Code of Conduct

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Introduction

Why Do We Have a Code?

Acting ethically is good for business and a competitive advantage. It protects our brands and reputation in the marketplace. But how do we know what’s expected of us? Just as ServiceMaster’s commitment to performance is driven by our Winning Behaviors, our Code of Conduct is our guide, showing us how to make ethical decisions. Our Code points us in the right direction – the ethical direction.

As you review the Code, keep in mind the various commitments ServiceMaster has made to its valued stakeholders. We each play a role in maintaining the trust of our customers, business partners, investors, communities, ServiceMaster and, of course, each other. It’s our Code and, therefore, our responsibility.

Who Is Expected to Follow the Code?

We are all expected to follow the Code. Our Code applies to all ServiceMaster employees, contractors, officers and directors. We expect our suppliers, agents, business partners, consultants and licensees/franchisees to uphold similar principles in the work they perform on behalf of ServiceMaster.

What Responsibilities Do We Have Under the Code?

Our Code is only as effective as those who follow it. Everyone must:

• Follow our Code, company policies and the law at all times – even if someone asks us to do otherwise.
• Uphold the principles in our Code and ServiceMaster’s policies and procedures.
• Understand that there is no excuse, including ignorance or “everyone else is doing it,” to act illegally or unethically.
• Speak up if we know or suspect that a violation of our Code has occurred.

Remember, no single document can cover all the situations we may encounter throughout the course of our work. It is critical to use common sense and good judgment, in conjunction with this Code, to best uphold our responsibilities to ServiceMaster and our stakeholders, and to know when to ask for help. This Code is a starting point. Our policies and procedures provide more detailed information on the referenced subjects. If a topic is relevant to your work at ServiceMaster, you are expected to review, understand and follow the applicable policies and procedures.

Setting the Right Example: Managers Have Added Responsibilities

While our Code applies equally to all of us at ServiceMaster, managers do have additional responsibilities. Make it your goal to promote a positive, ethical workplace. If another employee approaches you with a concern and you are unsure of how to address the issue, seek guidance from your supervisor or another resource within ServiceMaster, such as your Human Resources manager or the Ethics Office.
As leaders, managers are expected to:

- Promote an open door policy so employees feel comfortable asking questions and voicing concerns.
- Train employees on the Code and relevant ServiceMaster policies and procedures.
- Respond to the concerns expressed by employees, escalating issues when necessary.
- Keep an eye out for misconduct, never excusing or promoting violations of the Code or the law.

What Are the Consequences of Code Violations?

ServiceMaster takes violations of the Code seriously. Code violations can have severe consequences for both ServiceMaster and those involved. In addition to damaging the ServiceMaster brand, actions that violate our Code may also violate the law and have an impact on both the individual involved and ServiceMaster. These consequences could include civil and criminal liabilities such as possible jail time. Failing to follow our Code also means ServiceMaster may take disciplinary action, up to and including termination.

What happens if someone violates our Code?

We are all responsible for living up to the high standards of ethical behavior set out in our Code, and for being accountable in all we do. When one person fails to adhere to our Code, it has the potential to reflect negatively on the entire company. That is why ethical behavior and personal integrity are core to our culture. The company investigates all reported violations of our Code and takes appropriate remedial action where necessary.

QUESTIONS OR CONCERNS?

Call the Ethics Helpline 1-800-937-9888. This number can be reached 24 hours a day and translators are available. Make it your goal at all times to promote a positive, ethical workplace. If you are unsure of how to address an issue, seek guidance from your manager or another resource within ServiceMaster, such as our Ethics Helpline.
Asking Questions and Raising Concerns

Where Do We Go to Raise Concerns or Seek Advice?
It’s important that each of us feels comfortable raising a concern or asking questions.

If you believe you have witnessed actual or possible misconduct, or if you have a question about the Code, ServiceMaster policies or the law, use the following resources:

1. Refer to written policies for guidance, in addition to this Code and the ServiceMaster Employee Handbook.
2. Talk to your manager. If doing so is uncomfortable or inappropriate under the circumstances, follow up with your manager’s immediate supervisor.
3. Contact your Human Resources manager.
4. Call the Ethics Helpline at 1-800-937-9888 or use servicemaster.ethicspoint.com. If you are uncomfortable with other available channels or feel a response is inadequate, contact the ServiceMaster Ethics Helpline (even anonymously). The Ethics Helpline can be reached 24 hours a day and translators are available.
5. Ask for access to the We Listen program. If you think your dispute or issue raised through other channels has not been resolved adequately, you may access the We Listen program, where you will be assisted by a company ombudsman. Talk to your manager or the Ethics Office about this option.

ServiceMaster Reviews All Concerns
If you submit a report, the matter will be promptly reviewed. Questions or concerns received through the Ethics Helpline or web portal are reviewed by the Ethics Office and routed to the appropriate department for handling with oversight by the Ethics Office. We often partner with Audit, Human Resources or Employee Relations to gather information necessary to help resolve the matter. The information is kept confidential, however, disclosure may be necessary when required by law or where needed to properly examine or adequately respond to a question or concern.

You may also submit concerns anonymously. However, anonymous complaints are more difficult to adequately address.

We will appropriately investigate allegations of noncompliance with laws, regulations, company policy and the Code. All employees, including officers and directors, must fully cooperate with any investigation.

Any waiver of this Code for an executive officer or director may be made only by the Board of Directors or a Board Committee and will be promptly disclosed if required by law.
We Are Safe from Retaliation When Raising a Concern

Employees should always feel confident when making a good faith report and never fear retaliation. Making a report in “good faith” means you provide all the information you have and you have an objectively reasonable belief that your report is true. ServiceMaster encourages you to come forward with good faith concerns and will not tolerate any act of retaliation. The same applies to anyone who participates in an investigation.

If you believe you or another ServiceMaster employee has experienced retaliation, it’s important to speak up. ServiceMaster may take disciplinary action, up to and including termination, against anyone who engages in retaliatory acts against another for making a good faith report of a suspected violation of the Code or the law.

What if...

Several of my teammates and I are uncomfortable when our team leader tells ethnic and nationality jokes. Is this all right? What should we do?

Dealing directly with the situation is generally the best way to resolve it. You should tell your team leader his or her behavior makes you uncomfortable and you would like it to stop. If you feel you cannot speak directly to the person in question, talk to your supervisor’s manager or to Human Resources. You can also contact the Ethics Helpline. ServiceMaster does not tolerate harassment or other inappropriate behavior in our workplace.

The “We Listen” Program

We Listen is the ServiceMaster dispute resolution program for resolving legal disputes involving work-related issues, including discrimination, harassment, retaliation, wrongful discharge, wage and hour and other workplace related claims. If you think your dispute or issue raised through other channels has not been resolved adequately, you can access the We Listen program, where you will be assisted by a company ombudsman.

To initiate We Listen, contact your Human Resources manager, the Employee Relations department, the Ethics Office or the Ethics Helpline. We Listen program details and procedures are available on the employee intranet.

The Ethics Helpline is always available.
1-800-937-9888 • servicemaster.ethicspoint.com
Our Culture

Companies have a competitive edge when employees want to do the right thing. By understanding what’s unique about our history and committing to ServiceMaster’s Winning Behaviors, we have built a culture of performance and accountability. Here’s how we’ll continue to build on our success.

We Treat Each Other with Respect

At ServiceMaster, we are committed to providing a work environment where everyone is encouraged to reach their full potential. We treat each other with respect.

Diversity Makes Us Stronger

Diversity embodies all the differences that make us unique, including, but not limited to, race, color, religion, national origin, age, gender, familial status, disability status, veteran status, genetic information, gender identity and sexual orientation.

At ServiceMaster, we strive to maintain a culturally diverse workforce because it reflects the diversity of the various communities in which we conduct our business. Working with employees from diverse backgrounds improves our thinking, makes us more creative and allows us to better achieve our collective goals for not only our employees but also our customers and shareholders.

We accomplish this, in part, by promoting a strict policy of non-discrimination. ServiceMaster makes all employment decisions based on merit, and never on the basis of a person’s individual characteristics or any other classification protected by law.
We Cultivate a Workplace Free from Harassment

Treating each other respectfully means we cultivate a workplace free from harassment. Harassment is defined as any unwelcome conduct that creates an offensive or hostile work environment. It can be physical, verbal, written or visual – such as through distasteful pictures or videos. Harassment is offensive and will not be tolerated in any form at ServiceMaster.

If you experience or become aware of any act of discrimination or harassment, you have an obligation to report it immediately. Remember, retaliation for making a report of misconduct in good faith will never be tolerated.

What if…

A fellow employee enjoys reading lewd or obscene emails at work. She only reads them when working late, but then often forwards them to friends. She assumes since she is doing this after normal working hours it is okay. Is this right?

ServiceMaster policy prohibits behavior that could create an offensive work environment or use of our computer systems to transmit any offensive materials regardless of the time of day.

We Protect Each Other’s Private Information

One way we show respect to our colleagues is by protecting their personal and private information at all times. Company systems and files contain a variety of sensitive personal information necessary to conduct everyday business. This includes health information, banking and government identification numbers, compensation and taxation data, family information and personal contact information. If your job requires access to this type of sensitive personal information, it’s your responsibility to safeguard the information and only use it to the extent necessary to perform your duties. This responsibility does not restrict the rights of employees to discuss the terms and conditions of their employment with others.

We Ensure the Health and Safety of Our Employees

ServiceMaster is committed to providing a safe and healthy workplace. Accordingly, we are responsible for following safety policies and protocol. We have a duty to report any unsafe conditions immediately so ServiceMaster can take steps to correct the situation as soon as possible. Familiarize yourself with the Environmental Health and Safety Policy as well as the Stop Work Policy.
The following are special areas of concern:

**Personal Safety** – It is your responsibility to protect yourself, your fellow employees and our customers from injuries and illnesses. This can be done following safe work practices that have been presented to you during initial and ongoing training.

**Product Safety** – Some of the products we use can pose a risk to employees or to others if used improperly. Always follow the safety precautions and label requirements when using, storing, transporting and disposing of these products.

**Personal Equipment Safety** – Some of our activities can pose a risk to employees. In many situations, Personal Protective Equipment (PPE) and associated training are provided to eliminate or minimize this risk. It is important to properly use the PPE that’s provided.

**Vehicle Safety** – ServiceMaster has one of the largest commercial fleets of vehicles in the United States. It is important that we operate these vehicles responsibly and obey traffic laws and regulations. Our vehicles must be inspected regularly to ensure they are safe to operate, and our drivers must be appropriately licensed and qualified. We also must ensure that driver qualifications, vehicles and maintenance procedures meet Department of Transportation requirements, where applicable.

**Drug-Free Workplace** – Ensuring a safe and healthy workplace requires clear judgment and alertness. Drugs and alcohol can impair this. Being under the influence of either while at work can affect everyone’s safety. For those reasons, ServiceMaster has a zero tolerance policy for employees who possess, distribute or work under the influence of alcohol or drugs, including certain prescription drugs, while conducting any ServiceMaster business or operating ServiceMaster vehicles or machinery.

**Workplace Violence** – ServiceMaster takes the physical safety of employees and visitors extremely seriously and does not tolerate violence in any of its facilities or locations. Violent or threatening behavior of any kind – including carrying a weapon – is strictly prohibited while on ServiceMaster premises or conducting ServiceMaster business off-site. If you feel threatened while at work, notify your manager or Human Resources manager. If you or anyone else is in immediate danger, call the local authorities before reporting the incident through normal channels.

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**What if...**

You notice someone leaves a confidential employee file in a break room or conference room? What should you do?

We are all responsible to protect each other’s privacy. Confidential records should always be safeguarded. Return the file to Human Resources without looking at the contents.
Company and Shareholders

As ServiceMaster employees, officers and directors, we have a personal stake in the company’s success. It’s important to act in ServiceMaster’s best interests at all times.

Conflicts of Interest

One way to act in ServiceMaster’s best interests is to avoid conflicts of interest. “Conflicts of Interest” occur when personal interests interfere with the ability to make objective decisions for ServiceMaster. Please reference ServiceMaster’s Conflict of Interest Policy to view additional details.

We Do Not Allow Personal Relationships to Improperly Influence Our Judgment

To avoid the appearance of favoritism, managers may not supervise or make employment decisions regarding a person with whom they have a close personal relationship. Such a relationship is also prohibited if it would create a situation where one employee could affect the work of another. Either of these situations would be considered a conflict of interest.
What if...

My brother’s company is seeking to become a supplier to ServiceMaster. Does this create a conflict of interest?

If you have decision-making authority in the supplier selection process or with respect to your brother’s company, a conflict of interest exists. Even if you don’t have such authority, this relationship may create the appearance of a conflict of interest. You should report the situation to the Ethics Office and your manager and remove yourself from the decision-making process.

We Do Not Allow Personal Financial Investments to Improperly Influence Our Business Judgment

When those with whom you have a close personal relationship have a significant financial interest in any organization that does business with ServiceMaster, it creates a potential conflict of interest—or the appearance of one. If you or someone with whom you have a close personal relationship has a significant financial interest in a business that intends to do business with ServiceMaster, you must disclose it in writing to your supervisor and the Ethics Office prior to starting any discussions involving that business and ServiceMaster. This includes organizations that compete with ServiceMaster. Avoid making decisions that might be influenced by such a relationship.

We Do Not Allow Outside Employment to Improperly Influence Our Judgment

Part of acting in ServiceMaster’s best interests means employees cannot engage in any outside work that interferes with their ability to perform their work. It also means that employees cannot be employed by a supplier, business partner or competitor of ServiceMaster. If you are considering taking up outside employment that you suspect might create a conflict, you must disclose the situation to your manager, Human Resources and the Ethics Office promptly.

We Do Not Take Corporate Opportunities for Ourselves

We all have a duty to ServiceMaster to advance its interests. Competing with ServiceMaster or any of its businesses creates a conflict of interest. If you are aware of a business opportunity that may be of interest to ServiceMaster, you cannot personally, or through a competing company, take that opportunity for yourself.
We Exercise Caution When Giving or Receiving Corporate Gifts

Business gifts and entertainment are courtesies frequently used to build corporate goodwill. Often, these courtesies are appropriate. However, a conflict of interest arises if these courtesies suggest favorable treatment was sought by, received from or given to individuals or organizations that do business or seek to do business with ServiceMaster. Our business decisions should be unbiased and must be made based on the best interests of ServiceMaster. For that reason, both the giving and receipt of gifts and entertainment must be moderately scaled and infrequent. They must also be clearly intended to facilitate goodwill in our business relationships and not to influence the award of a particular piece of business. We do not allow gifts and entertainment to improperly influence our judgment. When in doubt, seek advice from your business unit legal representative and the Ethics Office.

Keep the following principles in mind to avoid a conflict of interest when receiving gifts:

- Gifts valued at more than $25 or the equivalent must receive written approval from the recipient’s immediate supervisor before they are accepted. For gifts greater than $500, further management approval is needed. Refer to the Conflict of Interest Policy for more information.
- We may accept common courtesies (such as occasional meals and entertainment at sports, musical and theatrical events), but only to the extent usually associated with accepted business practices.
- It’s never okay to accept a gift in cash or cash equivalents, including gift certificates or gift cards.
- No gift, favor or form of entertainment received should expose ServiceMaster or individuals within ServiceMaster to undue reputation risk if made public or to physical harm.

Nominal expenditures for gifts and entertainment may be made if they meet the following conditions:

- They are allowed under the policies of the recipient’s organization.
- They are of sufficiently limited value, not given regularly to a recipient, are not given to influence the award of a particular piece of business and in a form that will not be improperly construed as a bribe or payoff.
- They are accounted for properly in our books and records. Gifts of cash and cash equivalents are always prohibited.

What if…

You’re out at lunch with your department and your manager asks you to pick up lunch on your PCard. “Don’t worry” she says, “I’ll approve the charges.” Should you buy lunch?

The highest-ranking employee at a business meal should always pay for the meal, unless each attendee is paying separately. It is inappropriate for managers to either direct or approve expenses when in attendance.

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<tr>
<th>Value Range</th>
<th>Approval Needed</th>
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<tr>
<td>&lt; $25</td>
<td>No approval needed</td>
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<tr>
<td>$25-$500</td>
<td>Direct manager approval required</td>
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<tr>
<td>&gt; $500</td>
<td>Ethics Office and BU/function lead approval required</td>
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Protecting Company Assets

We Use Our Company's Assets and Information Appropriately

Internal communications, as well as proprietary software programs, are assets that must be protected, often using patents, copyrights and trademark of intellectual property (IP). IP is also safeguarded through the proper use of our network and computer systems and by keeping confidential information secure. As a ServiceMaster employee, it’s essential to safeguard company assets against theft, damage and loss. It’s also essential to use or access company assets appropriately and only for legitimate business purposes.

We Properly Use Company Computer Systems

ServiceMaster provides computer hardware, such as desktops, laptops, handhelds and other equipment necessary to perform your job. These tools are ServiceMaster property and should be used in connection with your responsibilities as a ServiceMaster employee. While occasional use of ServiceMaster technology systems for legitimate personal purposes (such as an email to a family member) is permitted, there are other uses that are not. ServiceMaster reserves the right to monitor your use of company technology to ensure it’s used in connection with business purposes.

Additionally, you’re expected to use the Internet in an ethical manner, and not for recreational, unauthorized, illegal or immoral purposes, or to download any sexually suggestive or explicit material. ServiceMaster reserves the right to block access to inappropriate websites, as well as the transmission of inappropriate emails or files. For more information, review the Information Security Policy.

YOU SHOULD NOT EXPECT ANY PERSONAL USE OF SERVICEMASTER INFORMATION SYSTEMS TO BE PRIVATE.

What if...

What if my family and friends email me at work? Since these are personal messages can I expect them to remain private on my company computer?

Although you may use your ServiceMaster computer for incidental personal use, remember ServiceMaster owns your computer and all information stored on it. As such, you have no expectation of personal privacy. To the extent permitted by law, ServiceMaster may review network activity on anything stored on your ServiceMaster computer at any time.

Protecting Confidential and Proprietary Information

Information is one of ServiceMaster’s most valuable assets. Corporate confidential and proprietary information includes information not generally known to the public. This information includes sensitive and unpublished financial information, customer lists, pricing strategies, supplier information, processes, business plans, potential acquisitions, marketing strategies and trade secrets. It also includes more publicly available information such as our services and products, copyrights and trademarks. Your obligation to protect all such information continues even after your employment with ServiceMaster ends.
Honest Books/Records

We Maintain Honest and Accurate Books and Records

Investors rely on ServiceMaster employees to maintain accurate records and to submit full, fair, timely and understandable financial disclosures to the public markets, relevant government agencies and regulatory bodies. Every transaction contributes to the overall picture of ServiceMaster’s financial status, so it is crucial we are accurate in all of our ledgers, reports, invoices and receipts. You can ensure utmost honesty in these records by following ServiceMaster policies and procedures, as well as the laws and regulations, which govern our financial accounting and reporting.

As important as it is to enter only accurate and truthful information into our records, it’s just as important that the records are properly maintained. We do this by following the Record Retention Policy, which addresses the length of time certain types of records must be retained, as well as proper maintenance, disposal and destruction procedures.

We may be informed our records are necessary for an internal or external audit, investigation, government inquiry or litigation. Never destroy, alter or attempt to conceal any records in your possession in response to such notice. Interfering with an audit, investigation or litigation is against company policy and the law, and can lead to serious consequences, including criminal charges and imprisonment, for the individuals involved and for ServiceMaster.

Speaking on Behalf of Our Company

We Communicate as One Company

From time to time, a member of the media may contact ServiceMaster for comment or reaction to a news story, either for traditional or social media. Often, the media will seek comment from the first person it can reach. Since not every employee is authorized to speak on behalf of the company, only designated spokespersons may speak on behalf of ServiceMaster and its businesses. Funneling all media inquiries through a designated spokesperson helps ensure that any public statement is presented in a consistent manner. If you receive an inquiry from the media, refer it immediately to the Corporate Communications Department or the media hotline at 1-866-397-7921 or corporate.communications@servicemaster.com. Inquiries from investment analysts should be referred to the Vice President of Investor Relations.

Also, when sending emails, keep in mind that electronic messages can be altered and forwarded without your consent. Ensure when posting to blogs, social networking sites or chat rooms that the message does not contain any company confidential or proprietary information. It’s also a good idea to remember, when using social media sites such as Facebook, Twitter, YouTube and Instagram, any references to your employment with ServiceMaster may suggest an official company position. For that reason, you should always make it clear you’re not speaking as a representative of ServiceMaster. For more information, please review ServiceMaster’s Social Media Guidelines.

Who keeps company and customer data secure?
YOU.
In addition to our Code and ServiceMaster’s policies and procedures, all employees have a duty to uphold the law. Laws can be complex and vary from one state or country to the next. This makes it all the more important to be familiar with the laws and regulations that apply to your specific job.

Competition Laws

We Compete Ethically and Lawfully
At ServiceMaster, while we are passionate competitors, it’s important to compete ethically and follow the antitrust and competition laws in every jurisdiction where the company does business. These laws are meant to preserve a free and fair marketplace. To live up to the letter and spirit of these laws, certain topics must never be discussed with competitors.

These include:

- The division or allocation of markets, territories or customers.
- Prices or price-related strategies (including marketing information).
- The boycotting of a supplier or other third party.

Keep in mind, even the appearance of collusion can result in a lawsuit or government investigation. Accordingly, you must be diligent whenever you interact with our competitors. If a competitor brings up any of these topics in conversation, you must stop the conversation and immediately report the incident to the Ethics Office or your business unit legal representative.

What if...

Sarah attended a trade show. While there, she visited with her friend George, who works for a competitor. During a break, George hinted that if Sarah could get ServiceMaster to charge more for certain services, he’d make sure his company would make a similar move. How should Sarah have responded?

Sarah should have immediately stopped and told George their conversation was not a proper business discussion. She should have excused herself from the conversation and promptly reported the conversation to the Ethics Office or her business unit legal representative. Such conversations may violate antitrust laws and potentially carry severe consequences for both the individuals involved and ServiceMaster.
Competing with Integrity

Competing with integrity also means gathering information about competitors in an ethical manner. While it may be easier to reach business goals when we are aware of what the competition is doing in the marketplace, it is never appropriate to learn this information through theft, misrepresentation or deception. It is also never acceptable to pressure colleagues to divulge the confidential information of their former employers. If you do happen to encounter confidential information about another company you are not entitled to know, seek guidance from your business unit legal representative before passing it along or acting upon this information.

We Will Conduct Business in an Exemplary Manner

ServiceMaster complies with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act of 2010, prohibiting the payment of bribes. For this reason, it is crucial you do not offer, authorize, give or promise any form of bribe or kickback, particularly to any government officials. “Government officials" include national or local government employees, political candidates or employees of government-owned businesses or their representatives.

A “bribe” is anything of value – such as cash, favors or entertainment – used to influence a person’s judgment or conduct. The U.K. Bribery Act also classifies as a bribe any “facilitating” or “grease” payment made to a government official (as opposed to a payment to a government agency) in exchange for a routine governmental service, such as issuing a permit. ServiceMaster has a simple policy: We do not bribe.

Employees cannot attempt to bypass anti-corruption laws by hiring third parties to do something the company is not allowed to do itself. Remember, ServiceMaster’s agents and consultants are held to the same rules as ServiceMaster employees, officers and directors. ServiceMaster may be liable for a bribe made to a private party or government official by a third party on ServiceMaster’s behalf.

The consequences for violating anti-corruption laws are severe. They include fines to the individual who makes the payment, as well as ServiceMaster. Consequences may also include jail time for the individual making the bribe. ServiceMaster is prohibited from paying or reimbursing you for a fine imposed under anti-corruption laws. For further guidance, consult with your business unit legal representative or the Ethics Office.
Working with the Government

We Follow Procedures for Doing Business with Government Customers
ServiceMaster maintains valuable relationships with a variety of government customers. Government contracts are very complex and are subject to numerous policies, laws and regulations. When working on a government contract, you have a duty to know and comply with the exact contract requirements. Before bidding, negotiating or making any sales to a government entity, or deviating from contract specifications, you must obtain prior approval from the Legal Department.

Please note, violations of the government rules and regulations regarding contracts can result in substantial fines and even criminal prosecution for the individuals involved and ServiceMaster. It can also damage ServiceMaster’s ability to compete for government contracts in the future.

Responding to Governmental Requests and Investigations
ServiceMaster cooperates fully with any external investigation conducted by a governmental agency. If you are contacted by a government agency, contact your business unit legal representative or Ethics Office before responding to any request.

Insider Trading

We Never Trade on Inside Information
ServiceMaster employees, officers and directors, may occasionally be aware of material, nonpublic information about the company or other publicly traded companies with which we do business.

Examples of such information include:

- Development of a major new product or line of business
- Unannounced mergers or acquisitions
- Significant changes in senior management
- Pending or threatened material litigation
- Nonpublic financial results

This type of information is “inside information,” or information that’s not available to the public and would be valuable to an investor in deciding whether to purchase or sell a company’s securities (including shares of stock). Information is considered public only after it has been publicly disclosed and a reasonable amount of time has passed for the information to be absorbed by the marketplace. A “reasonable amount of time” is 48 hours or otherwise defined by our Insider Trading Policy.

Using inside information to decide whether to buy or sell a stock is known as “insider trading” and is illegal. It is also illegal to provide inside information to (or “tip”) others – including friends and family – so they may benefit financially.

Employees should read and be familiar with our Insider Trading Policy. If you have any question about whether the information you possess is material or nonpublic, do not trade on that information. Instead, seek guidance from your business unit legal representative. The consequences for violating insider trading laws are severe, and punishment may include fines and imprisonment, as well as termination of employment.
Competing Internationally

We Follow International Trade Laws

ServiceMaster has an international footprint. Accordingly, we absolutely must abide by the laws of international trade wherever it conducts business. These laws regulate exports from the country of origin, such as the United States and, in some cases, the transfer of “technology” within the country of origin when information is shared. Export regulations determine whether or not a product or technology may be exported or shared. This determination depends on the nature of the item, the country of its destination and the end use or end user. In some cases, the government bans all trade. In other instances, it requires an export license.

Keep in mind, exporting goods or sharing technology without the appropriate approvals may result in ServiceMaster losing its export privileges. It could also mean both civil and criminal penalties for the individuals involved. When you work on a matter where you believe international trade laws might apply, you should consult your business unit legal representative.
Customers, Suppliers and Third Parties

Our Focus on the Customer

Exceptional Customer Service

Customers select ServiceMaster because of our reputable brands and exceptional service. We strive to be the most customer-focused service company in every market. Treating customers with courtesy and respect and addressing concerns are core values at ServiceMaster.

Each employee contributes to the success of our company and it’s important to recognize the Winning Behaviors drive how we make decisions, take action and interact with customers and each other. We hold each other accountable for making the right choices and delivering on our promises to our customers, which keeps them coming back.

We will:

• Make sure customer inquiries and concerns are a top priority. We will view every contact with a customer as an opportunity to create a customer for life.
• Provide our customers with excellent value by doing the job right the first time, making sure every customer recognizes our commitment to top-quality service.
• Report any activity in which a customer has been treated unfairly or in violation of company policy, federal or state law.

We Promise What We Deliver. We Deliver What We Promise.

Our commitment to exceptional service means we deal fairly with our customers at all times. We do this by representing ServiceMaster honestly and accurately, with truthful sales and marketing practices. A lack of integrity in sales, marketing and advertising can lead to allegations of deceptive practices or consumer fraud – all of which impact our customers’ trust.

This means, in part, that we:

• Only draw accurate, truthful comparisons between our services and those of our competitors.
• Avoid misstatement of facts and misleading marketing, advertisements and promotions.
• Never misrepresent facts to gain a competitive edge in any market.

We Safeguard Third-Party Information from Improper Disclosure

Our customers trust us to protect their personal information. Such information includes our customers’ names, addresses, payment card information, Social Security numbers, government-issued identification numbers, driver’s license numbers, email addresses and insurance information.

Internally and externally, we share such information only in strict compliance with the terms of our privacy policies. Before you share customer data with a third party, consult the Legal Department to ensure you are in compliance with the applicable privacy policy.
Likewise, if you encounter our business partners’ or suppliers’ confidential information through the course of your work at ServiceMaster, you have a duty to safeguard this information from improper disclosure. To this end, we respect all contractual commitments, including non-disclosure agreements, which require us to protect third-party information.

We are equally committed to protecting the intellectual property (IP) of our business partners, customers and suppliers. IP refers to legally-protected creations of the mind and includes (but is not limited to) software, inventions, written materials and trademarks. We have a responsibility to use the IP belonging to others respectfully and only in accordance with our third-party agreements. This means, in part, we do not install unlicensed software on company computers. Additionally, those of us whose jobs have advertising, marketing or IT functions must use third-party materials appropriately. If you have any questions, consult the Legal Department.

**Protecting People, Property and the Environment**

Because our relationships with our customers are built on trust, ServiceMaster takes care to ensure the safety and quality of our products and services. Our products and services are designed to provide maximum benefit with minimal environmental, health and safety impact when used according to product label instructions and company policies. Your efforts in this regard are important for us to conduct our business responsibly and to protect people and the environment.

**Maintaining our customers’ trust requires that you:**

- Follow all applicable requirements regarding the proper use, storage and disposal of these products.
- Familiarize yourself with the material safety data sheets that apply to the products that you use.
- Follow the product’s label requirements. Remember, the label is the law.

**Hazardous Materials**

Our work may sometimes require the handling or disposal of materials classified as hazardous. Proper handling, transportation and disposal of hazardous materials are regulated by law. The penalties associated with non-compliance with these laws can be severe, including civil and/or criminal penalties. We have developed policies and procedures designed to ensure compliance with these laws and to help protect the health and safety of our employees and those around us.

Our policies and procedures are designed to ensure compliance with applicable federal, state and local regulations. You are responsible for understanding and following the policies and procedures that apply to your line of work. If you have any questions, ask your manager, supervisor or a designated technical expert.

Maintaining the trust of our customers also means we hold our suppliers accountable for the quality and safety of the products and services they provide to us. If you believe a supplier is not upholding these commitments, it is your responsibility to report the situation.

**Help us lock down our customers’ PII (personally identifiable information) such as:**

- Name and home address
- Social Security or Driver’s license number
- Insurance information
- Payment card information
- Government issued ID number
- Email address
Community

Fair Employment Practices

We Support Fair Employment Practices
We strive to be a positive presence in the communities where we work. We follow applicable labor laws and promote human rights wherever possible. This means that we do not knowingly engage with suppliers or other third parties who violate labor or human rights laws. See ServiceMaster’s Global Human Rights Policy for additional information.

The Environment

We Protect Our Environment
ServiceMaster is committed to minimizing the impact of our operations on the environment. We operate our locations consistent with applicable environmental and safety laws and regulations, as well as ServiceMaster policies and procedures. We show our utmost respect for the environment by working to minimize any environmental hazards. Our products and services are designed to provide maximum benefit with minimal environmental, health and safety impact when used according to product label instructions and company policies. We also work to conserve and protect natural resources and manage our energy usage.

Political Activities

We Engage in Ethical, Political and Charitable Activity
While we are encouraged to become actively involved in our communities, we must do so ethically. This means we do not engage in community, volunteer, political or charitable activities in connection with ServiceMaster’s name or using ServiceMaster’s resources, without the prior approval of the ServiceMaster General Counsel. You should not feel pressured or be led to believe your position at ServiceMaster (or chance of future advancement) is related in any way to your support of charitable or political causes.

All ServiceMaster employees are encouraged to volunteer personal time to support the candidates of their choice. Please note you should exercise good judgment in your participation in these types of activities and never make a personal political contribution for the purpose of obtaining or retaining business, or securing some commercial advantage on behalf of ServiceMaster. Company resources and the ServiceMaster name cannot be used for contributions to or involvement in political activities without permission from the ServiceMaster General Counsel.
QUESTIONS OR CONCERNS?

Call the Ethics Helpline 1-800-937-9888. This number can be reached 24 hours a day and translators are available. Make it your goal at all times to promote a positive, ethical workplace. If you are unsure of how to address an issue, seek guidance from your manager or another resource within ServiceMaster, such as our Ethics Helpline.