



Company Policy

G&K Confidential

Content Identification and Title:

G&K Services Code of Ethical Conduct

Rev	Description of Change	Doc Owner	Approver	Date
D	Updates to Policy	Linda Newman, Director of Internal Audit	Jackie Punch, SVP of Human Resources, and Jeff Wright, CFO	07/01/11

1. Policy Statement

The manner in which G&K Services' employees conduct business is extremely important to its success. G&K has certain responsibilities to itself, its customers and shareholders, and to the communities in which it does business. In order to effectively conduct business, G&K must conduct its business in the most ethical manner possible.

2. Policy Scope

This policy applies to all G&K employees, officers and directors (collectively referred to herein as employees).

3. Policy Intention

G&K has identified five core values which will govern its behavior. These values are:

- Focus on always satisfying **customers** by achieving outstanding quality in all we do
- Operate with **integrity**, especially ensuring **safety** and **environmental stewardship**
- Help **people** and **teams develop** and **succeed** together
- Feel an obligation to speak up, challenge, listen, and be **open** with each other
- Drive **profitable growth** through simple, focused, fast **execution**

It is expected that all G&K employees will embrace and adhere to these values when conducting business on behalf of G&K. Whenever an ethical conflict arises, the commitment to act with honesty and integrity supersedes all other company expectations and responsibilities. Even the appearance of impropriety should be avoided.



The following areas are addressed in the Code of Ethical Conduct:

- Compliance with the Law and Whistleblower Policy
- Employee Responsibility
- Equal Employment Opportunities (Employment Equity Opportunities – Canada)
- General Business Conduct
 - Customer and Supplier Relations
 - Gifts and Gratuities
- Conflict of Interest
 - Competitors and Vendors
 - Employment of Relatives
 - Outside Interests and Activities
- Protecting Proprietary and Confidential Information
- Fair Competition
- Insider Trading
- Record Keeping and Financial Reporting
- Use of Company Assets
- Health and Safety
- Environmental Stewardship
- Political Activities
- Government, Analyst, and Media Inquiries

Compliance with the Law and Whistleblower Policy

G&K strives to provide employees with a work environment which is compliant with applicable laws, rules and regulations. It is the desire of G&K to create an environment where employees understand the expectations and feel comfortable bringing attention to legal issues or policy violations and report them to a member of G&K's management. Every effort will be made to thoroughly review and resolve every issue or violation brought forward.

G&K will not tolerate retaliation in any form for reporting a suspected violation of law, regulations or company policy, including, without limitation, accounting and auditing matters. An employee who brings forward a concern or contributes additional information under the Code of Ethical Conduct will be treated with dignity and respect. However, G&K reserves the right to discipline any employee who knowingly makes a false accusation, provides false information or has acted improperly.

Employee Responsibility

Each employee of G&K is expected to be familiar with and comply with policies established by G&K. In addition, employees must comply with laws and regulations at all times. Therefore, any employee who is not sure if they are in compliance with company policy and/or the law must obtain a clear understanding prior to taking any action. It is imperative that the reputation of G&K and its employees not be compromised at any time.

Managers and supervisors are expected to ensure that employees are informed of their responsibilities and monitor compliance. Every employee of G&K has an obligation to promptly bring violations and suspected violations of applicable laws, rules or regulations, G&K policies and the Code of Ethical Conduct to the attention of G&K through any member of management or G&K's anonymous reporting system (MySafeWorkplace). Employees at all levels are prohibited from retaliating against or threatening anyone for reporting or supplying information about a policy or conduct concern.

G&K has established and will maintain a written program to ensure compliance with applicable laws, rules or regulations and with these and other policies the company may adopt. The written program consists of, among other things, the G&K Services Code of Ethical Conduct, training programs, periodic audits and the MySafeWorkplace anonymous reporting line. The reporting line is available to all employees at (888) 281-9628 or www.mysafeworkplace.com to report conduct believed to be in violation of the Code of Ethical Conduct. Information provided through this process will be reviewed thoroughly

and timely resolution will be attained. Identity of the source of information will remain confidential unless there is a need to know or a requirement to disclose as required by law.

Adherence to applicable laws, rules and regulations at G&K is a condition of employment for every G&K employee. Violation could expose the company and employee to civil and criminal liability and result in harm to the company's reputation and competitive position. Violations will be handled promptly and may result in disciplinary action up to and including termination of employment.

Equal Employment Opportunities (Employment Equity Opportunities – Canada)

G&K makes every effort to treat all employees and job applicants fairly. Individual qualifications, skills and achievements are the basis for employment decisions, such as hiring, promotion, transfer and compensation.

G&K works to provide equal employment opportunities regardless of race, sex, age, religious orientation, marital status, citizenship status, national origin, physical/mental disabilities or any other classification protected by applicable law. G&K believes that diverse ideas, skills and experience complement each other and continually improve its ability to develop and to serve its customers. Questions regarding Equal Employment Opportunities or Employment Equity Opportunities can be directed to a human resources manager or director.

General Business Conduct

Customer and Supplier Relations

As an employee of G&K, it is necessary to maintain professional business relationships with its customers and suppliers. Therefore, the following items should be considered inappropriate in day to day operations:

- Taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other unfair practice.
- Communicating an untruth in any business relationship.
- Receiving improper personal benefits as a result of one's position with the company.

Gifts and Gratuities

Whenever an employee deals with a supplier, customer or government agency, the employee has an obligation to act in the best interests of the company. The purpose of business entertainment and gifts in a business setting is to create goodwill and sound working relationships, not to gain an unfair advantage. Gifts or gratuities presented in a manner that implies or requires an obligation on the part of the recipient are not acceptable. No one shall offer, give, ask for or accept—directly or indirectly—payment, favors, gratuities or any other thing of value to or from an employee or agent of any current or potential customer or supplier, except as legally permissible and recognized as courtesies of the trade.

Business courtesies and gratuities include, but are not limited to, gifts, meals, cocktails, discounts, hospitality, entertainment, recreation, tickets, promotional items, transportation, and any tangible or intangible "item of value" for which the recipient does not pay fair market value.

The following are considered acceptable courtesies:

- Normal business meals consistent with G&K's established guidelines.
- Entertainment (individually or in the aggregate) that does not exceed \$400 during any 12-month period. Anything exceeding this value must be approved in writing by the Vice President and General Counsel, with notification going to the Director of Internal Audit.

Under no circumstances may an employee give or receive cash, offer or give – directly or indirectly – gifts of any value to an employee or agent of the government, or give gifts or business courtesies to those customers or suppliers, where their company has a policy forbidding gifts.

Conflict of Interest

Employees are considered to have a “conflict of interest” when they place themselves in a position where they are forced to choose between financial gain for themselves (or a member of their family or other third party) or G&K’s businesses. Employees should avoid all situations that have or appear to create a conflict of interest. Employees must fully disclose to their supervisors any actual or potential conflicts of interest.

It is imperative that business decisions and actions not be made with the intent of affecting an employee’s personal finances (i.e., personal gain). It is equally important that financial decisions of a personal nature do not have an adverse effect on the company.

The following are examples that G&K considers unacceptable activities as related to conflict of interest.

Competitors and Vendors

- Borrowing or being financially indebted to a competitor or a company that supplies G&K with goods or services.
- Owning substantial amounts of stock or having voting stock in a company or group that has a financial relationship with G&K, such as a supplier of goods and services, or a customer (more than 2%). (Note: subject to the following, it is acceptable, however, to own small amounts of stock in any company that is traded on a nationally recognized stock exchange.)
- Owning, purchasing or holding any stock or other debt or equity securities in any of G&K’s primary competitors.

Employment of Relatives

- Permitting relatives of employees, contractors or vendors to work in the same department or in a position that presents a real or perceived conflict of interest. At no time may relatives work in a direct reporting relationship or have management/supervisory responsibilities to them. Employees who marry also fall under these guidelines.
- Hiring, or pressuring another company employee to hire, a family member or close friend as a consultant or employee.

Outside Interests and Activities

- Acting as a contractor, or providing other services, to G&K while employed by G&K.
- Working simultaneously for a competitor, customer, or supplier.
- Employment or membership in another organization that may interfere with job performance, utilize company property, involve company sponsorship or create the possibility of adverse publicity.

Protecting Proprietary and Confidential Information

Confidentiality is required for G&K’s information. Most of the information to which employees have access or develop on the job is proprietary. It is G&K’s property and a valuable business asset. Proprietary information of G&K may never be used for personal gain during or after employment with G&K.

Proper precautions must be taken to protect G&K’s proprietary information. Unauthorized disclosure could destroy its value to the company and give unfair advantage to others. Employees are all responsible for protecting this information. Disclosure should be limited to those who have a need to know based on job responsibilities.

Proprietary information requiring protection includes, but is not limited to, any information not generally known about G&K’s business, such as customer and supplier lists; financial data; sales reports; materials developed for in-house use, such as specific software and equipment; administrative and manufacturing processes; business plans; pricing strategies and lists; devices; communications, including internal communications, whether oral or in writing, speeches, or other presentations made or disseminated by G&K personnel, including electronic copies thereof; and compilations of information which give G&K a competitive advantage.

In addition, information pertaining to future, current and past employees must be held in strict confidence. Only those with a need to know shall have knowledge of such information. Verification of employee information must be coordinated

through the corporate Human Resources department. Any employee who knowingly alters, falsifies or misrepresents employee information shall be subject to disciplinary action up to and including termination.

Unless previously specifically authorized, employees are prohibited from making statements on behalf of G&K and from using G&K's intellectual property, including trademarks and logos. Additionally, employees must consider their obligations to maintain confidentiality regardless of the forum of disclosure, including, but not limited to, social media outlets such as Facebook®, MySpace®, Twitter®, Internet chat rooms and weblogs. Employees remain legally responsible for all comments posted or disclosed. If an employee makes any comments about G&K, the employee should disclose his or her affiliation with G&K and must include a disclaimer noting that the view expressed is that of the employee and does not necessarily reflect the view of G&K. Responsibility to keep all information confidential continues after separation from employment with G&K.

Any situation, in which G&K's proprietary or confidential information has or may have been compromised, must be reported immediately to G&K's General Counsel or via MySafeWorkplace anonymous reporting line at (888) 281-9628 or www.mysafeworkplace.com.

Fair Competition

Antitrust laws in the U.S. and competition laws outside the U.S. exist to ensure free and open competition in the marketplace. G&K fully supports this principle, as it is an integral part of maintaining high ethical standards.

Employees may not take any collaborative action with a competitor, or take any action that could have an improper anti-competitive effect. Examples of prohibited conduct include:

- Agreements or understandings with competitors, either directly or through others, to fix prices, divide customers or territories, or restrict sales;
- Exchange of pricing or other proprietary information with competitors, such as terms of sale, allocation of market share, or company cost structure; and
- Illegal price discrimination or refusals to deal. G&K's goods and services must be made available to its customers on a similar basis.

Employees shall not make false or misleading statements about a competitor or its products, business practices, financial status or reliability.

G&K's management is expected to maintain basic familiarity with the principles and purposes of the antitrust laws as they apply to G&K's business, and to abstain from any activities that might violate or create any appearance of intention to violate such laws. G&K employees are expected to understand the antitrust principles that apply to their activities. Violation of these laws can result in civil liability and criminal penalties for G&K and its employees.

Insider Trading

All G&K employees are prohibited from engaging in insider trading. Insider trading is trading G&K stock while aware of confidential "inside" information about the company that could, if it became public, affect the stock price. "Inside" information is considered to be anything an investor would consider important in making a decision to buy or sell a company's stock (e.g., projected earnings, dividends, new equity or debt offerings, proposed acquisitions or divestitures.

Disclosure of any information to another person, such as family members, friends, or brokers, which would enable them to gain a trading benefit not available to the general public, is prohibited as well. Employees may not disclose inside information in any form, including, without limitation, via electronic mail, Internet chat rooms or weblogs, or through any social media outlet available on the Internet, such as Facebook®, MySpace® or Twitter®. Similar restrictions apply to trading in the stock of other companies using confidential information that an employee has access to because of his or her employment with G&K. Regulations, which are designed to protect the investing public, are strictly enforced, and misconduct could subject the employee and G&K to civil liability and criminal penalties.

For further details on insider trading, refer to G&K 's Policy on Avoidance of Insider Trading.

Record Keeping and Financial Reporting

G&K business units will maintain accurate company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities. Records and accounts must be complete and not misleading. All G&K accounting records, and the reports produced from those records, must be kept and presented in accordance with all applicable laws and relevant accounting standards. Any questions related to financial records and accounting practices should be forward to the Vice President and Controller.

No undisclosed or unrecorded funds or assets of G&K may be maintained for any purpose. No more than one set of books may be maintained (except with respect to when a separate set of records is required for tax purposes, as required by tax law) and no false or artificial entries may be made in any accounts. All employees are responsible to report all fraud and instances of lack of internal control to a member of management, Internal Audit or MySafeWorkplace.

Use of Company Assets

As an employee of G&K, protecting the assets of the company is a key responsibility. All employees are responsible to use good judgment in the manner in which they use any company asset, and must safeguard against loss, damage, misuse, or theft. Care should be taken to ensure assets are not misappropriated, loaned to others, sold or donated, without proper authorization. Examples of G&K assets include company funds, inventories, fixed assets, computers, and software.

Health and Safety

Maintaining a safe, healthy, and accident free environment is a primary commitment of G&K. Safety is everyone's responsibility. All employees are expected to conduct their duties and responsibilities in compliance with applicable law and industry standards relating to health and safety in the workplace. For further details on G&K's commitment to the health and safety of its employees, see G&K's Safety Policy.

Environmental Stewardship

G&K is committed to doing business in an environmentally responsible manner and will strive to improve its performance to benefit its employees, customers, communities, shareholders, and the environment. All employees are responsible for making sure that G&K's business is conducted in compliance with all applicable laws and in a way that is protective of the environment. For further details on G&K's commitment to the environment, see G&K's Environmental Stewardship Policy.

Political Activities

Employees are encouraged to participate in political activities. It is important for all G&K employees to be aware of the issues that affect the communities in which G&K does business and to promote political candidates that employees believe will perform in their and the company's best interests.

Subject to the terms of G&K's No Solicitation/Distribution Policy, employees may not conduct campaign activities nor solicit contributions for any political party, political committee or candidate for public office during work hours or on G&K property.

Government, Analyst and Media Inquiries

Occasionally, employees may receive an inquiry from the media, financial community, government agency or other outside sources. All inquiries from the financial/analyst community should be referred to the Company's Director of Investor Relations. All other requests should be directed to its Vice President, General Counsel and Corporate Secretary.

Summary

All employees are expected to read and understand this policy and use it as a basis for performing ethically. It is the responsibility of all employees to report any activity that may be an exception to this policy.

All employees are to seek guidance from G&K management, Human Resources, Internal Audit or Legal in any circumstances where doubt exists.