



The Aaron's Company, Inc.

Gifts & Entertainment Policy

THE AARON'S COMPANY, INC.
GIFTS & ENTERTAINMENT POLICY

1.0 PURPOSE/OBJECTIVE

The purpose of this Gifts & Entertainment Policy ("Policy") is to ensure that The Aaron's Company, Inc. and its subsidiaries (collectively, the "Company" or "Aaron's") are able to establish and maintain goodwill with its external business partners while avoiding the appearance of impropriety. The exchange of gifts and entertainment can build goodwill in business relationships, but some gifts and entertainment can create improper influence (or the appearance of improper influence). Some can even be seen as Bribes (as defined in this Policy) that tarnish Aaron's reputation for fair dealing or break the law.

2.0 SCOPE

This Policy applies to all employees of the Company.

3.0 POLICY STATEMENT

The Company recognizes that reasonable gifts exchanged with Company's clients, service providers, and vendors can help build stronger relationships and reflect common social and business customs. There is nothing wrong with establishing good will and creating sound working relationships by giving gifts, but regardless to how well intentioned the practice of offering and accepting gifts, those activities must follow Aaron's Policy to avoid the appearance of impropriety, conflicts of interest, or persuading anyone to act dishonestly or illegally.

4.0 POLICY

4.1 Gifts

4.1.1 Gifts, Generally

Gifts may be offered, given, provided, or accepted by a Team Member, or family member, if they meet each of the following conditions:

- Are not a cash gift or equivalent (i.e.: gift cards);
- Are not solicited;
- Do not exceed \$500 of fair market value in any 12-month period to or from any one current or potential customer, vendor, individual, organization or service provider;

- Are not tied to action or inaction on the part of the recipient or can otherwise be construed as a Bribe, kickback or payoff;
- Are customary and would not cause embarrassment to the Team Member or the Company if publicly disclosed;
- Do not violate any laws or regulations; and
- Are approved by an appropriate Supervisor.

By way of example only, acceptable gifts include those that are in furtherance of business, and are both ordinary and customary in the relevant industry or region. Unacceptable gifts include those that are extraordinary or unreasonable.

4.1.2 Gifts in Excess of \$500

If a gift or combination of gifts is received from any one current or potential customer, vendor, individual, organization, or service provider in excess of \$500 in any 12-month period, then the gift must be reported in writing to the General Counsel. Exceptions to the \$500 limit per 12-month period may be permitted with prior written approval. Such exceptions will be considered on a case-by-case basis.

4.1.3 Team Member Gifts

Section 4.1 does not apply to exchanging Gifts between Team Members as tokens of appreciation or recognition. However, Gifts exchanged between Team Members should not be extraordinary or unreasonable. Exchanging Gifts between Team Members is also subject to any limitations or restrictions set forth in any applicable Team Member Handbook or Policy Manual.

4.2 Meals & Entertainment

4.2.1 Entertainment, Generally

Providing and accepting meals and entertainment must meet the following criteria:

- Are not solicited;
- Are not tied to action or inaction on the part of the recipient or cannot otherwise be construed as a Bribe, kickback or payoff;
- Are customary and would not cause embarrassment to the Team Members or the Company if publicly disclosed; and
- Do not violate any laws or regulations

Team Members may attend business lunches, dinners, and similar outings (sporting events, golf outings, theater, shows, etc.), when invited, if those outings conform to the criteria listed above.

By way of example only, acceptable entertainment includes those that are in furtherance of business, and are both ordinary and customary in the relevant industry or region. Unacceptable entertainment opportunities include those that are extraordinary or unreasonable.

4.2.2 Significant Events

Team Members may also have opportunities to attend significant sporting or other Entertainment opportunities (“Significant Events”). For such opportunities, in addition to the requirements of Section 4.1.1, the Team Member must obtain approval from the department or division vice president that:

- Attending the event furthers the business relationship; and
- Attending the event will not improperly influence decisions about Aaron’s business.

Team Members should also disclose accepted invitations to Significant Events to the Vice President of Compliance.

By way of example only, Significant Events include post-season sporting events, major golf tournaments, and unique or rare entertainment opportunities.

4.3 Vendor Sponsored Trips

Vendor sponsored trips require greater scrutiny and must be approved in advance by the General Counsel.

4.4 Use of Company Funds & Expense Reports

Gift- and entertainment-related expenses must be accurately reported and include the necessary receipts or other appropriate substantiating documentation.

All reports and substantiating documents must be submitted timely. In addition, Team Members must be honest and accurate when submitting expense claims for reimbursement. Team Members are not permitted to use Company funds for personal travel, gifts, entertainment, or to supplement a Team Member’s income.

Pursuant to the Company's Expense Report Policy, failure to provide accurate and necessary expense reports, receipts, or substantiating documents in a timely manner may result in the Company not reimbursing expenses. Further, to the extent a Team Member receives an excess reimbursement, the Team Member must promptly report and return to the Company any excess reimbursements.

4.5 Anti-Bribery & Anti-Corruption

The Company does not tolerate bribery or corruption, irrespective of where we are located or where we do business. Regardless of local practices or competitive intensity, Team Members must avoid even the appearance of bribery or corruption when dealing with any vendor, customer, or public official. Team Members must never offer, give, or authorize a payment or anything of value to influence a business decision. Under certain circumstances, even a charitable contribution could be considered a Bribe.

4.6 International Travel and Customs

Where Team Members are traveling outside the United States and Canada, they should act in accordance with the appropriate gift and entertainment customs and laws for the location that they are visiting, to the extent such custom does not conflict with this Policy. If complying with this Policy presents any issue or conflict with local law or custom, then Team Members should discuss them with Human Resources or Legal. It is each Team Member's duty to ensure that, where an issue or conflict arises, they actively seek to get it resolved as soon as possible.

5.0 DEFINITIONS

5.1 Gift

A Gift is any item of monetary value presented to an Aaron's Team Member by a non-Aaron's Team Member or any item of monetary value presented to a non-Aaron's Team Member by an Aaron's Team Member.

5.2 Entertainment

Entertainment (including, but not limited to, beverages, recreation, lodging, transportation and tickets) is an event with a specific business purpose. Entertainment must include the presence of an Aaron's Team Member. Aaron's does not consider entertainment of a non-Aaron's Team Member as a gift, as long as both an Aaron's Team Member and a non-Aaron's Team Member are present during the event.

5.3 Bribery or Bribe

Bribery means giving, offering, or promising anything of value to a public official with the intent to inappropriately influence the official to do, or not do, an official act.

6.0 COMPLIANCE AND REPORTING

The Policy Owner is responsible for the implementation and application of this Policy. Interpretations of this Policy are made by the Compliance Department, in consultation with the Legal Department. Action may be taken to remedy Policy violations, including disciplinary action up to and including termination of employment where appropriate.

7.0 REVIEW CYCLE

This policy is reviewed no less frequently than 2 years following its initial adoption or most recent revision.

Policy Owner:	Vice President of Compliance
Policy Category:	Compliance
Authorized By:	General Counsel
Title:	Gifts & Entertainment Policy
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