

Aaron's, Inc.

Code of Conduct



Aaron's®



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Message from Our CEO and CCOs

Since 1955, Aaron's, Inc. (the "Company") has been committed to engaging in ethical business practices, providing quality products, and focusing on uncompromised service to our customers. Serving our customers the right way is critically important to successfully grow the business. Achieving results, the right way, both legally and ethically is equally as important. This is vital as we continue to build for the future and work hard to make Aaron's, Inc. a great company for our customers and our associates.

Acting in a compliant manner, both ethically and legally, is a critical requirement for the long-term success of the Company. Compliance, however, goes beyond completing your training on time - it requires making good decisions, identifying risks that may adversely affect the business, and asking questions if unsure about the path forward. Specifically, we must comply with applicable laws and Company policies, safeguard Company assets, treat each other with respect and dignity, honor our commitments, and take responsibility for our actions.

This Code of Conduct (the "Code") outlines our key business practices and ethical principles, including policies and procedures which provide guidance on making the right decisions in our day-to-day activities that all associates, officers, and directors must understand and follow. The Code of Conduct is not meant to be all encompassing and does not cover every issue that may arise, but instead sets our Company expectations. All Company associates must strive to avoid even the appearance of improper behavior.

If you are in a situation that you believe may violate or lead to a violation of the Code of Conduct, or if you become aware of actual or suspected violations, you must report it to any one of the resources provided to you including the Aarons-Cares Hotline available 24 hours a day/7 days a week at 1-866-453-5144 or complete the web form via any computer or mobile device at www.aarons-cares.ethicspoint.com. When you submit a report, you may choose to remain anonymous or provide your name and contact information if you wish. We will not tolerate retaliation against anyone if actual or suspected illegal or unethical conduct is reported in good faith.

We are confident about the direction the Company is heading and about our commitment to always act in a legal and ethical manner, make the right decisions, ask for help if unsure, and walk away from a business opportunity if it cannot be done in the right way for ourselves and our customers.

Thank you for your dedication and support in making Aaron's, Inc. an ethical leader in our industry and the communities we serve.

John Robinson – President and CEO of Aaron's, Inc.



David Korn – VP and CCO of Aaron's, Inc.



Marvin Fentress – CCO and General Counsel of Progressive Leasing



Introduction

Obeying the law and acting ethically are two foundations on which Aaron's, Inc. is built. Therefore, we expect all associates to respect and obey applicable laws, rules, and regulations, as well as make the right decision when ethical questions arise. Although we do not expect associates to know the details of all laws, rules, and regulations applicable to the Company, it is important to know enough to determine when to seek advice from your supervisor, Associate Resources, the Compliance and Legal Departments, or other appropriate personnel. Please reach out to any of the many resources available to you if you have any questions.

Associate Responsibilities

Our associates are expected to perform their jobs with professionalism and integrity. Associates must understand and comply with the Code, company policies, and applicable laws, rules, and regulations. We have a responsibility to complete all required training and to communicate with each other and our customers about the standards we've put in place in order to ensure our Company remains an ethical leader in our industry.

Supervisor Responsibilities

Supervisors are required to understand, uphold, and communicate to their associates the values and concepts contained in our Code of Conduct. By being approachable, our leaders create an environment that encourages feedback and reporting in order to make certain that no issue, concern, or question goes without follow-up and resolution.

Open Door Policy

All associates have the right and responsibility to ask questions about issues and situations that are unclear. The Company has an open-door policy that affords each associate honest and respectful communications with their Supervisor and appropriate personnel.

Violations and How to Report

By speaking up and asking questions, we can work together on solutions that make our Company stronger. It is important to communicate any potential behaviors that conflict with our Code, our policies or applicable laws and regulations.

You may report any actual or suspected violations to Associate Resources, the Compliance and Legal Departments, or anonymously by contacting the 24-hour Aarons-Cares Hotline at **1-866-453-5144** or www.aarons-cares.ethicspoint.com

Non-Retaliation

The Company will not tolerate retaliation against anyone who reports in good faith, actual or suspected unethical or illegal behavior. Retaliatory acts can include, but are not limited to demotions, harassment, or loss of employment.



Leading with Success in Our Workplace

- Environmental, Health, and Safety
- Harassment, Discrimination, and Equal Opportunity
- Non-Retaliation
- Conflicts of Interest
- Gifts and Entertainment
- Use of Assets
- Records and Information Management



"It all started with a chair!" – one of the original 300 chairs that Charlie Loudermilk purchased to rent for 10¢ per day to customers in 1955



We Maintain a Safe and Healthy Work Environment

The Company is committed to providing our associates, customers, and visitors with a safe environment by promoting health and safety, and by complying with applicable laws, rules, and regulations. It is the responsibility of each associate to complete the necessary health and safety training and to report any unsafe conditions or practices to their Supervisor, Associate Resources, or by contacting the [Aarons-Cares Hotline](#).

A safe environment also means a secure environment. The Company does not tolerate threats, intimidation, retaliation, or violence of any kind. Weapons and other dangerous devices are prohibited at all times on Company and customers' property. In addition, this prohibition extends to parking lots and Company-owned vehicles, or vehicles rented on behalf of the Company, unless otherwise provided by applicable law.

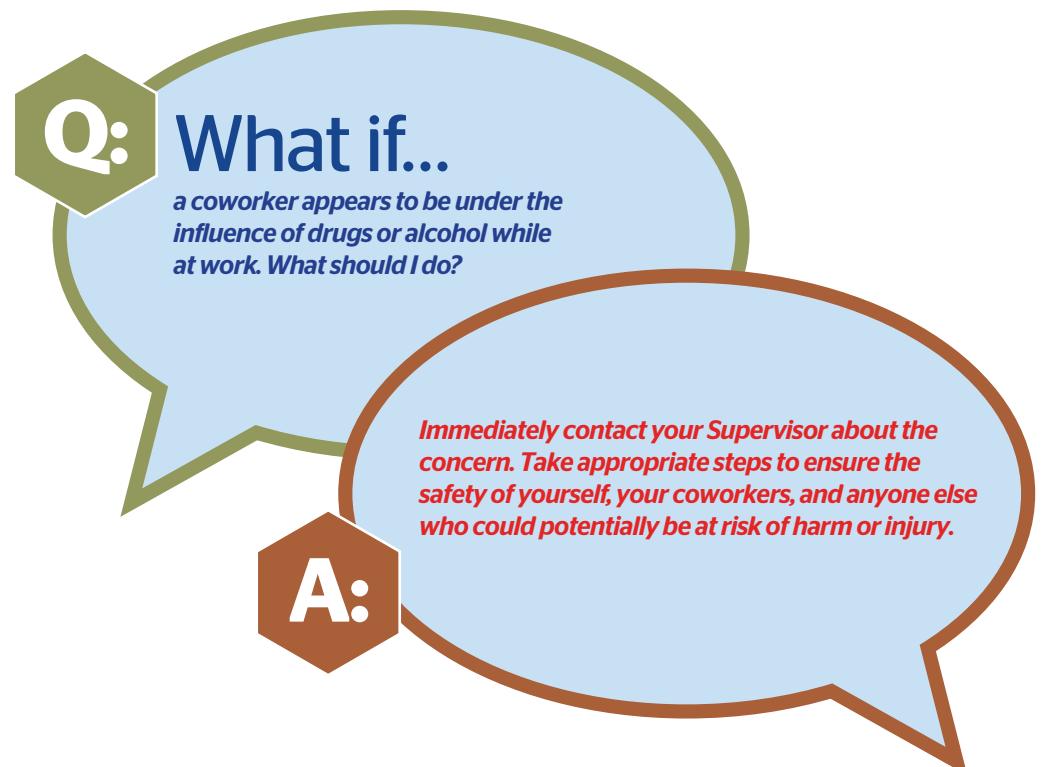
Drug and alcohol abuse can have a serious impact on safety and performance in the workplace. The Company has a zero-tolerance policy for associates who consume, are under the influence of, or have present in their system, alcohol, illegal drugs, or who misuse prescription drugs during working hours.

Associate will be subject to drug testing where permitted by applicable laws when they:

- Are involved in an on-the-job accident causing an injury that requires offsite medical attention, and/or
- Are involved in a motor vehicle accident regardless of fault or injury

When operating a Company-owned or rented vehicle or using a forklift, all associates must:

- Know and follow our Driver Safety Program
- Observe safe driving practices
- Understand and abide by our Cell Phone Use Policy
- Remember that all vehicle accidents regardless of injury or fault will be subject to drug testing



We Treat Others with Respect

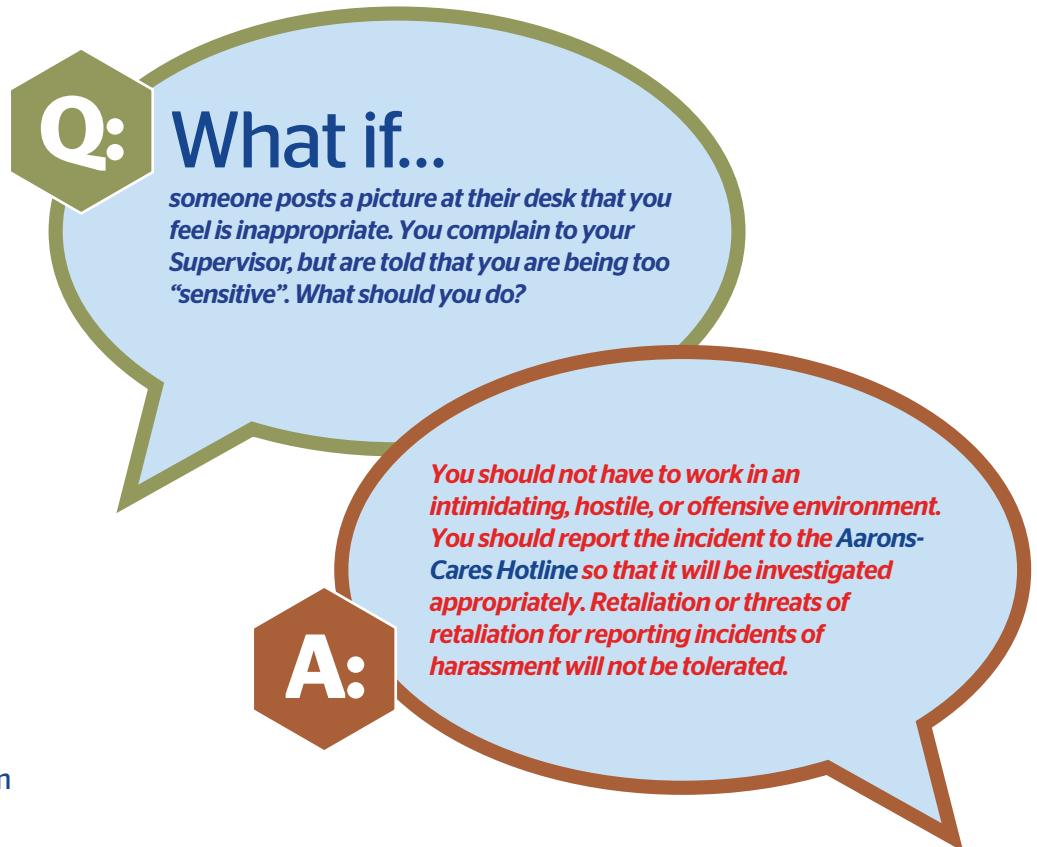
The Company believes that associates should be treated fairly and with dignity by providing a work environment (both on or off premises at Company sponsored social activities and events) that is free from conduct that can be considered harassing, discriminatory, intimidating, and/or disruptive, including sexual harassment.

Harassment may be directed at an individual or it may occur in his or her presence.

Examples of harassment include, but are not limited to:

- Hostile or threatening communications toward an individual or group based on a protected characteristic
- Bullying, such as verbal threats, nicknames, profanity, or slurs
- Joking about someone's ethnic background
- Posting or circulating materials that degrade or express hate against someone because of gender, race, sexual orientation, or ethnicity
- Discussing sexual activities, advances, or desires
- Displaying or discussing lewd jokes, obscene pictures, cartoons, posters, or objects, and/or
- Unwelcome and unwanted hugging or touching

Associates must report any form of harassment or discrimination to the
Aarons-Cares Hotline: 1-866-453-5144 / www.aarons-cares.ethicspoint.com



We Maintain a Positive Work Environment

The Company maintains a diverse and inclusive work environment where differences are valued and respected. Associates should feel encouraged and supported in order to create value and drive professional and personal growth.

We make employment decisions based on merit, and without regard to any characteristic that is protected by law. We represent a blending of associates with diverse experiences, cultures, and backgrounds, and we are committed to respecting each other.

The Company prohibits any form of discrimination and conduct based on grounds protected by local applicable laws which may include the following:

- race
- color
- sex
- sexual orientation
- gender identity
- gender expression
- national origin
- age
- religion
- disability
- pregnancy
- veteran status
- military duty
- genetic information
- any other factor protected by applicable law

Did you know?

The Non-Discrimination & Anti-Harassment Policy and the Equal Employment Opportunity & Open Advancement Policy are located in the Associate Policy Manual and on the Aaron's, Inc. intranet.

Q:

I often overhear some of my coworkers making jokes that include racial slurs. Although the jokes aren't directed at me, I am offended by them. Our facility is small and I'm worried they will take it out on me if they figure out it was me, but I feel like I should say something.

What should I do?

A:

Associates are obligated to report violations of our policies even if they are not the target or victim. You can contact the Aarons-Cares Hotline where you can choose to report the incident anonymously if you wish.

This applies to all personnel actions, including recruiting, hiring, training, promotions, compensation, benefits, transfers, layoffs, disciplinary action, and termination.

We are Fair and Truthful

All associates are encouraged to report in good faith any actual or suspected form of discrimination, harassment, or behavior that is inappropriate, unethical, illegal, or violates our Code, Company policies or laws or regulations. Good faith doesn't mean that the report must be correct, but it does require the information that is reported to be honest and fair. Any associate can submit a report about a perceived violation of the Code, other Company policies or laws and regulations and will not be disciplined or penalized in any way for making the report, if the report was made in good faith.

The Company strictly prohibits and does not tolerate retaliation in response to any good faith report or concern. Retaliatory acts can include, but are not limited to harassment and isolation by your Supervisor, demotions and pay cuts, changes in employment, and/or loss of employment.

If you believe that you have been subject to retaliation, you should contact the **Aarons-Cares Hotline at 1-866-453-5144** or www.aarons-cares.ethicspoint.com. The Hotline is operated by an independent third party and is available 24 hours a day, 7 days a week, 365 days a year.

All reports of possible violations of the Code, other Company policies or laws and regulations, will be investigated promptly. The Company will always employ its best efforts to ensure reports are treated confidentially. Appropriate corrective action will be taken if violations are discovered.

We have a responsibility to ourselves and our peers to act ethically and legally. At times it may seem easier to "do nothing" rather than act, but not acting may lead to serious consequences for the Company and for you.

Did you know?

Retaliation is prohibited against anyone who:

- Files a report in good faith
- Helps someone file a report
- Participates in an investigation

Q:

I recently reported my Supervisor to Associate Resources, and since then I have been excluded from our department's social activities and lunches.

Should I report this?

A:

Yes! *The Company prohibits retaliation for reporting in good faith, actual or suspected illegal or unethical conduct. After reporting, the Company will investigate thoroughly.*

We Act in the Best Interest of the Company

A Conflict of Interest occurs when an individual's personal interest interferes in any way - or even appears to interfere - with the interests of the Company. A conflict situation can arise when an associate, officer, or director takes actions or has interests that may make it difficult for them to perform work objectively and effectively. Conflicts of Interest also arise when an associate, officer, or director or one of his or her friends or a member of his or her family receives improper personal benefits because of the associate's, officer's, or director's position with the Company.

Associates have an obligation to avoid even the appearance of a conflict. Exceptions may only be made after prior review and approval by authorized members of the Legal Department or, in the case of directors or executive officers, by the Audit Committee of the Board of Directors.

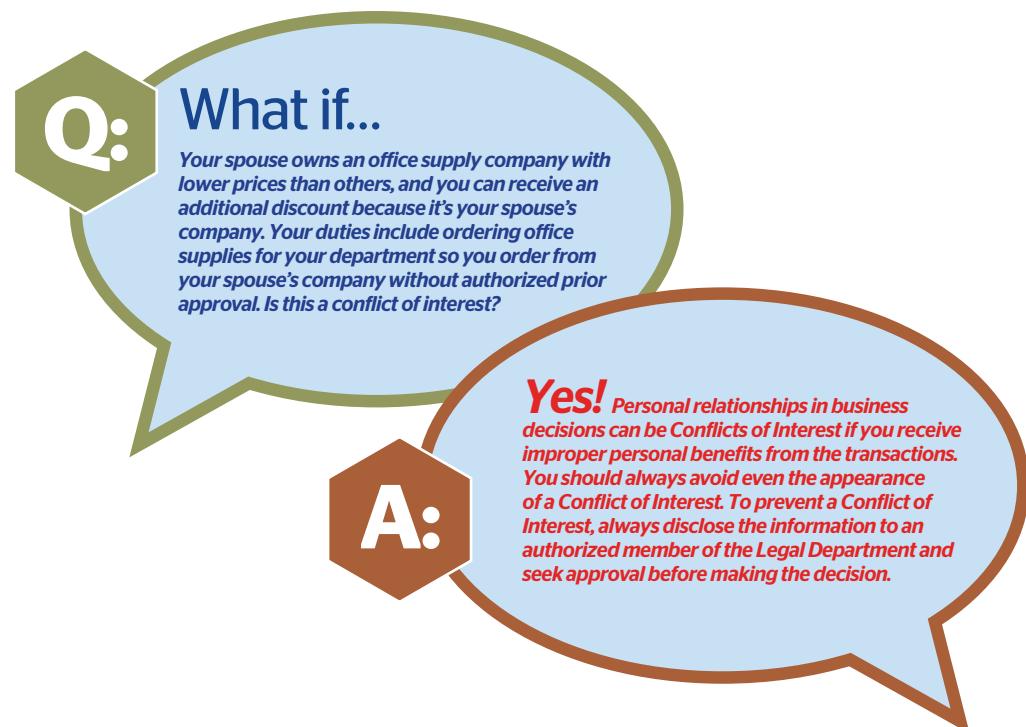
Specifically, engaging in a competing business while employed by the Company is a conflict of interest. In addition, certain relationships with a competing business or an entity that has a material financial or adverse relationship with the Company are also conflicts of interest.

Associates may take on additional part-time work with organizations that are not our competitors, customers, or suppliers. While such work does not constitute a Conflict of Interest, the other job must be strictly separate from the associate's job at the Company and may not interfere with the associate's performance or work time. Also, no additional work may be performed while on the Company's time.

For that reason, you may not, without prior written approval from an authorized member of the Legal Department:

- Engage in any competing business with the Company, or
- Engage in the following activities with a competing business, an entity that has a material financial relationship with the Company or an entity with interests which are averse to or conflict with, the interests of the Company:
 - Serve as a director, officer or as a key person
 - Own more than 10% of the stock or other equity interest, or
 - Provide direct consulting, advisory or other services

The determination of whether a "material financial relationship" exists or whether an interest conflicts with the interests of the Company in a material respect will be made on a case-by-case basis by an authorized member of the Legal Department, or in the case of directors or executive officers, may be made by the Audit Committee of the Board of Directors.



We Comply with Gift, Travel, and Entertainment Policies

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 those activities must follow our guidelines in order to avoid the appearance of persuading anyone to act dishonestly or illegally.

Gifts may be offered, given, provided, or accepted by an associate, or family member, if they:

- Are not a cash gift or equivalent (ie: gift cards)
- Are not solicited
- Do not exceed \$500 of value in any 12-month period to or from any one current or potential customer, vendor 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 associate or the Company if publicly disclosed
- Do not violate any laws or regulations
- Are approved by an appropriate Supervisor

If a gift is received in excess of \$500, 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 written approval.

Such exceptions will be considered on a case by case basis.

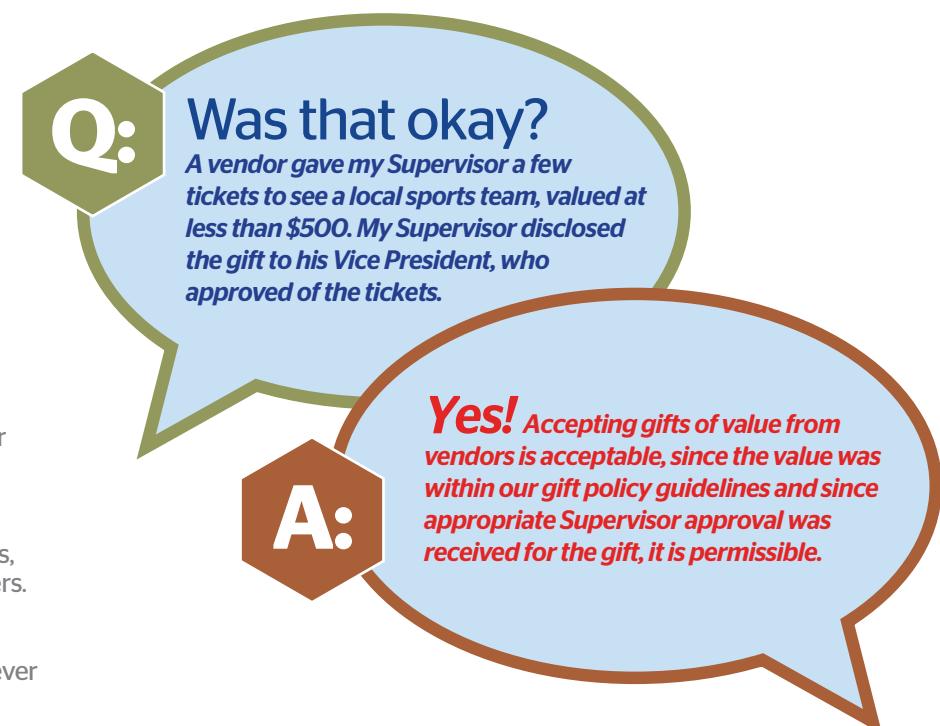
Providing and accepting meals and entertainment must meet the following criteria:

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

Associates may attend business lunches, dinners and similar outings (sporting events, golf outings, theater, shows, etc.), if those outings conform to the criteria listed previously. Vendor sponsored trips require greater scrutiny and must be approved by the General Counsel.

Company funds can be used only for legitimate business travel purposes. Always follow Company travel policies regarding the use of corporate credit cards, preferred travel vendors, necessary management approvals, receipts, expense reports, and other travel-related matters. Gift, entertainment, and travel-related expenses must be promptly and accurately reported.

Always be honest and accurate when submitting expense claims for reimbursement, and never use Company funds for personal travel, gifts, entertainment, or to supplement your income.



We Safeguard Company Assets

The Company provides associates with the use of facilities, furniture, supplies, equipment, information, and technology to be used only for their intended business purposes. Associates should always use and maintain Company assets carefully and protect them from theft, loss, damage, waste, and abuse. Misuse, theft, carelessness, and waste have a direct impact on the Company's profitability and reputation.

We can keep our physical assets safe and secure by following all security rules and procedures such as using your badge when entering facilities and securing valuable equipment.

Additionally, we can keep our information technology resources safe from viruses, malicious software programs, and intrusion attempts by following all information security policies and procedures including:

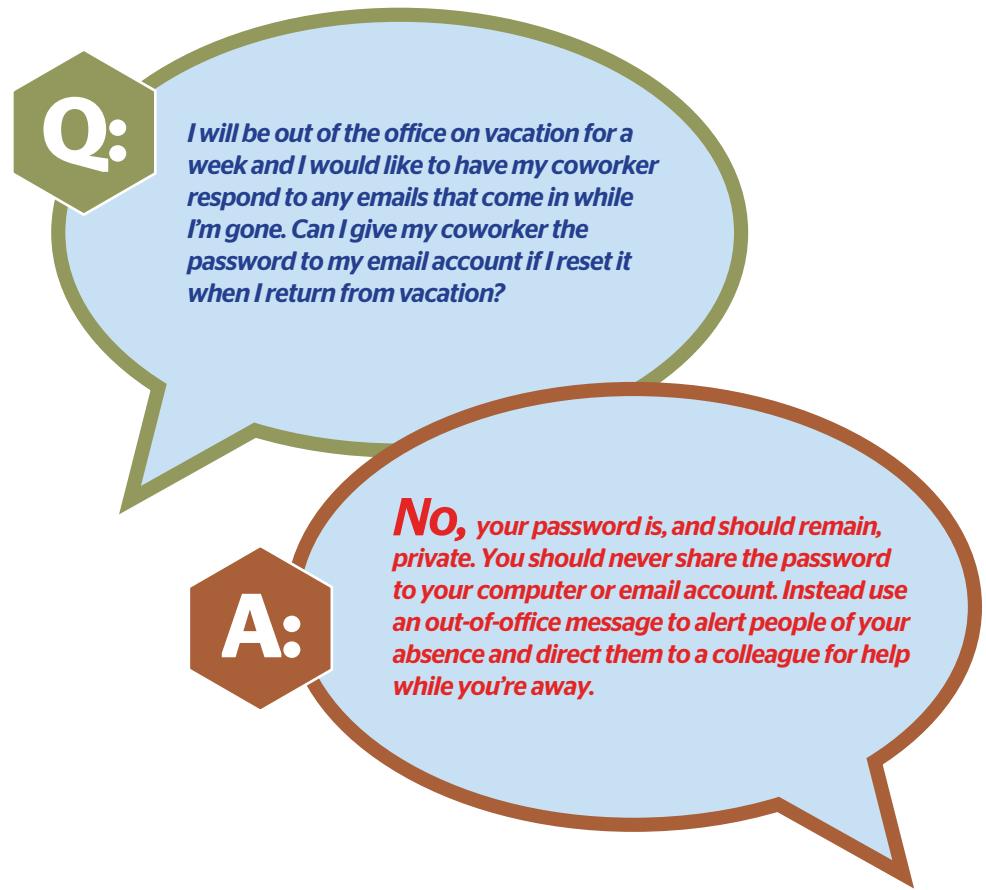
- Do not open any unknown email messages or attachments
- Do not install unauthorized software, applications, hardware or storage devices on your Company issued computer or other device
- Do not access the Company's network via unauthorized applications or devices

Each associate is responsible for all activity performed with their assigned user ID and should always create a strong password in accordance with our policies related to acceptable use and password management.

Did you know?

Company assets include:

- Physical assets - office furniture and supplies, funds and inventory
- Technology assets - computer hardware & software, tablets and phones
- Information assets - trademarks, copyrights and other confidential or proprietary information
- Aaron's, Inc. assets - name, logo, brand and our customer relationships



We Practice Honest and Accurate Record Keeping

Associates must ensure that the Company's business and financial records are accurate and complete. Records and documents that we create and maintain are important Company assets that help the Company satisfy its legal and regulatory obligations and reflects on the Company's credibility and reputation. We must never make false or misleading entries in any Company accounts, financial documents, business reports, or other documents. We should also avoid omitting any information from Company documents if doing so could be misleading.

Associates are required to follow our Records and Information Management Policy and Schedule to properly retain our business records. Proper records management allows the Company to meet legal and regulatory requirements, and educates the associates on how to securely retain and dispose of records that are no longer needed.

At times, active or threatened litigation may require associates to retain records in accordance with the Litigation Hold Policy. This policy states that all records must be retained during the life of the litigation hold, and cannot be disposed of until the hold is released by the Legal Department. Maintaining accurate records and complying with the policy helps us maintain the integrity of our recordkeeping and reporting systems.

When dealing with Company business records, we should always:

- Restrict access to authorized persons and those that have the "need to know"
- Be careful when discussing confidential company information where others might overhear
- Never post confidential Company information on social networking sites
- Never leave printed material containing confidential information in public places
- Dispose of printed records in the secure shred bins that are provided at each location when documents are no longer needed, subject to the Records Retention Policy and Schedule

If you are unsure if a document is a business record, retain and secure it as if it is a business record, and ask your Supervisor or the Compliance or Legal Departments for guidance and clarification.

Did you know?

A "Litigation Hold" is a process used to suspend the destruction of records to (i) preserve all information that might be relevant to actual or anticipated litigation, and (ii) avoid spoliation or deletion.

Q:

I recently found several boxes of old files in a closet. The boxes have "terminated" written on them. Can I stack the boxes next to the trash can at my desk, and write "Trash" on them-so that housekeeping will dispose of the boxes later that night?

A:

No! *Always confirm that the retention period for documents has expired before disposal, and confidential documents should always be disposed of by placing the paper in a secure shred bin. If you have an abundance of paper, please contact the Compliance Department on how to properly store the documents until the approved shredding vendor can come to retrieve the documents for proper disposal.*

Leading with Success for Our Customers

- Competition and Fair Dealing
- Confidentiality
- Protecting Customer Information

Woodhaven
Industries —
Cairo, GA Plant



Progressive —
Partnering in
Mattress Firm Stores



Aaron's —
Sales Associates

R. Charles Loudermilk —
Founder of Aaron's, Inc.

This letter "A" was originally on top of the Aaron's Home Office Building in Buckhead



We Conduct Business Ethically

The Company engages in fair business practices, which means that we conduct business lawfully and ethically at all times when dealing with customers, suppliers, competitors and each other. We are honest and fair in our marketing practices and when discussing the quality, features, and availability of our products and services.

Stealing confidential or proprietary information or possessing trade secrets that were obtained without consent, is prohibited. No associate should take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

We are committed to competing fairly by complying with all applicable laws. Violations of these ethical and fair practices could lead to civil or criminal liability for the Company and the associates involved.

Certain competition and unfair activities are prohibited including:

- Illegal forms of monopolistic practices
- Price fixing
- Bid rigging
- Stealing proprietary information
- Possessing another company's trade secrets without its consent
- Illegal forms of market and customer allocation
- Illegal boycotts

Did you know?

Competition laws may also be referred to as "antitrust," "monopoly," "cartel," and "price fixing" laws. These laws are designed to preserve fair and open competition with our customers, vendors, and competitors.

Q:

We recently hired an associate who worked for one of our competitors. Is it okay to ask her for information about that other company?

A:

Never ask a former associate of a competitor about any information regarding the competitor's trade secrets, and anything else that may be confidential or proprietary to the competing company. The person may be under a Non-Disclosure or Non-Compete Clause. Consult the Legal Department if you have any questions.

We Protect Company and Customer Information

Associates must protect confidential and proprietary information, including data about our Company, our associates, our customers, and the companies with which we do business.

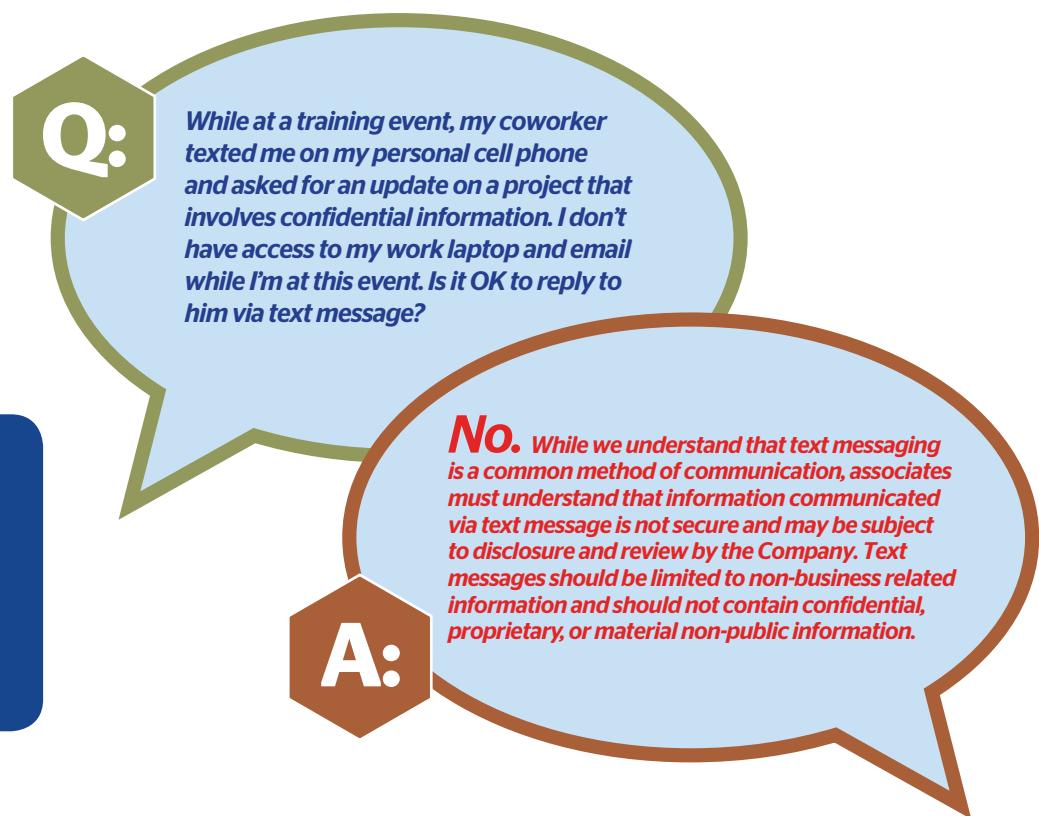
Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. Associates should maintain the confidentiality of information that has been entrusted to them by the Company or the Company's customers, except when disclosure of that information is authorized by the Company or legally required. We must respect and protect this information against loss, theft, or other misuse while following all applicable laws, regulations, and standards.

The Company expects that each associate will preserve confidential and proprietary information even after their employment or relationship with the Company ends.

Associates may never provide confidential information to anyone outside the Company, including the media, unless authorized to do so. Only designated Company spokespersons may communicate to the media.

Did you know?

Confidential associate and customer information is information that could be used to identify a specific person, for example: an address, phone number, driver's license number, Social Security Number, Social Insurance Number, credit card number, birth date, or banking and financial information.



Leading with Success in Our Communities

- Insider Trading
- Anti-Corruption
- Social Media
- Government Relations, Political Activities, and the Media



Aaron's Galleria
Store Support Center –
Atlanta, GA



Progressive
Headquarters –
Draper, UT

Aaron's, Inc. -- the industry leader in Sales and Lease Ownership of residential furniture, consumer electronics, computers, and home appliances



We Protect Inside Information

We expect associates to abide by applicable insider trading laws. U.S. federal securities laws prohibit the purchase or sale of securities by an associate based upon his or her awareness of “material non-public information”. These laws also may, depending on the facts and circumstances, prohibit associates who are aware of material non-public information from disclosing (or “tipping”) that information to any person who might trade while aware of the information. Associates can be held responsible for the trades of persons who received material non-public information even if those persons do not trade in Company securities but are aware of the material non-public information.

“Material non-public” information is information that investors likely would consider important in deciding about whether to buy, sell or hold Company securities, such as its common stock. Non-public information that could reasonably be expected to affect the market price of the Company’s securities or information that investors would possess once it is made public is almost always material, non-public information. Information is “non-public” if it has not been widely disseminated to the public through major newswire services, national news services, or public filings with the U.S. Securities and Exchange Commission (the “SEC”) or through a Company call or conference that is open to investors on a broad, non-exclusionary basis.

As an associate, you may have access to material, non-public information that may include:

- Non-public financial results and forecasts
- Impending or actual litigation
- Changes in our executive officers
- Mergers, acquisitions, or sales transactions
- New earnings forecasts or projections
- Changes in the amount of the Company’s dividend
- Gaining or losing a major new retail partner, and/or
- Stock repurchases or debt offerings

Remember, even if you leave the Company, these policies apply to you. If you think material, non-public information is being used improperly or in violation of our policy or the law, report it to the **Aarons-Cares Hotline**, or to the Compliance or Legal Department.

Did you know?

Violations of the U.S. federal securities laws can be prosecuted even when the amount involved is small or when the “tipper” made no profit at all. Persons violating insider trading or tipping rules may be required to disgorge the profit made or the loss avoided by the trading, pay civil or criminal penalties, or serve a jail term of up to ten years.

Q:

I learned that our Company is considering acquiring another publicly-traded company. Is it Ok to buy the stock of this company in expectation of the acquisition?

A:

No! *Trading on material non-public information is illegal and a violation of the Code of Conduct, whether you are trading in the stock of our Company or another company.*

We Conduct Business with Integrity

We are committed to fair business practices in the United States and abroad. Corruption hinders the development of trustworthy business and it hurts our Company, associates, and customers. 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, associates must avoid even the appearance of bribery or corruption when dealing with any vendor, customer, or public official. Associates 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.

Depending on the facts and circumstances, U.S. federal and/or state criminal law may prohibit making payments to public officials that appear to be “bribes” or inappropriate “gratuities”. 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. Gratuity payments can include “thank you” payments after an official has already taken an action. Many state laws prohibit the same or similar conduct.

Anti-bribery laws prohibit U.S. companies and their officers, directors, associates, or agents from corruptly offering, paying, promising, or authorizing a payment of anything of value to foreign government officials for inappropriately influencing the officials’ actions.

Common corruption scenarios include:

- Mischaracterizing bribes as “commissions,” “subcontracts,” or various “fees” in expense reports and accounting records
- Illegal payments of large commissions to agents and other third parties to secure work
- Illegal payments to charities favored by or associated with foreign government officials
- Illegal payments to foreign customs officials and police officers
- Illegal payments to officials to get building permits or utility service
- Inappropriate payments to officials to influence contract awards
- Illegal payments to relatives of government officials, and/or
- Illegal payments to third parties selected by government officials

Did you know?

“Anything of value” isn’t just cash; it can be a gift card, stock, a loan, a discount, a job, entertainment, tickets, or even a simple favor.

Q:

Our Company donates a lot of supplies and time to the local police charity. I recently was stopped for speeding. Can I remind the officer of our “generous” donations?

A:

No! We cannot use the Company’s donations as a means of influencing the officer to do or not to do an official act.

We Communicate Responsibly and Accurately

Social media websites and applications are useful marketing tools and can help drive our business. While the use of social media may provide associates a positive forum for information sharing, networking, and social interaction, its use can also blur the lines between associates' professional and personal lives. We do not intend to restrict the flow of useful and appropriate information, but instead wish to minimize the risk to our Company and associates.

Associates participating in social media as part of their job responsibilities must follow the policies and procedures prescribed for Company-owned social media networks. This also applies to the use of social media when away from work, including when using a personal computer or device and when using a non-Company hosted social media site, if the individual's employment affiliation is identified, known or presumed.

No associate is authorized to communicate using social media on the Company's behalf without prior approval by the Company. Associates may not develop and post a social network page or site that appears to represent the Company, or any affiliate, without prior approval and involvement of the Company.

Social media rules to follow:

- Always be honest and respectful of others
- Always use good judgement
- Always protect personal information and don't disclose anything that could violate associate or customer privacy
- Always protect confidential information and don't disclose anything that could harm business interests
- Always comply with policies, laws, and regulations that protect people, privacy, copyrights, and confidentiality
- Always speak positively about the Company

If you learn that someone posted a hostile, angry, or accusatory comment about the Company online, you should not engage in the conversation, and report the information to the Compliance or Legal Departments, or the **Aarons-Cares Hotline**.

Did you know?

Social media includes any means of electronic communication or posting of information or content of any sort on the Internet, including your own or someone else's blog, journal or diary, website, social networking web site, web forum, or chat room.

Q:

I have a blog where I talk about my life and my work. Should I be concerned about what I say about my job?

A:

Associates are expected to use good judgment when posting information about the Company, co-workers, and their job. Never post confidential or proprietary information. Associates are personally responsible for the content you publish online, and should never assume posts are private, or will remain private.

We are Involved in Our Communities

Doing business with the government, whether federal, state or local, on either a direct or subcontractor basis, imposes special obligations on the Company. Government business proposals must be reviewed by and receive approval from the General Counsel before being accepted. The Company encourages associates to participate in the political process, but personal participation, including campaign contributions or support, is completely voluntary. There must also be a distinction between the political activities of associates and those by the Company itself.

- Contributions by an associate to political campaigns where allowed by law and with General Counsel approval must not be made with, or reimbursed by, Company funds.
- Individual political activity must be done on an associate's own time with his or her own resources.
- Company time, offices, computers, and other resources may not be used to support political campaigns.
- If you engage in individual political activity, please make it clear that you are not representing or acting on behalf of the Company.
- Political participation, campaign contributions, and similar support may only be undertaken on the Company's behalf by the General Counsel or his/her designees.
- If you wish to run for a political office, you must obtain permission from the General Counsel prior to running to avoid a potential conflict of interest.

Lobbying is a normal, acceptable, and useful part of the legislative process, provided it is conducted in compliance with all applicable legal requirements. It is the Company's policy to strictly comply with all lobbying laws and regulations. Associates are required to consult with the General Counsel before engaging in or retaining anyone to engage in lobbying about the business of the Company. Lobbying laws do not apply to individual political expression that is not on behalf of the Company. Associates may work to influence legislative bodies relating to issues of personal concern as long as you do not mention the Company or use any Company resources (letterhead, e-mail accounts, etc.) that might give the appearance you are acting on the Company's behalf.

Only designated Company spokespersons may provide comments to the media. Associates may not provide non-public corporate information to anyone outside of the Company, including the media, unless authorized to do so. In all cases, associates must refer media inquiries to the Director of Public Relations. No associate may comment on legal matters, or matters you believe may have legal consequences, without the prior written consent of the Legal Department. Media inquiries regarding legal matters must be referred to the Legal Department.

Did you know?

Proper lobbying activities can educate lawmakers about the Company's legitimate interests. Laws and regulations governing lobbying or attempts to influence government officials vary around the world.

Resources and Important Numbers

Aarons-Cares Hotline

1-866-453-5144

www.aarons-cares.ethicspoint.com

Compliance Department

Compliance@aarons.com

Legal Department

678-402-3340

Legal@aarons.com

Associate Resources

AssociateResources@aarons.com

Director of Public Relations

678-402-3863

Glossary of Terms

Aarons-Cares Hotline

The Company's reporting service, administered by a third party where associates can ask questions or raise concerns about any actual or suspected violation of the Code of Conduct or other ethics, policy, and/or compliance matters. It is available 24 hours per day, 7 days per week via phone and internet, and allows for anonymous or self-identified communications.

Anything of Value

Anything that might have value, including cash, gifts, meals, entertainment, business opportunities, and/or Company product.

Antitrust or Competition Laws

Laws that are designed to preserve fair and open competition with our customers, vendors, and competitors.

Assets

Anything owned by the Company, including physical property, technology, financial, and information assets or records.

Associate

An individual who is employed directly by the Company. All associates are employed on an at-will basis and this employment relationship may only be altered by a written agreement signed by the CEO. The policies contained in the Code of Conduct and other Company manuals and policies do not constitute an express or implied employment contract and do not alter the at-will basis of employment.

Bribe

Giving, offering to give, or authorizing to give anything of value to someone outside of the Company with the intention to influence a business decision.

Compliance

Having internal policies and procedures designed to prevent and detect violations of applicable law, regulations, rules, and ethical standards by associates. It involves legal, risk management, and internal controls.

Confidential

Information that is critical to ongoing business operations and could impede or disrupt them if disclosed without authorization or if made public, including personally identifiable information, audit reports, accounting information, business plans, etc.

Conflict of Interest

A situation or the appearance of a situation where personal interests interfere with the Company's interests.

Discrimination

Treating an individual differently or less favorably based upon a characteristic that is protected by applicable law such as race, color, pregnancy, religion, sex, sexual orientation, gender identity, national origin, age, disability veteran status, military duty, genetic information, and/or gender identity.

Ethical

Being in accordance with the policies, laws, rules, and/or regulations for correct conduct.

Fair Dealing

Each associate, officer, and director should strive to deal fairly with the Company's customers, suppliers, competitors, and associates. No one should take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other unfair-dealing practice.

Good Faith

Honestly believing in what you're doing and/or saying so that a false report is not made.

Harassment

A pattern of physical or verbal conduct which is based upon a characteristic that is protected by applicable law such as race, color, pregnancy, religion, sex, sexual orientation, gender identity, national origin, age, disability veteran status, military duty, genetic information, and/or gender identity and which a reasonable individual would regard as undesirable or offensive.
Insider Trading - the illegal practice of using material, nonpublic information, or tipping someone else to use it, to buy or sell stock in a Company to one's own advantage.

Integrity

Having an uncompromised adherence to high ethical conduct and standards.

Legal Hold

A process that the Company uses to preserve all forms of documents and files that may be responsive to, or relevant to, any litigation, potential litigation, governmental audit, or governmental investigation, that is reasonably anticipated or ongoing.

Lobbying

To conduct activities aimed at influencing public officials and especially members of a legislative body on legislation

Material Financial Relationship

Relationship in which the associate benefits by receiving a salary, royalty, intellectual property rights, consulting fee, ownership interest (e.g., stocks or stock options), or other financial benefit.

Material Nonpublic Information

Information about the Company that has not been made public, which could affect its share price and investment decisions as soon as the information has been made public.

Official Business Records

Company documents, files, or other information created, received, or obtained by any associate by any means that has a specific document retention period; records are not specific to any format or media and may take many forms.

Non-Compete Clause (NCC)

An agreement under which an associate agrees not to enter or start a similar business in competition against another employer or company.

Non-Disclosure Agreement (NDA)

A contract by which one or more parties agree not to disclose confidential information that they have shared with each other as a necessary part of doing business together.

Proprietary

Also known as a trade secret, is information a company wishes to keep confidential, including secret techniques, processes, and methods used in production or sales.

Retaliation

Occurs when an employer punishes an associate for engaging in legally protected activity. Retaliation can include, for example, an adverse employment action such as a demotion, discipline, firing, salary reduction, or reassignment to a different job or shift.

Social Media

Forms of electronic communication through which users can create online communities to share information, ideas, personal messages, and other content.

Supervisor

A person in management who monitors and regulates associates in their performance of assigned or delegated tasks. Supervisors are usually authorized to recommend and/or effect hiring, disciplining, promoting, punishing, rewarding, and other associated activities regarding the associates in their departments.

Theft

Taking something for yourself that belongs to someone else.

Zero Tolerance

A way to eliminate undesirable behavior among associates and provide an automatic punishment for violating company policies and rules.

Acknowledgement

I acknowledge that I have received and read and I agree to abide by the Aaron's, Inc. Code of Conduct (the "Code"). I understand the standards and policies contained in the Code and that there may be additional policies or laws that apply to me. I understand my responsibilities with respect to these standards and policies, and I will comply with these standards and policies.

I understand that any violation of this Code will subject me to disciplinary action up to and including termination of employment and that the Code does not change the "at-will" status of my employment relationship.

I agree that I will report any violation or suspected violation of this Code by either contacting the Aarons-Cares Hotline or the Compliance or Legal Department.

Printed Name

Signature

Position

Date

Aaron's, Inc.