

INTEGRITY PLAYBOOK:

THE “HOW” OF JACK
(AKA CODE OF CONDUCT)*



*This document used to be called the “Code of Conduct,” and that’s what it’s still called at most companies. We’re not “most companies.” Darin’s introduction explains why we’ve changed the name. But we’ll still occasionally call it the “Code of Conduct,” so that regulators and others who want us to be like “most companies” don’t get too confused. As a general rule, we feel pretty strongly about behaving ethically and not confusing regulators.

NOTE FROM DARIN HARRIS, CHIEF EXECUTIVE OFFICER & DIRECTOR

Welcome to our new Integrity Playbook. It's designed to help you deal with those tough situations where figuring out the ethical answer isn't necessarily easy, clear, or obvious. This Playbook doesn't have all the answers or address all possible ethical issues that you might encounter as you carry out your responsibilities... it can't do that. But it's a resource designed to answer many of these questions, to refer you to other helpful resources and – most importantly – to give you the tools to think through ethical challenges properly.

Why are we calling this our “Integrity Playbook”? I suspect you probably think of it instead as our Code of Conduct, which is how it's been known for the past several years. But “Code of Conduct” isn't quite right. A “Code” is generally thought of as a collection of rules or laws. Ethics is different. Ethics is about values, not rules. To me, a conversation about ethics doesn't belong in a document called a “Code.”

Once upon a time, this document was simply called “Trust.” This captures much more closely what this Playbook is all about, but it's still not quite right. Trust is something we want to earn from our stakeholders, but it doesn't offer guidance on how to earn it. Stated perhaps too bluntly, it's not hard for bad actors to earn the trust of people by simply saying things their audience wants to hear. That trust may not be justified, but it is nevertheless quite real.

This is where “integrity” comes in. The focus of “integrity” is on adherence to moral and ethical principles. When people act with integrity, the right kind of trust happens. Where “trust” is all about the what, “integrity” is all about the how. That's why I like the idea of grounding this document – right down to its subtitle (“The “How” of JACK”) – in the concept of integrity.

The integrity of our Company and of our Jack in the Box® brand has been and remains the key to our past, present, and future success. Because we are the stewards of our reputation, each of us has personal responsibility to act with integrity and thereby earn the trust of everyone with whom we deal. I know I can count on you to continue to do so.

Thank you!

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SOME QUICK NOTES BEFORE WE BEGIN

A NOTE TO OUR EMPLOYEES AND DIRECTORS

This Integrity Playbook applies to each of us, regardless of whether we work in our Corporate offices, in our field offices, in Jack in the Box restaurants, or from home. It applies to members of senior management, and it applies to our Company's Board of Directors. And while they are not strictly bound by this Playbook, we expect others with whom we do business, including franchisees and suppliers, to understand the standards of integrity by which we do business and to act accordingly. Each of us is an ambassador for our Company and for the Jack in the Box brand.

A NOTE TO OUR FRANCHISEES

When your guests visit one of your restaurants, they don't necessarily know (or care) whether it's owned by a franchisee or by the Company. This means that your actions and behavior, and the actions and behavior of your employees, impact the reputation of the entire brand. It's therefore in our mutual interest that your guests' experiences are consistently great ones.

Even though you and your employees aren't employees of Jack in the Box Inc., you're the face of the Jack in the Box brand in your dealings and interactions with your guests and your community. That's why our agreements with you contain provisions requiring not only that you comply with all laws and regulations, but also that you do nothing to harm the goodwill and reputation of the Jack in the Box brand. For these reasons, we expect you to read and understand this Playbook, and to rely on its guidance in ensuring that your actions are consistent with the expectations spelled out in our agreements with you.

You're also welcome to adopt this Integrity Playbook for your own operations if you'd like. If you elect to adopt this Playbook for your own operations, your employees should understand that you, and not Jack in the Box Inc., are their employer, and that they should reach out to the appropriate manager of your organization, rather than to the corporate resources identified in this Playbook, if they have any questions or concerns.



TRUST — DOING IT JACK'S WAY

Ever since Jack in the Box served its first hamburger in 1951, our Company has built a reputation for quality, value and integrity. The continued success of our Company and the Jack in the Box brand depends upon our earning and maintaining the trust of our guests and all of our other stakeholders, including fellow employees, franchisees, suppliers and other business partners, shareholders, and the communities in which we do business. We earn and maintain that trust by never failing to do the right thing.

OUR LEGAL OBLIGATIONS

Anything we do on behalf of the Company and its brands must be both legal and ethical (these are not always the same thing). This means that we must comply with both the letter and **the spirit** of the law, and do the right thing when there are no rules or laws to guide us. Our stakeholders expect no less from us, and we should expect no less from each other.

OUR INTEGRITY PLAYBOOK

This Integrity Playbook describes our expectations of everyone who acts on behalf of, or represents our Company or its brands. It is a guide and a resource. It's intended as a supplement to, not a substitute for your own good judgment. It should be kept handy and referred to whenever you have any questions about doing what's right.

Each of us is expected to read, understand and behave consistently with the letter and spirit of this Playbook as well as all other Company policies, and to report in good faith any suspected violations. Failure to do so may result in disciplinary action, including losing your job. Consequently, be sure to consult with your immediate supervisor, the Ethics Office, or the Legal Department if you have any questions about this Playbook or about what is or is not acceptable conduct.

HERE'S WHAT THIS PLAYBOOK IS NOT:

- It's not a comprehensive rulebook that covers every issue we are likely to face. You won't find all of the answers here. All employees are also expected to know and understand our Company policies and any other rules and procedures that you rely on to carry out your responsibilities. If you have questions about our policies, rules, and procedures (such as where to find them), speak to your boss and they should be able to point you in the right direction. Or jump on the Hub – most of what you're looking for can be found there as well.
- It's not a summary of all laws and regulations applicable to the Company or the Jack in the Box brand. Being a California company, we couldn't possibly summarize all such rules and regulations. That's why we keep so many lawyers on our payroll. Also because we like them.
- It's not a contract and it doesn't create a contractual relationship between you and the Company.

Each of us is expected to read, understand and behave consistently with the letter and spirit of this Playbook as well as all other Company policies, and to report in good faith any suspected violations. Failure to do so may result in disciplinary action, including losing your job. We may be nice people, but we're not kidding about this. Consequently, if you have any questions about this Playbook or about what is or is not acceptable conduct, be sure to consult with your immediate supervisor, the Legal Department, or the Ethics Office (which is pretty much just like the Legal Department, only we frown more and use smaller words in our speaking and writing).

HOW TO MAKE ETHICAL DECISIONS — A SIMPLE TOOL

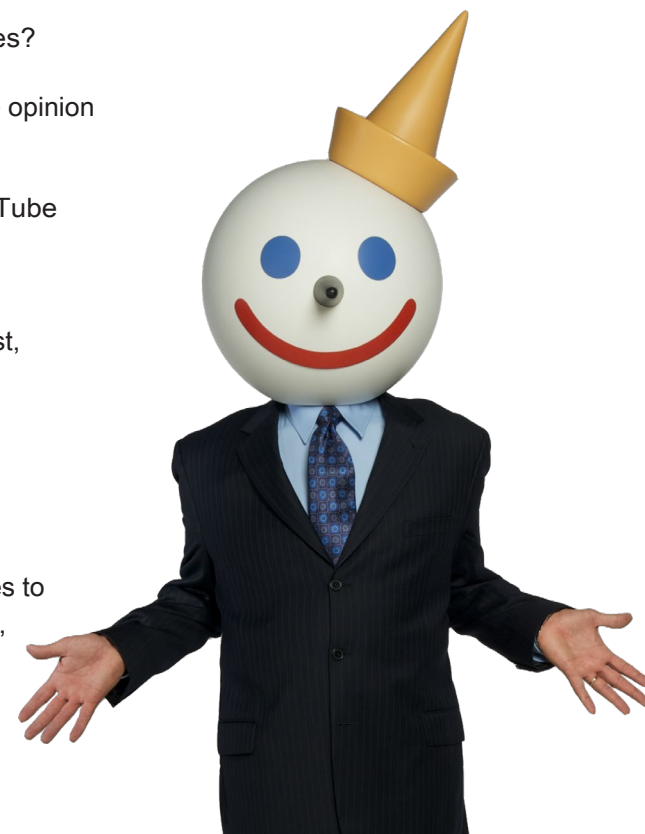
Making ethical decisions is a critical part of our day-to-day lives. This Playbook, and the variety of other tools and resources discussed in this Playbook, are all designed to make this process easier. But perhaps the simplest process can be summarized in this “What Would Jack Say?” Checklist.

WHAT WOULD JACK SAY?

Whenever you're faced with making an ethically challenging decision, ask yourself the following questions:

- Is it legal?
- Is it consistent with the letter and spirit of the Integrity Playbook and other Company policies?
- Would I do it if I knew my spouse, significant other, parents, kids, coworkers, or others whose opinion and respect I value (like, maybe Oprah) were watching?
- Would I be comfortable with people seeing or learning about it on Instagram, Facebook, YouTube (or in print versions of publications such as USA Today or Time magazine that geezers like your Chief Legal Officer still read)?
- Will I feel good about my decision tomorrow -- some ethics folks refer to this as the “mirror test, as in “how will I feel about myself when I look in the mirror after making this decision?” (Some of us won't look at ourselves in the mirror even under the best of circumstances, so this test won't necessarily work for us.)

If you can answer “yes” to each of these questions, your ethical compass is pointed in the right direction. But be aware: while this checklist is quite simple, sometimes the ability to answer “yes” to each of the questions isn't nearly so simple. We understand this, which is why we have resources to whom you can turn when faced with a challenging ethical situation. These include the Ethics Office, the Legal Department, Human Resources, and the Ethics Hotline, as well as your own supervisor and company management generally.





**OUR COMMITMENT TO
OURSELVES AND EACH
OTHER**

PERSONAL ACCOUNTABILITY

In everything that we do, we must behave in a manner that inspires the trust of our guests, our fellow employees, franchisees, suppliers and other business partners, shareholders, and our communities.

This means obeying the law. But it also means being familiar with, understanding, and acting in accordance with the letter and spirit of this Playbook and with Company policies and procedures. Further, it means doing the right thing even where answers can't easily be found in laws, in this Playbook, or in our policies and procedures. And it means accepting accountability and responsibility for the actions you take and for the consequences of those actions.

It also means reporting issues and concerns without fear of retaliation. Accordingly, if you have any questions or concerns about your actions or the actions of others, we encourage you to speak with your supervisor, other members of management, Human Resources, the Ethics Office, or report it through the Ethics Helpline. If you report your concerns in good faith, our commitment is to protect you from retaliation. Indeed, anyone who retaliates or attempts to retaliate in response to a good faith report will be subject to discipline up to and including being fired.

PROTECTING OUR COLLEAGUES' PRIVACY

In this incredibly transparent, "big-data" world in which we live, we all still hope and expect that our personal information will be protected from improper disclosure. For this reason, none of us should collect or maintain personal or confidential information about other employees unless it's necessary for and directly related to our work. And we're not to share such information with others inside or outside of the Company. Any requests for such information should be referred to Human Resources or the Legal Department.

Q&A

What does diversity have to do with running a good business?

Never forget that this Company is, first and foremost, a collection of valuable resources called people. The wonderful variety of experiences and characteristics that these people bring to work everyday enables us to see and understand our guests, franchisees, suppliers, and business colleagues through a rich and varied set of perspectives that make each of us better at what we do, and that make our business relevant to each of our key stakeholders.

RESPECTING AND VALUING THE THINGS THAT MAKE US DIFFERENT

The different views, backgrounds and experiences of our employees, our franchisees, our guests, and our other stakeholders make us a better company. We should welcome and embrace such differences, rather than stigmatize or stiff-arm them. This means that we won't tolerate discrimination or unwelcome conduct of any kind based upon gender, sexual orientation, color, race, religion, national origin, age, physical or mental disability or other such personal characteristics. As we like to say around here, "Different Rules!" Accordingly, each of us is responsible for helping ensure that equal opportunity exists at the Company both in policy and in practice.



TREATING PEOPLE FAIRLY AND WITH RESPECT

We are in a service business, so we understand the importance of treating people well — all people and not simply our guests. This means that we expect everyone throughout our system to be treated with fairness, respect and dignity.

Consistent with this, we're committed to a work environment that is free from any form of harassment. We won't tolerate behavior that creates an intimidating, offensive, abusive or hostile work environment. And to be clear, when we say we won't tolerate any form of harassment, this includes sexual harassment. Such conduct includes unwanted sexual advances, unwelcome touching, inappropriate sexual jokes or innuendo, and any other conduct of an unwanted sexual nature.

CREATING A SAFE AND HEALTHY WORK ENVIRONMENT

The Company is committed to the health and safety of our employees, our business associates, and our customers. Each of us is responsible for taking the steps necessary to create and maintain a safe and healthy work environment. These include:

- Taking necessary precautions to protect your co-workers and yourselves;
- Immediately reporting accidents, injuries, and unsafe or unhealthy practices or conditions;
- Immediately reporting acts of violence or physical or verbal threats of violence to your supervisor, or to Asset Protection, HR, or the Legal Department;
- Observing facility security procedures and properly using all available security equipment (including wearing your ID badges in a visible way whenever you are in one of our buildings);
- Doing your work free from the influence of alcohol, of marijuana, or of any illegal or controlled substances that could prevent you from performing your job safely and effectively.

Finally, let's be sure to remember that these responsibilities are not limited to operations within the four walls of the workplace. Many of you spend time on the road, and you should carry the safe and healthy workplace attitude with you when you drive, fly or otherwise travel in connection with your work.

Q&A

I have reason to believe a colleague has been drinking alcohol on the job. What should I do?

Your colleague is endangering himself and the Company. Notify Human Resources, and the situation will be investigated and addressed discreetly and appropriately. If you're more comfortable reporting the concern anonymously, you may do so using the Jack in the Box toll free Ethics Helpline at 1-888-613-JACK.

Recreational marijuana use has recently been legalized in our state. I assume this means that I shouldn't be concerned if I'm aware that a colleague is lighting up during her lunch hour and then returning to work.

You should be concerned and you should report her (as you would a colleague who you suspect is drinking on the job). Don't forget that alcohol has been legal for, like, forever, and legal or not, we still expect to be notified if someone is drinking alcohol (or smoking pot) on the job. The issue isn't legality – it's safety. Sorry to be a buzzkill.

Q&A

It's nice to talk about ethics, but we're also constantly being reminded about the importance of achieving business results. Is this Playbook for real, or will business goals always be more important than ethics?

This Playbook and its expectation are for real. Good businesses like ours set ambitious goals and strive to achieve them, but only through legal and ethical means. You must never violate ethical standards to achieve business goals. If you feel pressured to do so, be sure to (a) speak with your supervisor or another supervisor or member of management whom you trust, (b) contact our Ethics Office, by email, at ethics@jackinthebox.com, or (c) if you'd prefer to remain anonymous, call the Jack in the Box toll free Ethics Helpline at 1-888-613-JACK.

RESPONSIBILITIES OF MANAGERS AND SUPERVISORS

Everyone in the organization has a duty to live up to the standards set forth in this Playbook. But, while leadership may have its privileges, people in management and supervisory positions have extra responsibilities for setting an appropriate “tone at the top” and “tone at the middle.” This is pretty much the very core of what leadership is all about. So, if you're in a supervisory or management role, you must:

1. Set a positive example, and exhibit the highest level of integrity at all times. Integrity is contagious, and you must do everything you can to spread it throughout the organization.
2. Meaningfully and effectively communicate this Playbook to each member of your staff. Simply distributing the Playbook is not enough. Discuss the Playbook, why it's important, and how it should be used. Help bring it to life for your employees by referring to it when tough questions arise or periodically at staff meetings. Take ethics seriously but let's also make it relevant and engaging.
3. Work with HR to ensure that each new hire completes ethics training within 30 days of hire.
4. Work with HR to ensure that each employee executes the agreement to abide by the Integrity Playbook.
5. Provide additional information to those whose duties and responsibilities require it. For example, because of the unique ethical risks associated with procurement and supply chain functions, officers and supervisors in those functions must make sure that their employees have all the tools necessary to do their jobs legally and ethically.
6. Be diligent in recognizing signs of illegal or unethical conduct and take appropriate steps to respond to violations of law, policy or this Playbook, by following the reporting procedures explained in the last pages of this Playbook.
7. Encourage your employees to ask questions and raise ethical issues, and promptly act upon any reports, including relaying them to the Ethics Office where appropriate.
8. Take steps to assure that you don't hire or promote anyone who you have reason to believe may not live up to our values or ethical standards.



OUR COMMITMENT TO OUR GUESTS

Q&A

I saw a safety problem at one of our restaurants the other day, but didn't really want to get involved. It wasn't my area and I was already late for a meeting, so I didn't need the hassle. Am I right to assume the restaurant's management will take care of it?

Safety is everyone's business. The restaurant's management might not be aware of or notice the problem, and one of your colleagues could be seriously injured or killed. Your duty is to notify management immediately.

Integrity should be at the heart of every interaction with our guests. This requires more than offering delicious, craveable food in a flavorful setting with friendly service. It requires behaving with the highest level of honesty and integrity. Our guests have many dining choices – we want them to feel proud to say that Jack in the Box is one of their favorites.

TRUST AND EXCELLENCE

Trust and Excellence In The Food We Serve

The highest trust our guests place in us is the belief that we'll provide them with safe, high quality food. To meet and exceed these expectations, and to earn this trust, we have developed a comprehensive food safety program. Following our food safety standards and procedures at all times will protect our guests, and ultimately our employees, shareholders, and other critical stakeholders. Food safety, therefore, is the most fundamental ethical responsibility of each employee, whether you work in the restaurants, visit the restaurants from time to time, or have any responsibilities that impact our guests or our food. If you fit this description, you must always make sure that:

- **You are familiar with food safety procedures relevant to your roles and responsibilities.**
- **You recognize improper food safety procedures and correct yourself and your co-workers.** Don't cut corners and don't allow others to take short cuts, even at the busiest times.
- **You do your part to ensure we follow procedures** (like handwashing, disposal of expired food, and accurate completion of food safety documentation).

Trust and Excellence In How We Treat People

Our guests should always be treated as we want to be treated when we go out to eat — courteously, honestly, and respectfully. And just as we must always respect and value the diversity of our colleagues, we must also do so with our guests.

Trust and Excellence In How We Advertise

Our reputation depends upon advertising and marketing activities that are always truthful and accurate, and are not deceptive or misleading. Fun and funny and true and accurate is fine; deceptive and misleading... not so much. These expectations apply whether we are talking about our own products, services, and activities, or those of our competitors. We demand nothing less because it's the right thing to do. It's also (conveniently) the legal thing to do.

If your responsibilities involve marketing or advertising, you need to be familiar with and comply at all times with all applicable laws (federal, state and local) regarding these practices. Because of the complexity and constantly-evolving nature of consumer protection laws, as well as the dangers associated with getting them wrong, our marketing and advertising activities should always be reviewed with and by our lawyers (or as our Marketing friends refer to them, "those killjoys in the Legal Department").

Trust and Excellence In How We Maintain The Privacy Of Guest Information

As we rely more and more on credit card transactions, customer loyalty programs, and connecting with our guests through social media, maintaining the trust of our guests requires that we only use guest information for appropriate business purposes. If you pay attention to the news, you know how dangerous it is for companies to get this wrong (and boy-howdy, do companies ever get this wrong!). Because of these risks, and because it's the right thing to do, we're committed to complying with state and federal privacy laws and protecting the privacy of our guests and other consumers. Again, any questions you have concerning the appropriate use of guest information should be reviewed with your friends in the Legal Department. If you don't have any friends in the Legal Department, you should consider making some; they're generally decent company, and they always buy lunch.



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OUR COMMITMENT TO OUR SHAREHOLDERS

Each of us is a guardian of the trust that our shareholders — the Company's owners — have placed in Jack in the Box Inc. by investing in the company. We have a responsibility to fulfill our duties to our shareholders lawfully and ethically. In every action we take on behalf of the Company, we should ask ourselves whether our actions are ones that we would be comfortable with as Company shareholders (which many of us are).

CREATING ACCURATE BUSINESS RECORDS

Our shareholders and potential investors depend upon the quality of the information we provide them about the Company. They also depend on us to make business decisions based upon reliable information. The integrity of our financial controls and reporting are therefore of the utmost importance (and when we say "utmost," you know we're serious).

For this reason, all of our financial books, records and accounts must completely and accurately reflect transactions and events, and conform to legal requirements and to our own system of internal controls. You must never do anything that could influence, mislead or manipulate our auditors, whether internal or external, in order to cause our financial statements to be misleading in any way.

You must also never make false claims on an expense report or time sheet, falsify quality or safety results, record false sales or record them early, intentionally understate or overstate known assets or liabilities, maintain undisclosed or unreported "off the book" assets, or defer recording items that should be expensed. And you must never create documents or make entries that intentionally hide or disguise the true nature of any transaction.

Each of us has a duty to take all reasonable and necessary steps within our areas of responsibility to provide full, fair, accurate, timely and understandable disclosure reports and documents where the contents will be relied upon as part of submissions the Company or any of its subsidiaries or affiliates make to any federal, state, or local regulator, or will be communicated to our stockholders or the general public.

There were a lot of big, scary-sounding, even legal-sounding words in this discussion. The drafters of your Integrity Playbook even understand most of them. But the bottom-line is simple. Be honest and tell the truth. Easy peasy!

Q&A

Why is our Corporate Records Policy Important?

It's important to know what to keep and what not to keep. While we must keep certain documents and information for legal, tax and business reasons, keeping unnecessary documents makes it difficult to find what we need and can be costly. For this reason, you should only hold onto documents and information that you're required to keep. You can find more details about this in the Company's Records Retention Policy on the Hub.

Q&A

Someone at CSC did something the other day that really set me off. I don't want to call the jerk, because phone conversations of this sort make me uncomfortable. Can I send him an e-mail to get things off my chest?

Email is a business tool, and should be used with great care. An email is not appropriate in your situation. It will almost certainly escalate the issue. If you have a concern about the actions of a co-worker, you should speak with him directly about it. If you don't believe this will effectively address the situation, speak with your supervisor or contact HR.

GUIDELINES REGARDING BUSINESS COMMUNICATION

Don't Be Sloppy or Careless in Creating Business Communications

Always be clear, concise (unless you're our current Chief Risk Officer and Ethics Geek), truthful and accurate when preparing any record or business communication. And again, unless you're the writer of this tome, please avoid exaggeration and colorful language, and even if you are the writer of this tome, you and everyone else must avoid guesswork, legal conclusions and derogatory characterizations of people or their motives.

Be Particularly Careful with Email

Email seems as casual as everyday conversation, yet once created, it can live forever. Also, once you hit the "Send" button, you lose complete control over where that email goes. You should exercise the same thoughtfulness and care in creating and sending an email as you would any document that could become public.

Assume Every Document You Create May Be Made Public

In our increasingly connected, wired, and lawsuit-crazy world, any writing or record you create – including texts, IMs, emails and even voicemails (which get transcribed!) – may be publicly disclosed as a result of litigation, government investigations, or something as increasingly commonplace as leaks (which occur even outside of Washington, DC). In fact, when creating documents, you should write them as though you expect them to become public.

RETENTION OF BUSINESS RECORDS

Several legal and regulatory requirements govern how long the Company is expected or required to retain its business records. In order to meet these requirements, the Company has developed a comprehensive record retention schedule that covers Company records. Each of us is expected to understand and comply with the record retention schedule.

Be sure to note, however, that you should never destroy documents in response to or in anticipation of an investigation, audit or lawsuit. This rule applies even if our record retention schedule would otherwise call for the destruction of such documents.

If you have any questions about any of this, be sure to speak with our head of Records Management, who is a veritable font of valuable information about this important topic, and who is, in general, simply a delightful person to talk to.

GOVERNMENT INQUIRIES AND INVESTIGATIONS

If you receive a government request for Company information, forward it immediately to the Legal Department. Franchisees are advised to consult with their own counsel under these circumstances. All information provided in response to government requests for information must, of course, be truthful, complete and accurate. You must never mislead an investigator, and never alter or destroy documents or records (including electronic records such as texts and email) in responding to an investigation. People go to jail for such things, including really famous people in the worlds of finance and entertainment and politics who had awesome (meaning really pricey) lawyers defending them. (And if really famous people with really pricey lawyers go to jail for such things, you can be sure that you, too, could go to jail for such things, even if you have a really pricey lawyer. So, if not doing this because it's wrong doesn't slow you down (which would disappoint your Chief Ethics Geek and your colleagues), don't do this because rumor has it that prison isn't a whole lot of fun.)

PROTECTING OUR ASSETS

Each of us is responsible for protecting and not misusing Company assets. Such assets include obvious things like cash, equipment, inventory and supplies. But they also include our computers, software, telephones, and networks. You should only use Company computers and other electronic devices, software, telephones and networks to conduct Company business in accordance with Company policy. In no event should you use them to send, receive or access materials that others would find offensive (you know what we mean), or to download or copy software, media or other legally protected works without permission.

The Company has the ability and reserves the right to review Internet searches and email communications that are carried out on company equipment. So be sure to exercise appropriate judgment in your use of these tools. Finally, our computers, software, telephones, mobile devices, and network should be used in such a way that the security and integrity of the network is protected at all times. In a nutshell, always practice safe computing. For more information, please refer to Company policies, including the IT Policy Summary and Mobile Device Policy.

Needless to say, if you steal, embezzle or misappropriate Company property, you can be fined, arrested, or both. You can also be fired. Also, we'll say terrible (true) things about you, and your awful legend will live on throughout the Company for generations. So that will happen too. Don't let that happen.

Q&A

May I access the Internet for personal use from Company computers?

Occasional or incidental personal use of the Company's Internet and email system is permitted on personal time, as long as it doesn't interfere with your responsibilities, doesn't involve illegal or inappropriate activities (such as accessing pornography), and doesn't put our systems at risk from viruses or other issues. The Company has a responsibility to ensure that our systems are being used appropriately, and has both the right and the ability to review all emails and Internet searches carried out on its computers. So, if you use our computers for personal use, be sure to exercise good judgment, and recognize that authorized Company personnel may view your communications at any time. We mean it – don't creep us out.

I volunteer for a local cancer awareness and prevention charity. Can I use company equipment to copy fliers for a fundraiser?

We appreciate the fact that you're involved in your community during your personal time. This community spirit is one of our Company's great strengths. However, using Company assets for personal projects – even great ones like this – is generally not permitted. You must speak with your supervisor first and receive his/her approval to use Company resources in this manner. We're not being jerks – it's just that these resources belong to our shareholders, not to us, and we need to be good stewards of the trust the shareholders place in us.

Q&A

What do I do if I find confidential Jack in the Box documents in a copier or conference room?

Give them to your supervisor or the Legal Department for handling. Don't throw them away and don't leave them in the conference room.

PROTECTING CONFIDENTIAL AND PROPRIETARY INFORMATION

Information is one of our most valuable assets — one that we all have a responsibility to manage and protect. If you have access to proprietary information about the Company, such as sales and profit figures, new product or marketing plans, research and development ideas or information, and information about potential new markets, acquisitions, divestitures, business partners, franchisees, and investments, or personal information of guests or employees, it's your responsibility to keep such information confidential.

You must never use any Company information for any purpose other than the performance of your duties. Note as well that your obligation to protect confidential Company information continues even after you're no longer an employee of the Company.



DISCLOSURE OF CONFIDENTIAL INFORMATION

Intentional Disclosure

You must never disclose any confidential information internally or externally unless:

- Doing so is a necessary part of conducting business on behalf of the Company;
- Disclosure is legally required, or
- Disclosure is made to government entities in response to a lawful request or demand, and is carried out in coordination with the Legal Department.

Even in these circumstances, such disclosure should only occur if appropriate steps are taken to protect and preserve the confidentiality of the information (such as through entry into nondisclosure or confidentiality agreements).

You must never disclose, either inside or outside the Company, any documents or other information labeled “Attorney-Client Privileged” or “Confidential Attorney Work Product” (and you must never disclose privileged or confidential attorney communications even if the communications are not specifically labelled as such) without the approval of the Legal Department. Lawyers get very fussy about such things, and you really don’t want to have to deal with a fussy lawyer. Just ask the wife of our Chief Legal Officer.

Inadvertent Disclosure

Sometimes, disclosure of confidential information can be unintentional. You have the responsibility to minimize risk of inadvertent disclosure. For example, don’t work on confidential or proprietary documents if people standing or sitting near you can easily see and read them. You should avoid discussing confidential Company information in public areas such as airplanes, elevators, or on mobile phones where you can be overheard. (We’ve all been exposed to those self-important blowhards who make it a point to speak loudly about business on his or her cellphone just to make sure that everyone within earshot knows how awesomely successful they supposedly are. Don’t be that self-important blow-hard.) And don’t even think about discussing confidential information on any type of social media, no matter how restricted you believe the “group” to be. For more information about this topic, please refer to the Company’s Social Media policy. Even if disclosure in such situations is inadvertent, carelessness with confidential Company information can result in disciplinary action, including possible termination of your employment.

Q&A

I have reason to believe that someone in my group is trading in the stock of a business partner based on information that is not public. What should I do?

Immediately notify the Legal Department. If you're uncomfortable doing so (our lawyers are very friendly and rarely bite, so you should not be uncomfortable with them), or if you prefer to remain anonymous, use our toll free Ethics Helpline at 1-888-613-JACK.

INSIDER TRADING

Our access to confidential and proprietary information also creates insider-trading risks. Specifically, it's against the law and against Company policy for anyone to buy or sell Jack in the Box Inc. stock (or the stock of any other publicly traded company) on the basis of information obtained through their employment with the Company and not publicly available to others. "Anyone" means you, your spouse, your best friend, your broker, your golfing buddies, your poker pals, your hair stylist, or anyone else you might intentionally or inadvertently tip off about non-public information relating to a publicly traded company. The type of information you should be particularly careful about is information that a reasonable investor would consider important in deciding whether to buy, sell or hold onto a stock. The legal term for this type of information is "material information." But any non-public information about the Company can create risk and should not be disclosed to others or be used as a basis for making investment decisions.

People pay large fines and can (and do) go to jail for insider trading. It's illegal and unethical and – if you're not already persuaded – it's really easy for federal regulators to detect and prosecute. Unless you look good in orange or stripes, you like really bland food that must be eaten with plastic utensils, and your preferred choice of window-treatments is metal bars, you'd be wise to steer clear of this sort of thing.

In all events, if at any time you're in possession of non-public information and are unsure whether or not it's material, please be sure to consult the Legal Department for guidance. For further information on this important topic, please refer to the Insider Trading Policy and Help document.

WHAT IS “MATERIAL” INFORMATION?

“Materiality” is a legal concept, but essentially, material information is the sort of information that a reasonable investor would be likely to consider important in making a decision to buy, sell or hold onto the stock of a public company. Types of information that could be considered “material” include (but are not limited to):

- Non-public information about sales, transactions, margins or earnings;
- News about acquisitions, divestitures or joint ventures;
- New products or concepts;
- Major personnel or management changes;
- Information concerning important litigation or investigations; and
- Changes in suppliers or product recalls.

This can be complex stuff, and getting this wrong carries significantly negative consequences, so if you have any questions whatsoever about whether information is material and can be shared with others, be sure to reach out to the Legal Department for guidance.



Q&A

I received a call from someone who said she was a college student doing research on Jack in the Box. She was interested in collecting information about sales, trends, transactions, development plans and similar things. A lot of this information relates to our strategic plan, which we’ve discussed publicly. Plus, most of the specific information is going to be shared in our quarterly press release or could be discussed in the webcast that follows the press release. Is it okay for me to provide this information? And one more thing – she offered me \$500 for my time in speaking with her. Does this make a difference?

Unless you’re specifically told otherwise, assume that all information you learn about the Company and its operations is confidential information that can’t be shared with “researchers” or “students” (or whatever they call themselves). There is a name for contacts of this nature. It’s called “phishing.” It involves people (who apparently can’t spell) trying to gain access to confidential company information so that they can trade on it or profit from it before the market has access to it. Providing information to people engaged in phishing can get you phired. In addition, the government has been known to prosecute people involved in phishing – both those seeking information and those providing it. So, depending on the circumstances, sharing such information could land you a stretch in the big house. Whether you’re offered money or not, don’t do it. If you receive solicitations of this kind, you should contact the Ethics Office.

Q&A

My brother-in-law has a business that would be a great supplier for Jack in the Box. How can I get him in the door?

You should avoid doing anything that creates the appearance of a conflict of interest, if not an actual conflict. In this case, you should introduce your brother-in-law to someone else at Jack in the Box who makes purchasing decisions, and remove yourself from the process entirely. You should also notify your supervisor.

CONFLICTS OF INTEREST

You must act honestly and ethically in the handling of actual or apparent conflicts between your personal interests and those of the Company. And you must take reasonable steps to avoid situations that may create an actual or potential conflict of interest, or which create the appearance of such a conflict.

WHAT IS A CONFLICT OF INTEREST?

A “conflict of interest” occurs when an employee’s own personal interests interfere or appear to interfere with the interests of the Company. You should never use or attempt to use your position at the Company to obtain any improper personal benefit for yourself, your family, or anyone else. In addition, you should avoid investments or other involvements that might impair your exercise of independent judgment on behalf of the Company.

Stated otherwise, you must not have direct or indirect interests in, or relationships with, any organization that could conceivably (a) hinder your objectivity, independence of judgment, or conduct in carrying out your responsibilities on behalf of the Company, or (b) embarrass the Company or otherwise reflect badly on it or the Jack in the Box brand because of the appearance of a conflict of interest. The appearance of a conflict can be as harmful as an actual conflict.

EXAMPLES OF POSSIBLE CONFLICTS OF INTEREST

Family Members and Personal Relationships

You must be sensitive to, and avoid both the reality and the appearance of conflicts of interest. For example, the following situations create concerns about fairness and objectivity:

- You, your family members or close personal friends own or have significant investments in:
 - Restaurants that compete with Jack in the Box;
 - Businesses that sell goods or services to Jack in the Box.

Family Members and Personal Relationships (cont.)

- You encourage our franchisees or companies that do business with Jack in the Box to buy products or services from you, your family members or close personal friends.

While it is not automatically prohibited for Jack in the Box to do business with your family members or close personal friends, if such a situation arises, you should remove yourself from the process as soon as you learn about it and disclose the circumstances to your supervisor.

Personal Investments

You should avoid investing in any company that competes with Jack in the Box, or in any company that does or seeks to do business with us. Relatively small investments or investments in funds that include such companies will generally not raise concerns.

Financial Obligations

You should not borrow money from or become indebted to any company or person doing or seeking to do business with Jack in the Box where doing so could create a risk, or even the appearance, of impropriety or lack of objectivity with respect to your or their dealings with the Company.

Officers and Directors of Public Companies

Company employees may not serve as officers or directors of public companies without first notifying and obtaining written permission from our CEO. Officers of Jack in the Box Inc. may not serve as a director of a public company without prior approval by the Jack in the Box Board of Directors or its Nominating and Governance Committee.

Q&A

This woman, Danette, who works in Supply Chain, also owns a prominent local hotel here in San Diego with some family members. I've heard she encourages suppliers and potential suppliers to stay in the hotel whenever they visit, even though she's the principal person who decides whether they will receive business from Jack in the Box, and if so, how much. This seems fishy to me, but I don't want to be unfair to her. How should I think about this situation?

Well, the fact that this seems fishy to you helps answer the question. We have no way of knowing whether the decision of a current or potential supplier to stay in Danette's hotel impacts her decisions about who gets to do business with Jack in the Box and on what terms, so I say we give her the benefit of the doubt. But the fact that it seems fishy suggests that whether Danette's actions are legitimate or not, they create the appearance of impropriety that really needs to be avoided. The truth is that we may never know whether Danette's actions are impacted by a supplier's decision to stay or not stay in the hotel; but other people doing business with us (including suppliers who don't stay in the hotel), will always wonder, and this alone will impact our reputation and that of the Jack in the Box brand.

Q&A

A supplier that I've worked closely with over the past few years came to me the other day with an exciting business proposition. He thinks it would be something that Jack in the Box might be interested in. But I think it might be a great personal opportunity for me, and it's probably too small an opportunity for Jack. Can I suggest to him that he consider working with me instead of Jack in the Box on this?

No – you learned about this opportunity through your position with the Company. Pursuing this personally is an improper use of a corporate opportunity and must be avoided.

My cousin and I are opening up a sushi bar ("Jack in the Bento Box.") Is this a conflict of interest?

You should speak to your supervisor about your plans (and hire a good trademark lawyer to help come up with a new name). Your involvement in the restaurant could create a conflict of interest.

CORPORATE OPPORTUNITIES

Each of us has the responsibility to advance the Company's business interests whenever the opportunity arises. Accordingly, you must not take for yourself (or give someone else) a business opportunity that you've discovered through your use of or access to corporate property, information or position, unless the Company has already been offered the opportunity and has turned it down. More generally, you must not use corporate property, information or position for personal gain. And you cannot compete against Jack in the Box.

EXAMPLES OF PROHIBITED USES OF CORPORATE OPPORTUNITIES

- Selling or sharing Company information to obtain an anticipated benefit;
- Converting a Company business opportunity for personal use (as an example, read the Q & A);
- Selling company property (such as antenna balls or old equipment);
- Acquiring real estate that you know is of interest to the Company;
- Using private information of the Company outside the Company;
- Using private information of the Company in connection with trading or dealing in commodities, stock or other securities;
- Using private information of the Company for publication or as the basis for material for publication in newspapers, magazines or books.

GIFTS, FAVORS AND ENTERTAINMENT (“BUSINESS COURTESIES”)

One of the trickier issues in assuring ethical relationships with business partners is the handling of gifts, favors and entertainment (“business courtesies”). Business courtesies can help build goodwill and working relationships. But they should not be used to gain an unfair advantage or to improperly influence business decisions. Business courtesies can create serious ethical risks. And even if ethical concerns are not well founded, gifts and entertainment can create the appearance of misconduct. Such perceptions alone, even if mistaken, can produce huge problems for you and for the Company.

What Are Business Courtesies?

You should think of business courtesies as anything of value that has the potential to cause business decisions to be made on grounds unrelated to their merits. In a purchasing situation, for example, this might be something that could cause someone to make a decision on a basis unrelated to price, quality or service—or that could create the appearance that the buying decision was made on such a basis. In a franchising situation, it might be something that would cause us to elect to enter into a twenty-year business relationship with someone for reasons unrelated to their qualifications to finance or operate Jack in the Box restaurants.

Receiving Business Courtesies

Each one of us must act in a fair and impartial manner in all business dealings — this means using our common sense in order to avoid even the perception that a business courtesy has influenced or may influence our business judgment.

Some Examples of Business Courtesies

A business courtesy may be tangible or intangible, and can include such items as:

- gifts, meals, drinks, entertainment (including tickets and passes);
- recreation (including rounds of golf and tennis court fees);
- door prizes;
- transportation;
- discounts;
- promotional items, or use of a donor’s time;
- materials;
- facilities or equipment.

And these are just examples. Anything of value can be considered a business courtesy.

GUIDELINES FOR DETERMINING WHETHER TO ACCEPT OR RETAIN A BUSINESS COURTESY

Subject to the limits discussed below, you may keep a business courtesy when acceptance of the courtesy doesn't create even the appearance of an improper attempt to influence business decisions.

ACCEPTABLE BUSINESS COURTESIES MAY INCLUDE THOSE THAT:

- Promote successful working relationships and goodwill with persons or firms with whom the Company maintains or may establish a business relationship. Such courtesies might include infrequent business meals and entertainment that are shared with the person who has offered to pay for the meals or entertainment (however, you should use good judgment and decline invitations for meals and entertainment that are inappropriately lavish or excessive); or
- Are for the payment of reasonable expenses primarily for and directly related to business purposes, such as seminars or conferences related to your responsibilities, and you have supervisor approval; or
- Conform to the reasonable and ethical practices of the marketplace, such as flowers, fruit baskets, and other modest presents, that commemorate a special occasion.

Although you may accept limited gifts and entertainment from business partners under the circumstances discussed above,

UNDER NO CIRCUMSTANCES SHOULD YOU:

- Receive cash or cash equivalents such as gift certificates or gift cards (the Company may specifically approve the acceptance of "coffee cards" or similar tokens of minor value for one-time events such as holiday gifts; such gifts are only permitted if they've been approved by the Ethics Office.)
- Receive business courtesies that would be illegal to accept;
- Ask someone to give you business courtesies;
- Accept business courtesies (regardless of value) as a condition for something in return. In other words, if the courtesy will either obligate or appear to obligate you to do or provide something in return, it is improper;
- Receive business courtesies that are or might be construed as a bribe or a payoff;
- Accept offensive or improper business courtesies;
- Accept something that would cause the giver to violate his or her own company's standards or policies;
- Accept offers of expense-paid trips for pleasure from persons or firms with whom the Company maintains or may establish a business relationship.

If the guidelines listed are met, and do not give rise to the appearance of impropriety, you're permitted to receive business courtesies that do not exceed \$150 in value (and do not exceed \$250 in value in any calendar year from the same company, regardless of whether different employees of the company provide the gifts or entertainment). If you receive an offer of gifts or entertainment in excess of these amounts you must secure approval in advance and in writing by the Corporate Officer in charge of your function.

If your responsibilities include selecting contractors or vendors, approving franchise or development agreements, influencing the placement of business, creating specifications that result in the placement of business, or participation in negotiating contracts, you must be particularly careful to avoid actions that create even the **appearance** of favoritism or unfair influence, or that may adversely affect the Company's reputation for impartiality and fair dealing. The best course in such instances is to refuse a courtesy when the Company is or soon will be involved in a negotiation with the party offering the courtesy, or under any circumstances that would create an impression that offering courtesies is the way to obtain business from the Company.

You should avoid a pattern of accepting frequent courtesies from the same persons or companies and you should refrain from accepting courtesies that you would not feel comfortable discussing with your supervisor or co-workers.

Q&A

One of our Franchise Business Consultants, Dagwood, recently was transferred to the San Francisco market from Tulsa. Needless to say, the cost of living in San Francisco is considerably greater than that of Tulsa. One of our more generous franchisees in the San Francisco market is renting a 3-bedroom apartment he owns in Pacific Heights (the most expensive neighborhood in the city) to Dagwood for \$500 per month – waaaaay below market (so far below market that we ran out of “a”s). Any issues here??

Raise your hands out there if you don't think accepting a hugely discounted apartment from a franchisee he's responsible for overseeing and potentially disciplining creates a real or potential ethical dilemma for Dagwood? (Put your hand down, Dagwood!)

Q&A

One of our key suppliers was given four tickets to see a World Series game. He knows we are about to award a big contract, and has offered to take me to the game if I give his company an inside line on the business. The tickets aren't costing him a thing. This shouldn't be a problem, right?

This is a problem, because he is only offering the tickets if you give him something in return — preferential treatment for the upcoming contract. And this explicitly violates Company policy. Even if this weren't the case, this could present a problem if the value of the tickets exceeds \$150.00, regardless of whether the person who invited you paid for them or not.

A franchisee with whom we are currently in discussions about entering into a Development Agreement for a new market, has invited my wife and me to spend the weekend with his wife and him in Vegas. We've known this couple for years, and are close. Any problem?

Possibly. If the franchisee is paying, this is likely a problem. If you were to pay for all your expenses, it might not be a problem. However, such a trip could also raise questions. For example, if you have any role in determining whether to approve the Development Agreement, such a trip could create the appearance of impropriety. This is tricky stuff, so be sure to consult with your supervisor or the Ethics Office on questions of this sort.

Giving Business Courtesies

- You may not give gifts or entertainment that would be unacceptable for you to receive under the guidelines and expectations discussed above.
- You may also not give any such gifts or entertainment — regardless of whether they may be permitted under our Playbook — if such gifts or entertainment would violate the policies of the recipient's employer.
- You should always use common sense in order to avoid even the appearance that any gift or entertainment — even gifts or entertainment that otherwise satisfy the terms of this Playbook — has influenced or is intended to influence the business judgment of the recipient.

Gifts that Violate our Guidelines

If you receive a gift that violates our guidelines, you're expected to notify the Ethics Office, and to return the gift with a polite letter explaining our gift policy. If the gift is perishable or is otherwise impractical to return, you should either arrange to distribute it to employees or donate it to charity, with a letter of explanation to the donor.

BRIBERY OF GOVERNMENT OFFICIALS

From time to time, the Company deals with government officials in the course of our business (for example, on issues relating to zoning, signage, inspections or the like). Bribery of government officials is illegal. Perhaps not surprisingly, it also violates company policy. Accordingly, neither you nor anyone acting on behalf of the Company may pay a bribe. (This is what you call a simple declarative sentence.) This prohibition includes offering or promising anything of value, either directly or indirectly, to any government employee in an attempt to improperly influence a decision or to gain a business advantage. (This is not what you call a simple, declarative sentence, but it is nevertheless important.) Violating this policy can result in termination of employment, prosecution, and possible time in the crowbar hotel.

INDIVIDUAL POLITICAL ACTIVITY

We respect your right to engage in political activities of your choosing. When you do so, however, you must be clear at all times that your views and actions are your own and not those of the Company. Also, you may not use Company funds or resources to support your personal choice of political parties, causes or candidates. If you're politically involved or expect to become involved in political activities, please consult our Political Contributions Policy for more information on this topic.





OUR COMMITMENT TO THE MARKETPLACE

Jack in the Box has a long history of succeeding through honest competition. But we don't believe in winning at all cost. We must do so honestly, ethically and with integrity. This means that we must never engage in manipulation, concealment, abuse of confidential or proprietary information, misrepresentation of material facts, or in any other unfair or illegal competitive practices. This applies whether we are dealing with customers, competitors, franchisees, suppliers, other business associates, or anyone else we encounter in the course of our work.

PURCHASING PRACTICES

We must always observe the highest standards of ethics, fairness and impartiality in our dealings with suppliers and outside contractors. Purchasing and contracting decisions must be based on legitimate, defined criteria, including quality, service levels and price, and not on the basis of personal relationships or on the receipt of gifts or entertainment from an actual or prospective supplier.

Suppliers and contractors have every right to expect us to honor the terms and conditions of contracts, to pay in a timely manner, and to protect the confidentiality of their proprietary information.

Q&A

I've got a friend – let's call him "Tristan" – who works in our Finance group. Tristan's been having some financial problems, and he's spoken to two or three banks about securing loans that will help him out of his current personal distress. The thing is, these same banks are looking to do business with Jack in the Box, and Tristan is the guy who decides whether they will get the business. This seems wrong to me. Am I missing something??

Oh, Tristan! This certainly looks bad. And while it's entirely possible that Tristan will not let his personal situation impact his selection of banks that the Company will retain, this situation creates the appearance of impropriety. Even without actual wrongdoing (putting the best possible spin on this situation), the appearance of impropriety will cast serious doubt on the validity and ethics of any decision that Tristan makes here. And for this reason alone, any honest, right-thinking person of integrity would not put himself or Jack in the Box in this situation. Tristan sounds like he's in over his head.

Q&A

The competing burger franchisee across the street told me that his franchisor's marketing folks have gone nuts and are trying to get him to sell 16oz. soft drinks for \$.59. He's worried about a crazy price war (me too) and asked me whether I'd agree not to price 16oz. drinks for below a dollar. This is pretty localized, small potatoes stuff, so I'm assuming it's okay, right?

Wrong! Where antitrust is concerned, all potatoes are big potatoes. What you just described is called price fixing. It's a felony under federal and most state laws. Jail time is almost assured if you're caught. Not really worth it over a 16oz. soda, right?

COMPETITION AND ANTITRUST

The Company believes in competing aggressively in the marketplace. But we understand that we must compete fairly, ethically, and in compliance with all applicable laws and regulations. These laws and regulations, which include the federal and state antitrust laws, are designed to guarantee fair and open competition in business.

Although these laws are lengthy and complex, there are a handful of key things each of us needs to understand:

- It's against the law to share information or enter into formal or informal agreements with competitors or potential competitors on issues relating to price, terms of sale, distribution, or allocation of territories, products, customers, employees or suppliers.
- You should therefore never engage in any discussions, agreements or understandings with competitors or potential competitors that could be viewed as an effort to (i) fix, stabilize or control prices; (ii) allocate products, markets or territories; (iii) boycott certain suppliers; or (iv) refrain from the sale of any product.
- A good rule of thumb is to ask yourself whether what you're sharing, discussing or agreeing to with a competitor is the sort of thing you'd normally consider discussing with someone whose goals and objectives revolve around putting you out of business. If the answer is no, avoid the discussion.
- If you are unsure, err on the side of not having the discussion. If you're still not sure, ask the Legal Department.

The penalties for getting this wrong are quite serious, and include hefty fines, brutal monetary damages, and time in the slammer. So, again, try really hard to make sure you don't get this wrong. Failure to comply with the antitrust laws will also result in disciplinary action, up to and including being promoted to customer (i.e., getting canned).

COMPETITIVE INTELLIGENCE

In the normal course of business, it's not unusual to acquire information about competitors. Doing so is not, in itself, unethical. Indeed, it's a necessary part of a vibrant, competitive marketplace. Such information may be collected from a variety of legitimate sources, including published articles, market analyses, and other public reports and documents.

However, just as the antitrust laws prohibit us from gaining confidential or proprietary competitive information by being overly friendly with our competitors, other laws prohibit us from gaining such information by being overly unfriendly through, for example, lying or engaging in other improper activities. Accordingly, we won't tolerate theft or other misappropriation of proprietary information belonging to our competitors.

Such activity might include inducing disclosures from competitors' past or present employees or franchisees, lying about your own employment status with our Company to gain the confidence of competitors, or inducing our suppliers to provide confidential information they have received about competitors' strategies. In fact, even the innocent receipt of competitive information that you have reason to believe is intended by the competitor to be confidential can get you and the Company into trouble.

Q&A

I'm about to leave an industry trade association meeting in Chicago, but I just noticed that an attendee from McDonald's seems to have accidentally left some papers at the table where he was sitting. I may have taken a tiny peek at them, and it looks like they may be McDonald's business plans for the next two years. These documents have all sorts of "confidential" stamps on each page. This stuff is gold. I assume I can use it, right? I mean, the dope left it there.

Don't touch it. Don't look at it any further. Just walk the other way. If you know the information is confidential and that McDonald's would not intend for competitors to have access to it, you can get into trouble for reviewing it or taking it — even if the guy was careless in leaving the information lying around. One good rule of thumb is to ask yourself the question — if the roles were reversed, would I want this guy looking at our stuff? (And admit it — on at least one occasion, you've been the dope that left something lying around, right? We all have.) One more thing — if anyone ever tries to intentionally share such confidential or proprietary information about a competitor with you, tell the person that the discussion violates our Company policy and must stop immediately. And report the conversation to our Ethics Office.



OUR COMMITMENT TO OUR COMMUNITIES

CORPORATE STEWARDSHIP

In addition to the responsibilities that we owe to people who choose to do business with us, such as our shareholders, employees, guests, franchisees, and vendors, we also have responsibilities to people and communities who are impacted by our actions, whether they have chosen to do business with us or not. In fact, our responsibilities to our shareholders, employees, guests and business partners include the duty to be a good steward of our communities, our environment, and of people and things that are impacted by our business. Some people call this Corporate Social Responsibility, but we prefer a simpler term: Corporate Stewardship.

Making a commitment to our communities means more than being philanthropic (although philanthropy is a part of the overall conversation). But while philanthropy focuses on how we spend money, Corporate Stewardship focuses on how we make money. So, as a business that operates in communities throughout the United States, we have a duty to behave responsibly towards those communities. We also have a responsibility to manage our impacts in other communities that our business activities touch – for example farm communities throughout the United States from which we source our food.

We can and should (and will) pay more attention to these issues as our business grows. Just as our critical business decisions require us to assess the impact of those decisions on our obvious stakeholders (such as our guests, employees, franchisees, and shareholders), we also try include in our evaluation of these decisions the social, environmental, and animal welfare impacts of our activities.

This is challenging stuff, and it requires us to weigh a number of compelling interests in making business decisions that have varying and often conflicting impacts on our Company stakeholders. We might not make decisions that everyone agrees with all of the time – this would be an unrealistic goal. But we always work hard to try to make decisions that are consistent with our purpose, our guiding principles, and our culture. When we rely on these filters in making these decisions, we can be comfortable that we are doing the right thing.



ADDRESSING ETHICS AND COMPLIANCE ISSUES

COMPANY OPEN DOOR POLICY

We strive at all times to:

- Encourage employees to report actual or suspected violations of law or of the expectations defined in this Playbook, and other improper or unlawful conduct;
- Protect employees who report such actual or suspected violations, or other improper or unlawful conduct, from retribution or retaliation for having done so;
- Take all reasonable steps to respond to all reports of actual or suspected violations, or other improper or unlawful conduct; and
- Assure consistent enforcement of the expectations of this Playbook through discipline of anyone who violates it.

PROTECTING ANONYMITY

It is our policy to take reasonably practical steps to protect the identity or anonymity of any employee who makes a good faith report of an actual or suspected ethical violation or other improper or unlawful conduct. Though we encourage you to identify yourself, we will work to protect your anonymity to the extent practicable if you ask us to. Note that we will take appropriate action to discipline anyone who knowingly makes a false accusation or provides false information in connection with claimed ethics violations.

NON-RETALIATION

No employee may retaliate, directly or indirectly against another employee for reporting in good faith an actual or suspected ethical violation or any other improper or unlawful activity, or for assisting in an investigation of a report no matter whom the report concerns. Anyone who is found to have retaliated will be subject to disciplinary action, up to and including dismissal. This means anyone, including company officers.

RAISING QUESTIONS AND CONCERNS

REPORTING PROCEDURES

If a Jack in the Box employee has reason to believe that anyone acting on behalf of the Company has violated the expectations defined in this Playbook, behaved unethically, or exposed the Company to legal or reputational risks, it's his or her responsibility to promptly notify someone – generally the immediate supervisor. It is the responsibility of each supervisor who receives such information to promptly relay such information to the Ethics Office. We fully understand that, occasionally, reporting to your immediate supervisor would be difficult or inappropriate. In such cases, you should seek assistance from other members of management, the Ethics Office, or appropriate Human Resources personnel. If these are not comfortable alternatives, you can also use our Ethics Helpline.

OUR ETHICS HELPLINE

Although we believe strongly that the best way to address ethics and compliance concerns is with direct, face-to-face communications, typically with your immediate supervisor or other leader in your organization, we understand that in certain circumstances this simply may not be an option. Because of this, the Company has established an ethics help line that can be used to report actual or suspected ethical violations, other improper or unlawful conduct, or concerns regarding accounting, internal accounting controls or auditing matters. Helpline calls can but need not be made anonymously. The Helpline is for Company employees. Franchise employees should contact the appropriate manager in their organization.

What you can expect when you call the Helpline:

- You'll be asked to answer a few questions that are necessary to enable the Helpline staff to help you.
- If you don't want to identify yourself, that's okay. Helpline staff will take your information and give you a report number and a time to call back so you can get or give more information.
- The Helpline will be staffed during regular business hours, but you can call any time. After regular hours, you may leave a voice message. If you leave a message, you will be called back the next day.
- Every issue that is reported by an employee using the Ethics Helpline is investigated.

The Helpline is not intended to provide advice or guidance – you should seek that from your immediate supervisor, or through the Human Resources Department, the Legal Department or the Ethics Office.

WHERE YOU CAN REPORT

- Your manager
- His or her manager
- Human Resources
- The Ethics office
- To Sarah Super or Matt Hamilton



The Ethics Office,
Jack in the Box Inc.
9357 Spectrum Center Blvd
San Diego, CA 92123



ethics@jackinthebox.com



Ethics Helpline – (888) 613-JACK

All communications will be kept confidential to the extent consistent with legal and ethical requirements.

DISCIPLINE

Any ethical violations, or any other improper and unlawful conduct, will subject an employee to disciplinary action, which may include reprimand, demotion or dismissal, and even possibly legal action, depending on the circumstances. Disciplinary measures also can apply to anyone who directs, approves or condones violations, or has knowledge of such violations and doesn't move promptly to report and correct them. Further, disciplinary action may be taken against a violator's superiors, to the extent that the circumstances of the violation reflect inadequate supervision or lack of diligence.

WAIVER

Any employee who believes that a waiver of any provision of this Playbook is called for should contact the Ethics Office. You may not engage in any conduct inconsistent with this Playbook without receiving such a waiver in writing. It's not Company practice to grant waivers from the requirements of our Integrity Playbook. In the case of directors or executive officers, only the Board of Directors can approve such a waiver, and the company may be required by law to publicly disclose any such waiver.

CERTIFICATION

With the exception of restaurant employees, all employees are expected to read, understand and act in accordance with the letter and the spirit of the Playbook. All members of the Board of Directors and all full time employees (except non-management-level restaurant employees) shall certify that they have read the Integrity Playbook, that they understand it, and that they agree to abide by it. Periodic recertification is required of members of the Board of Directors and management, as designated by the Ethics Office. Failure to certify or recertify may result in discipline up to and including termination, as appropriate.