



### **Table of Contents**

- Section 1 Introduction
- Section 2 Fair Treatment of Employees
- Section 3 How we Conduct our Business
- Section 4 Financial Integrity & Protecting our Assets



### A Letter from the Leadership Team

At Regis, we believe strongly that every employee, no matter their role or title, contributes to the success of Regis and our individual brands. We are all stewards of our Company and we each share a duty of loyalty to our customers, our shareholders, our franchisees and our fellow employees.

Every day at Regis we strive to build a business we can all be honored to be a part of and one that delivers on the promises we make to provide outstanding service to our customers and franchisees along with superior financial results to our shareholders.

As we continue to build a high-performing business we remain committed to doing the "right thing" every day and in every area of our business. The Code of Business Conduct and Ethics establishes how we do business and defines our relationships with fellow employees, customers, franchisees, competitors, suppliers, communities, and shareholders. The Code is important to ensure that each one of us understands how to play by the rules while playing to win. These principles help define who we are as an organization, and we encourage you to carefully consider this document as you will be held to these standards.

Words and actions matter and all of us at Regis are responsible for understanding and complying with our Code. If we do that every day, we will all help to build a successful business for which we can all be proud.

Thank you for your ongoing commitment to uphold our Values and the highest ethical standards.

#### **Regis' Executive Team**



## Regis Values

Our values are the building blocks for our purpose statement: We exist to unleash the beauty of potential.

They bring our purpose to life and help to create a working environment we all want to be a part of.



# FOSTER TRUST

#### Create powerful relationships by acting with empathy and integrity.

- · Do the right thing regardless of the consequences
- · Listen and be mindful of diverse perspectives
- Find ways to show you care and have each other's back
- · Authentically lives and champions our values



#### Dream big and courageously challenge the status quo.

- · Bring disruptive ideas and plans
- · Test and learn now, don't wait for perfect later
- · Push yourself and those around you to grow
- · Be the first to ask for help or say you don't know



#### You are empowered. Take responsibility and own your role and your results.

- · Know what the win looks like
- · Take initiative and act with urgency
- · Own, correct and learn from mistakes
- Ability to assess, react and adapt to changing circumstances



### Connect and collaborate with all your partners. Share the challenges as much as you celebrate the wins.

- · Titles are irrelevant team is everything
- · Always assume positive intent
- · Serve your community with passion
- · Show appreciation and have fun doing it

## Our Responsibilities

#### To Our Franchisees

Our Franchisees are key to our success. We share a common vision of providing the best salon experience for our customers. Great franchisees, who operate great salons, enhance our brand value. We are committed to maintaining mutually supportive relationships with the best franchise operators in the business to help them be successful.

#### To Our Shareholders

We recognize success is measured by a sustainable increase in shareholder value. We remain committed to achieving that goal through serving our four key stakeholders: our customers, our employees, our franchise partners and our shareholders. When we adhere to this Code, these four key stakeholders benefit and, in turn, we increase shareholder value.

#### **To Our Customers**

We value our customers and our relationships with them. We know we are only as good as the services we provide. We are committed to providing an outstanding customer experience by providing high quality, affordable services in an inviting salon atmosphere. We treat our customers as we would want to be treated.

#### To Our Employees

We know our employees are critical to our success. We are committed to providing a positive, productive, safe environment free from harassment and discrimination where everyone is treated with dignity and respect. We value courage, each other, thriving together and accountability.

## Living the Code

We expect all our employees and Board members to know and follow the Code and review it annually. While it is specifically written for our employees and Board, we expect our franchisees, vendors, suppliers, contractors, consultants and anyone else who may work with us to follow the Code and its principles as applicable to their relationship with Regis

#### **Every Employees Responsibility:**

- Act as a role model, demonstrating ethical behavior and conducting yourself in a way that reflects our Values.
- Know the Code of Business Conduct and Ethics and review it annually.
- If you think there is a violation of the Code, or if you think an activity or behavior could lead to a violation, you have a duty to say something!

#### **Every Managers Responsibility:**

- Make fair and objective business-based decisions.
- Help others understand the Code and Regis policies and live the Code every day.
- Create an environment where everyone is comfortable speaking up without fear of retaliation, their input is welcome, advice is freely given, and issues are surfaced early.
- Take seriously any concern raised that compromises our Code and escalate the matter promptly.
- Encourage self-reporting of Code violations, and partner with Human Resources if you need to take corrective or preventive action.
- Fully support any investigation.
- Appreciate and recognize ethical behavior.

#### **Reporting Violations:**

You can report violations to your supervisor(s), Human Resources or to the Ethics Hotline at 888-760-3141 which is staffed by a live operator from an outside company 24 hours a day, 7 days a week. Whether you choose to report anonymously or not, please provide as many details as possible so we can address the issue thoroughly and promptly. We all have a responsibility to cooperate in an investigation and report information truthfully. Regis does not tolerate retaliation against anyone who assists with an investigation or raises a good-faith concern under our Code.





### The Golden Rule

#### What It Means, Why It Matters And How We Do It

We live by the Golden Rule: "Treat others as you want to be treated." This means treating your customers, franchisees and colleagues the way you want to be treated. Our employees are the differentiators in the workplace. They set us apart from our competitors and define who we are. We value the contributions of everyone and foster collaboration because together we can achieve more.

#### **Equal Opportunity**

Regis employees represent a wide range of backgrounds. Regis is committed to providing equal opportunities; we do not make employment-related, franchise-related decisions or discriminate against anyone based on personal characteristics such as race, color, gender, sexual orientation or identity, religion, age, national origin, disability or any other classification protected by law. We make the same commitment to our customers: If our salon offers a service, the service must be available to all customers; we do not discriminate against anyone in any way.

#### **Wage And Hour Rules**

Regis complies with all applicable laws and regulations related to wage and hour issues, including meal and rest breaks, leave, overtime pay, termination of employment pay, minimum wage requirements and fair and just practices relating to salary and wages. We expect all employees to truthfully track and log their time in accordance with these requirements. Report any violations related to compensation and working hours or other basic conditions of employment to Human Resources or call 855-MyRegis.

#### **Open Communication**

The best ideas and solutions most often come from those who don't manage the work, but instead from those who do the work. We know and value this principle and Regis is committed to creating a work environment of open, honest communication. We are a place where everyone's ideas and voices are heard and respected, where issues are promptly raised and resolved and where everyone is active in bringing our values to life. We strive to be transparent in our communications. We want you to understand the direction of the business and how your day-to-day work helps Regis, and its franchisees achieve success and welcome suggestions on how to do things better. If you have questions, suggestions, ideas or solutions, we encourage you to talk to any of your leaders, from your immediate supervisor to our CEO.

#### **Diversity And Inclusion**

We strive to foster an environment of respect, inclusiveness, humanity and humility. As such, we value the contributions of everyone. We embrace and believe that you should bring your whole self to work. This diversity of opinions, beliefs and cultures enriches and strengthens our Company and brands.

### **Harassment & Non-Retaliation**

#### Harassment

Regis is committed to a safe, congenial workplace, and does not tolerate any form of harassment.

Harassment includes sexual harassment, unwelcome conduct, threats or bullying, name-calling, negative stereotyping, unwelcome physical contact, offensive gestures or damaging the physical property of others. This includes but is not limited to vendors, co-workers, customers, contractors, landlords, franchisees or any other non-associate who conducts business with Regis.

To keep our workplace positive and productive, we must stop any incident of harassment or discrimination as quickly as possible. Each of us is expected to report violations or suspected violations to our manager, Human Resources or to call 855-MyRegis. We value confidentiality; however, we have an obligation to follow up on all reported harassment issues within the workplace. We will protect the reporting party of any good-faith reports from retaliation.

#### Non-Retaliation

Regis is committed to creating an environment of non-retaliation. We should all feel comfortable speaking up, raising concerns and asking questions. You can always make a good-faith report of any suspected violation of our Code, a Company policy or the law without fear of any negative impact

Anyone who retaliates against a person for making a report or participating in an investigation in good faith may be disciplined, which could include termination.

Q: I overheard a conversation between my co-worker and one of her customers. During the conversation, they talked about being at a bar and what they had done to another person. I was so offended. How should I handle this?

A: You should talk with your salon manager right away. Even if you don't know the people involved, speaking badly about someone to a customer is never acceptable.

Q: I work at Salon Support. During a staff meeting, one of the other managers called me old. They said they were kidding but I felt embarrassed. What should I do?

A: Each of us has a different definition for what is disrespectful, so any kind of name calling, even in a joking fashion, is not okay. If you can speak with your immediate manager, always seek them out first. If not, go to another manager or HR for help.

Q: At lunch, one of my coworkers was sharing inappropriate material from his cell phone. While many ignored this employee, I was offended. Should I report this behavior to my supervisor?

A: Absolutely! Even though it might be lunch or break, every Regis employee is entitled to a workplace free from illegal harassment.

## Providing a Safe & Healthy Workplace

#### **Workplace Safety & Security**

Regis is committed to providing a safe and healthy workplace for employees, business partners, customers, visitors, franchisees and vendors working within, or visiting our facilities and premises. We must all do our part to promote our own safety and security and that of our customers. This includes following safety protocols with hazardous materials, keeping walkways clear and complying with other safety policies.

Additionally, at Salon Support, this includes always wearing Regis ID badges while in the buildings and not allowing unscheduled visitors to enter the building at anytime. Any unsafe area or area of concern should be reported the Human Resources department or to call 1-855-MyRegis.

#### **Substance Abuse & Weapons**

The possession, solicitation or use of alcohol, illegal drugs, or being under the influence of such substances while at work, is prohibited. We must each ensure our performance and judgement are sound during working hours.

We must also comply with Regis' **Dangerous Weapons Policy** and report suspicious packages or events to law enforcement.

### Q: Is it okay to give my password to my co-worker to update my calendar and move meetings?

A: Associates should never give passwords, badges or other items to anyone for any use. This puts everyone at risk. You should always log in to your own computer and never share passwords. If your job requires time sensitive approvals, make sure you delegate the task to someone else before you leave. Contact the IT Helpline if you need assistance by calling 1-855-MyRegis.

## Q: I work at Salon Support. One of my co-workers forgot her badge and asked if she could get let into the same floor as me. Can I let her in?

A: Sorry, no. Your co-worker must get a badge from the 5th floor Security Desk.

### Q: I am taking a prescription pain killer, is this okay to use while I am working?

A: Pain killers prescribed for your own personal use and used in accordance with a medical professional's direction are not an illegal substance. However, if there are warnings prohibiting you from engaging in certain work activities (such as not driving), you must abide by them.



### Corruption/Anti-corruption And Anti-bribery Laws

#### What It Means, Why It Matters, How We Do It

Regis conducts business throughout the United States, Canada and internationally. We have a responsibility to follow all laws and regulations that apply to our business. Non-compliance puts our business in jeopardy and could result in civil and criminal fines, penalties and other disciplinary actions.

#### Corruption/Anti-corruption And Anti-bribery Laws

As a part of our commitment to conduct our business with integrity, Regis does not tolerate the use of unethical practices of any kind in business, including bribery or kickbacks, e.g., cash, gifts, travel, excessive meals or entertainment, offers of employment and charitable or political contributions. We follow all anti-corruption laws and regulations wherever we do business. In other words, we never try to create an unfair advantage in obtaining or retaining business. Any third party who conducts business on our behalf must also comply with these requirements.

Anti-corruption laws commonly focus on interactions with the government. We must be truthful and straightforward in our dealings with the government and comply with valid governmental requests and processes. Payments made to any foreign agent or government official must be lawful under the laws of the United States and the foreign country. It is against Regis' policy to offer or make a payment or gift of any kind to facilitate a local process or to influence a local government official.

### **Conflicts Of Interest**

#### **Conflicts Of Interest**

Conflicts of interest are situations where an opportunity for your personal gain is at odds with the best interests of Regis. Even if it's not intentional, the appearance of a conflict may be just as damaging to your (and Regis') reputation as an actual conflict. We have a responsibility to all our stakeholders to avoid these conflicts and make decisions strictly based on Regis' interests, without regard to personal gain. If a conflict of interest presents itself, you could be tempted to act in a way that goes against what would be best for our Company.

We are each required to disclose any potential conflicts of interest to our immediate manager, or by contacting HR. Keep in mind, simply having a conflict of interest is not necessarily a violation of this Code.

However, failing to disclose a conflict or apparent conflict can be. The Board of Directors is ultimately responsible for determining whether any transaction or relationship constitutes a conflict of interest and has the authority to waive any conflict of interest.

#### There is a likely conflict of interest if you:

- Start your own business or work for a business that competes directly or indirectly with Regis
- Advance the interests of others with whom you have a personal or business relationship at the expense of Regis
- Have a member of your immediate family or household that has a financial interest in Regis' vendors, a franchise operation or competitor of Regis
- Hire, supervise or report to a family member or someone with whom you have a romantic relationship;
- Engage in other activities that compete with, or appear to compete with, Regis while still employed by Regis
- Have a board seat with a Regis competitor or business partner where your judgment could appear to be influenced in a way that harms our organization.

## **Exchanging Gifts & Entertainment**

#### Giving and Accepting Gifts and Entertainment

Exchanging gifts, entertainment or spending time outside of work could cause a conflict of interest, or the appearance of a conflict. Neither you nor your relatives may give gifts to, or receive gifts from, Regis' vendors or Franchisees, excluding minor holiday gifts or business meals less than \$50 in value that are not meant to be a bribe. In no event should you put Regis or yourself in a position that would be embarrassing if the gift were made public.

Additionally, we should not accept or solicit any personal benefit from a vendor, or potential vendor that might compromise, or appear to compromise, their objective assessment of the vendor's products, prices or services.

You may attend or participate in vendor-sponsored or Franchisesponsored events that allow Regis to maintain an important business relationship. We must always remember to act in a way that promotes Regis' best interests and that protects our reputation.

### Q: My brother is a handyman. There are several things broken in the salon I know he could fix. Can I hire him?

A: Although this may be a legitimate business need, it would create the appearance of a conflict of interest. Before talking with your brother, contact your manager or CFM (Central Facilities Management) so that an independent review can be done before anyone is hired. This will help protect you, your brother and Regis if the relationship were ever to come into question.

#### Q: May I accept a special discount from a supplier?

A: If the discount is not available to other Regis employees, then you shouldn't accept the discount because doing so could create a conflict of interest or the appearance of one.

Q: I'm a stylist working for Regis. My friend owns a small independent salon and wants me to work there a few hours a week when the salon is especially busy. Can I work there part-time if it doesn't conflict with the hours, I'm scheduled to work for the Regis owned salon?

A: No, you cannot work at any business that competes with Regis, such as another salon, even if it's only part- time and doesn't conflict with your hours at the Regis owned salon.

#### Q: A vendor or Franchisee wants to take me to lunch. May I accept?

A: Modest (less than \$50 in value) and infrequent business meals may be accepted. However, whenever a vendor or Franchisee pays for a meal, always consider the specific circumstances. You want to make sure the meal doesn't impact your judgment or appear to others as impacting your judgment when deciding whether to send the vendor future business.

## **Fair Competition**

## ANTITRUST AND COMPETITION LAWS

POLITICAL ACTIVITIES AND CONTRIBUTIONS OF COMPANY FUNDS TO POLITICAL PARTIES AND CAMPAIGNS

FAIR PURCHASING

COMPETING FAIRLY

SOCIAL MEDIA

Our ethical responsibilities to our competitors also include legal obligations that ensure fair competition. Competition (or antitrust) laws are designed to promote open and fair competition and protect customers from unfair business practices by prohibiting any agreement or act that unreasonably restricts trade or fixes prices. Any violation of these laws may lead to civil and/or criminal penalties for the individuals involved as well as for Regis.

We encourage everyone to vote and be active in the political process. Participation is voluntary, on your own time, unless local laws state otherwise, and at your own expense. We are not allowed to directly, or indirectly, use or contribute Regis funds or assets to any political party, candidate or campaign. This includes use of Regis' facilities, office equipment, supplies, inventory and work time.

We purchase a wide variety of goods and services. When making these purchases, we must act fairly and impartially toward vendors, suppliers and other service providers. See the Conflicts of Interest section of the Code for further guidance on accepting gifts and entertainment from vendors, suppliers and service providers.

We are committed to upholding our Values by treating our competitors fairly. Gathering information about others to compete effectively in the marketplace must be done lawfully and ethically. You should never encourage someone to give you information that they should be keeping confidential.

At Regis, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities.

Only use social media for Regis' business purposes if the Company has expressly authorized you to do so. When you use social media personally, do not disclose any confidential information that you learn because of your position at Regis. Please also be sure to communicate respectfully and be mindful of the public nature of social media. Your interactions on social media can influence others' opinions of you and of Regis, which could impact your business relationships. When you are communicating with or about Regis co-workers, customers, vendors or any others with whom Regis has a relationship, please keep in mind that our Social Media policy and this Code apply. If you have guestions, ask your leader.

Q: I learned that the salon is having a sale on Designline products next month. Can I tell my Facebook friends?

A: You can tell your Facebook friends once the sale has launched.

Q: I love promoting our salon! Can I create a Facebook page, Twitter or Instagram account for it?

A: Your salon should have a Facebook page owned by Regis and we encourage you to use it! Under Regis's Social Media Policy that's the only account Regis authorizes you to use. As a result, you may not create any other page or account representing a Regis- owned salon.

### **Upholding Regis' Reputation**

#### **Media Inquiries**

Regis' reputation is critical to our success. To help ensure that we provide consistent and accurate information, Regis has designated individuals to speak on its behalf. If you receive media inquiries from reporters or editors requesting Regis' comment or position, please refer them to the email address <a href="MediaRelations@Regiscorp.com">MediaRelations@Regiscorp.com</a>

#### Volunteering

Associates are free to support community, charitable and political organizations, as well as causes of our choice, if we make it clear that our views and activities are our own and not representative of Regis.

Our outside activities must not interfere with job performance. And we should never pressure others to express views or to contribute to, or support political, religious or charitable causes that may be contrary to their personal beliefs.

#### **Contribution to our Communities**

We are committed to supporting our salons' local communities, making them stronger and ensuring we are involved in their success. We can be a force for positive action – bringing together our partners, customers and the community to contribute every day. Our business is only as strong as the communities in which we all live and work.

However, any contributions made with Regis funds or on behalf of Regis must be approved by your VP.

#### **Fundraising**

Because local, state, provincial and federal laws highly regulate fundraising opportunities, including raffles and bake sales, please get permission prior to conducting the event. Please contact <a href="https://example.com/html/>HRDept@Regiscorp.com">HRDept@Regiscorp.com</a>.

#### **Solicitation**

Regis is committed to keeping our workplace free of solicitation for goods or services that we do not sell or provide. During work time, do not solicit coworkers or customers for contributions, subscriptions, memberships or the sale of goods or services that Regis does not provide. People not employed by Regis may not solicit anyone or distribute literature, pamphlets, printed or graphic material of any kind.

#### Q: One of our long-term customers is struggling to pay her medical bills. Can we do a fundraiser for her?

A: Unfortunately, fundraising is highly regulated by the government and doing so puts yourself and Regis at risk. Please contact HR with questions.



## **Financial Integrity**

#### What it Means, Why it Matters and How we do it

Financial integrity is critical to maintaining the trust and confidence we've built with shareholders, regulatory bodies, customers, employees and other stakeholders. Regis is publicly traded; therefore, we have a legal responsibility to keep complete, accurate, and understandable financial and operational records that fairly represent the condition and results of the Company.

Many controls are in place to protect and preserve our financial integrity. We are all, regardless of title or job, responsible for following policies and procedures that involve the reporting of results, and the use of Regis property.

#### **Accuracy of Regis Records**

All financial books, records and accounts must accurately reflect transactions and events. Inaccurate financial reporting could undermine shareholder confidence, impact our reputation and subject Regis to fines and penalties.

If you are asked to falsify a financial record or become aware of any fraud or matters involving accounting, internal accounting controls or auditing issues, you should report the issue immediately to your manager or call the Regis Ethics Hotline at 888-760-3141, which is staffed by a live operator from an outside company 24 hours a day, 7 days a week, 365 days a year. Calls are free, confidential and may be made anonymously. Your calls and reports will be protected from retaliation.

#### Here are a few rules to keep in mind:

- Follow Regis' policies and procedures when negotiating contracts and making commitments on Regis' behalf. See Regis'
   Authorities Guidelines
- Properly support, review, approve and record all payments as required when spending money on Regis' behalf.
- When submitting business expenses, follow <u>Regis' Business Travel and Entertainment</u> <u>Policy.</u>
- Record sales generated from our customers, affiliates and Franchisees in a timely manner.
- Represent the true nature of all transactions (liabilities, funds and assets) accurately and completely in our financial records.
- Handle all documents in accordance with Regis' <u>Records and Information</u> <u>Management Policy.</u>
- Don't exceed your authority to act on Regis' behalf.

## Use and Protection of Regis Assets

We are responsible for properly using and protecting Regis assets of any form, including:

- Cash
- Merchandise inventory
- Technology items (such as computers and mobile devices)
- Regis information (including strategies, business plans and upcoming promotions)
- Anything you create for Regis

Our assets should only be used for legal, appropriate business reasons. We should have no expectation of privacy regarding our Company owned computers, mobile devices, email accounts or other technology.

Use of Regis' electronic communications systems must conform to our IT Security Acceptable Use Standards.

- Only Company approved services should be used for cloud storage
- Set up strong passwords and never share them when working with Regis information or technology tools (including laptops, email, databases, etc.)
- Follow all policies and license agreements
   If you have any questions on passwords, storing Regis information or other IT security protocols, please contact the Helpline.

Q: I told a friend who is a stylist and works on her own about our internal training and education videos. She would like to see them, and I think I could get her to come work for Regis if she saw what cool things we're doing. Can I share them with her?

A: Only when she becomes a Regis employee. Encourage her to come work for us and then we'll share the videos with her. Regis has invested in this top-notch education program, and it is an asset of Regis. It is for the benefit of our stylists, not our competitors.

Q: My salon is closing, and we have a bunch of products. Can I take the products home and sell them on eBay or Craigslist?

A: No. The product is a Company asset and must be returned.

### Retention of Business Records

Retention of business records (records management) is the creation, retention and discarding of records. Business records, regardless of their media format (paper, electronic, audio/video, etc.) are documents created or received in the course of your work at Regis. Examples include but are not limited to:

- Email
- Salon close-out book (including bank deposit slips, receipts, etc.)
- Memorandums
- Meeting minutes
- Contracts
- Accounting documents

Regis' Records and Information Management Policy defines our standards for the management of records. We must all follow those standards, including, but not limited to:

- Decide whether it is necessary to create a record (such as an email).
- Be factual; do not make assumptions and avoid misleading statements.
- Only create a document for which you would be prepared to take responsibility.
- Be mindful of the recipients of a record. Do not share a record with recipients if there is no need for them to have access to it.
- Do not use private email accounts to send company emails and do not save company documents on private servers. Our policy requires records be destroyed after a certain amount of time. Refer to the policy and only keep records until their end date, unless you have been instructed by the Legal Department not to destroy them.

## **Intellectual Property**

Regis values our brands, and we are responsible for securing and protecting the intellectual property that supports our brands and our customers' brand experience. Intellectual property includes:

- Trademarks and trademark registrations (Designline®, Supercuts®, etc.)
- Copyrights (creative works designed by Regis employees or contractors, software, photos, etc.)

We must also comply with the laws governing copyright, fair use of copyrighted material, trademarks and other intellectual property whether owned by Regis or others. This may include the rights to things such as music, logos, videos, designs and even a person's name. Franchisees must also comply.

We are all responsible for obtaining any necessary permission required by a third party before using that party's intellectual property this includes taking a customer's photo that includes their face and posting it to Facebook.

## Q: My backroom is filling up, and I think it's time to do some spring cleaning. I have boxes of close-out books, audit checklists and old employee records. What should I do with this stuff?

A: Associate records should always be sent to Salon Support and, if they contain confidential information like social security numbers and medical information, make sure it gets there in a method that can be tracked (e.g. UPS, FedEx or registered mail). For the rest of the documents, look at the Records and information Management Policy and, before you throw away any documents, make sure you keep them for the required length of time and that you are not on a litigation hold (check with your supervisors or the Legal Department if you're not sure!)

## Q: I love showing off my work and my customers love the work I do. They let me take their pictures. Can I post them on Regis' or my Instagram / Facebook / Snapchat accounts?

A: Only if nothing in the picture identifies them (for example, a picture that only shows the back of the head and doesn't show the customer's face). Otherwise, you may be violating their privacy rights and other laws, exposing you and Regis to lawsuits, so don't do it!

#### Q: I just downloaded Beyonce's new release – can I play it in the salon?

A: Unfortunately, no. You can't use music that is bought for personal use to benefit the business, or we would be infringing on Beyonce's copyright. The radio is the only approved way of playing music in the salon.

### Q: There is a great picture I found on the internet that I'd love to use in the next Franchisee training meeting. Can I?

A: Maybe. Check with Legal to make sure we have the proper license.

## **Protecting Confidential Information**

Customers, franchisees and employees trust Regis with their personal information. We should always take precautions to protect the personal information of our customers, franchisees and employees as well as the confidential business information our franchisees and our organization. Examples of confidential and proprietary information include, but are not limited to:

- Unreported financial data, sales results and trends
- Agreement terms and conditions, rates or prices received from suppliers
- Franchise Agreement and sublease details
- Marketing and business plans
- Research, development, processes and methods
- Customer and supplier information
- Confidential customer, franchisee and employee information such as personnel records, social security numbers, medical information, home addresses, bank account/ACH details, etc.

We should avoid talking about or sharing information about these things in public places. We must also take reasonable steps to prevent accidental disclosure by limiting access to documents, properly securing and disposing of them. If you hear about or suspect any data breach incidents, or believe someone is taking intellectual property, or disclosing or accessing confidential information in violation of the Code, call 855-MyRegis immediately.

# Q: My family and friends often ask me about how Regis' sales are and how Regis is doing as a company. What can I tell them?

A: You can tell them what has been made public in our quarterly earnings reports. Because Regis is a publicly traded company, you cannot share information that Regis has not shared with the public – like daily, weekly or monthly sales, buying or selling other businesses, and/or upcoming marketing or business strategies. If you do, and your friends or relatives buy or sell Regis stock based on this information, both you and they could violate securities laws.

## Q: A vendor would like me to provide a Franchisees ACH information and home address. Can I tell them?

A: No. This information is private and confidential and cannot be released without written permission from the Franchisee.

### Compliance with Securities Laws and Insider Trading

By law, we are required to publicly disclose certain important information about Regis at designated intervals, such as sales, earnings, regulatory matters and other material events. When we publicly disclose this information, it is our responsibility to do so fairly, completely, accurately, timely and understandably.

You may find out important information about Regis before it is released to the public and we have a responsibility to keep non-public information confidential. We must be cautious in our communications and trading of Regis stock to avoid even the appearance of insider trading.

Insider trading is buying or selling securities (such as Regis stock) while aware of material, non-public information, acquired through a relationship of trust or confidence, with intent of personal gain. Material information is information that a reasonable investor would consider significant to an investment decision. Examples include same-store sales results, financial projections, news about pending transactions or material relationships (such as Walmart, vendors or landlords). Information is non-public unless it has been effectively disseminated to the public and enough time has elapsed to permit the investment market to absorb the information (and reflect it in the stock price). Please refer to our <u>Insider Trading Policy</u> for more information.

### **Contact Information**

- Ethics Hotline: 1-888-760-3141
- Human Resources: 1-855-MyRegis (1-855-697-3447) or <u>HRDept@Regiscorp.com</u>
- Media Relations: <u>MediaRelations@Regiscorp.com</u>
- **IT Helpline**: 1-855-MyRegis (1-855-697-3447)