non-cash gifts of less than \$20 in value from clients, customers, or suppliers, provided that the employee does not reciprocate with any Company goods, services, or promises of future business.

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If a gift of more than \$20 in value is offered to the employee, the employee must report the gift to his/her District Manager, who will make the determination of whether the gift may be accepted.

Employees may accept unsolicited entertainment that may be offered out of the ordinary course of business, but only if the entertainment occurs infrequently and it involves reasonable costs.

Political Activities and Contributions

Employees are encouraged to participate in the political process in every way as individuals and when not on Company time or engaged in Company business. Employees must make every effort, however, to not make an impression that they speak or act for Guest Services.

Company funds may not be used by any employee to support a political candidate or party, and no employee shall make any form of payment to any public official as an incentive to amend, enact, or defeat a law or regulation.

Reporting of Violations

Employees are required to alert Guest Services about any potential unethical, unsafe, or illegal behavior they may witness or become aware of in the workplace or by Guest Services' employees. Employees may make this report to the Vice President or Director of Human Resources, or by contacting the GSI Helpline at (877) 220-1672. The GSI Helpline is available 24 hours a day, seven days a week, and able to assist employees in many different languages.

Although employees may make these reports anonymously, employees are required to give enough details about the potential unethical behavior so that a thorough and timely investigation is possible. Knowingly or willfully concealing unethical behavior, or making a false or misleading statement in connection with Company matters, documents, records, investigations, or business relationships is prohibited.

Employees who have questions about this Code of Business Conduct and Ethics, or who would like to discuss a situation to determine in advance whether it would violate this policy or not, are encouraged to contact the Vice President of Human Resources at (703) 849-9380.