

# **Policy Creation and Distribution**

## **PURPOSE**

Cintas Corporation and its subsidiaries seek to conduct business in a lawful, ethical, and moral manner in all countries in which we have the privilege to work. To achieve this purpose, we expect our vendors to subscribe to certain moral and ethical principles in conducting business. These commitments are outlined in our Cintas Code of Conduct and Vendor Code of Conduct, which are publicly available and can be found at the links below.

https://www.cintas.com/pdf/cintas-coc-english.pdf

https://www.cintas.com/supplier-relationships/vendor-compliance/

In addition to our Codes of Conduct, Cintas has created a structured process for creating policies to provide guidance with respect to certain recurring situations, problems, or tasks that it encounters during the normal couse of business. This document highlights that process.

Cintas has established a policy and procedure system to:

- Help us train employee-partners who are new to our Company.
- Provide a consistent method of doing business throughout the company.
- Provide managers with decision-making ranges.
- Provide top management with control over the business.
- Combine the knowledge and experience of all managers to ensure that we use the "one best method" effectively to manage the task at hand.

A policy is intended to be followed in all cases and is Cintas's documented way of doing things. However, in cases where exceptions are necessary, a policy exception can be sought. Exceptions are reviewd and may be granted if appropriate approvals are obtained.

# SCOPE

Every Cintas partner may offer ideas for establishing a new policy or for revising an existing policy.

This process applies to all Cintas divisions and cost centers.

## **POSITION**

## **Creation of Policies**

The CEO approves all Corporate Polices and the appropriate officer or department manager supervises the creation and revision of operational policies and procedures. The Sr. Vice President, Secretary & General Counsel manages the process of creating, revising and distributing all polices on an annual basis.

Cintas' Policy Committee reviews proposed new Corporate policies and certain proposed revisions to existing Corporate policies. The Policy Committee is comprised of a select group of knowledgeable and experienced personnel within the Company who are appointed by the CEO to assist with maintaining an effective management style.

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Each member of Cintas' Policy Committee reviews proposed new Corporate policies and submits their comments to the Sr. Vice President, Secretary & General Counsel. If there is a material revision to an existing policy, the Sr. Vice President, Secretary & General Counsel will also involve the Cintas Policy COmitte for review and feedback.

- Upon receipt, the Sr. Vice President, Secretary & General Counsel forwards all Policy Committee feedback to the partner who proposed the policy.
- The policy initiator reviews the Policy Committee response and provides feedback to those Policy Committee Members who have requested it.
- After the policy initiator has incorporated all appropriate feedback into the proposed policy, he or she sends the updated policy to the Sr. Vice President, Secretary & General Counsel.
- The Sr. Vice President, Secretary & General Counsel reviews the updated policy and, if no charges are required, forwards it to the CEO for his final review and, if appropriate, approval.

Each policy is reviewed and, if necessary, revised on an annual basis by the officer responsible for that particular business unit or area of expertise.

### Communication of New Policies and Revisions to Existing Policies

New and revised Corporate policies are also announced via e-mail to all managers.

All management personnel are responsible for thoroughly studying new or revised policies and procedures. Managers are expected to explain the details of these policies and procedures to their teams so there is a clear understanding throughout the Company about how a particular situation is to be handled in the future.

#### **Access to Policies**

Upon approval, all Corporate policies are published on the Company Intranet Online Policy System.

Each operating division has access to the following:

- Corporate Policies, to which all Cintas partners are expected to abide.
- Operational Policies, which are pertinent to and applicable to a particular division or department.
- Operational Procedures, which may contain specific information about how a particular division or department is to function.

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