

## **RED ROBIN GOURMET BURGERS PROBLEM RESOLUTION POLICY AND WHISTLEBLOWER PROCEDURE**

### ***Open Door Policy***

Red Robin Gourmet Burgers (“Red Robin”) wishes to provide its Team Members a healthy, rewarding working environment in which they may excel. However, we recognize that problems and concerns for Team Members arise from time to time. At Red Robin, the door to your supervisor’s office is always open for you to express your complaints or concerns regarding things going on at work, to make suggestions, or simply to ask questions. If you do not feel that you can openly discuss your concerns with your immediate supervisor, you may contact your supervisor’s manager or anyone in management above your immediate supervisor. This process of resolving complaints or concerns in this manner is referred to below as the “Open Door Policy.”

If you do not wish to identify yourself when lodging a complaint or expressing your concerns, you may report your concerns **anonymously** through a toll-free telephone number that Red Robin has set up for that purpose, or you may submit them in writing to a post office box that Red Robin has also established for that purpose. However, we encourage you to identify yourself and provide your contact information so that we may get in touch with you if we need additional information and to tell you what has been done in response to your report.

### ***Job Concerns, Harassment, Discrimination***

If your complaint or concern relates to your employment, you may use the Open Door Policy, or you may contact the Team Member Resources Department directly at (303) 846-6047 or through the Company’s toll free number (888) 733-7621. Complaints that arise under Red Robin’s non-discrimination and anti-harassment policies will be handled under those policies.

### ***Violations of the Code of Ethics***

If you have a complaint or concern that others within Red Robin may have violated Red Robin’s Code of Ethics, you may report your complaint or concern using the Open Door Policy described above, or by contacting Red Robin’s Compliance Officer identified below directly by:

1. Calling toll free to (866) 646-7663;
2. Writing to: Compliance Officer, Red Robin Gourmet Burgers, P. O. Box 3047, Greenwood Village, CO 80155;
3. Sending an e-mail message to: Compliance Officer at [complianceofficer@redrobin.com](mailto:complianceofficer@redrobin.com); or
4. Sending a fax to: Compliance Officer at (720) 493-2760. If you do not wish to identify yourself, please use the Compliance Officer’s toll-free telephone

number provided above or use the Compliance Officer's post office box address provided above.

The person receiving your complaint or concern will respond to your complaint or concern within a week or as quickly thereafter as may be reasonable under the circumstances. If the response is not satisfactory to you, you may contact the supervisor of the person who furnished the response, or if the response was from the Compliance Officer, you may contact the Chairman of the Audit Committee.

### ***Whistleblower Procedure***

We encourage Team Members to report any suspected:

1. Instances of theft of Red Robin property, dishonesty (lying, for example) in dealing with shareholders or government officials, or corporate fraud.
2. Violations of Red Robin's accounting policies or accounting irregularities.
3. Any attempt to unlawfully influence Red Robin's auditors.
4. Any violation by any Team Member, officer or Director of Red Robin of Federal, state or local law, or the law of a foreign country in which we do business.
5. Any situation that creates a substantial danger to a Team Member's health or safety.

Any Team Member who wishes to report one of the foregoing concerns may contact the Compliance Officer identified below directly by:

- a. Calling toll free to (866) 646-7663;
- b. Writing to: Compliance Officer, Red Robin Gourmet Burgers, P. O. Box 3047, Greenwood Village, CO 80155;
- c. Sending an e-mail message to Compliance Officer at [complianceofficer@redrobin.com](mailto:complianceofficer@redrobin.com); or
- d. Sending a fax to: Compliance Officer at (720) 493-2760

If you do not wish to speak with the Compliance Officer regarding one of the foregoing complaints or concerns, then you may contact the Chairman of the Audit Committee of the Board of Directors directly by writing to: Chairman, Audit Committee, P. O. Box 3047, Greenwood Village, CO 80155.

Anonymous written or telephonic reports regarding the foregoing concerns will be accepted from Team Members. However, we encourage you to identify yourself and to provide your contact information so that we may contact you for further information and to tell you what has been done in response to your report. If you identify yourself and provide information as to how we may contact you, then you will receive a reply to your report within a week or as soon thereafter as practicable.

### ***Confidentiality***

Your complaint or concern will be kept confidential in so far as it is practicable to do so and still conduct an appropriate investigation into your complaint or concern. What does it mean that we will keep your complaint confidential? We will reveal your name and your complaint only to those persons who need to know it in order to investigate your complaint and resolve your concern, and then only to the extent that they need to know.

### ***Retaliation Prohibited***

No one in Red Robin may retaliate against you for reporting in good faith a complaint or concern that someone has violated Red Robin's Code of Ethics. "Retaliate" means taking an action that adversely affects you when that action is directly related to the facts you disclose in your report. That usually means taking an action that adversely affects the terms or conditions of your employment, which may include a demotion in position, or a reduction in pay or benefit. In addition, no one may retaliate against you because you refuse to carry out an order or directive that, in fact, constitutes corporate fraud or violates any Federal, state or local law. Red Robin will take action against those persons who may attempt to retaliate against you. Anyone who attempts to retaliate against you may also be subject to criminal penalties.

### ***Contacts***

Compliance Officer:

Annita M. Menogan  
Chief Legal Officer  
Red Robin Gourmet Burgers  
6312 S. Fiddler's Green Circle #200 N  
Greenwood Village, CO 80111

Or

Compliance Officer  
P. O. Box 3047  
Greenwood Village, CO 80155  
Telephone: (866) 646-7663  
Facsimile: (720) 493.2758  
E-mail:  
complianceofficer@redrobin.com

Chairman of Audit Committee:

Chairman  
Audit Committee  
P. O. Box 3047  
Greenwood Village, CO 80155

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Team Member Resources:

Wes Garnett– VP Team Member Resources  
Red Robin Gourmet Burgers  
6312 S. Fiddler’s Green Circle #200 N  
Greenwood Village, CO 80111  
Telephone: (303) 846-6047  
Or Toll-free: (888) 733-7621  
Facsimile: (720) 493-2770  
E-mail: [wgarnett@redrobin.com](mailto:wgarnett@redrobin.com)