

trust

What we
count on
to give all
of us a
chance to

quality love where
we work.

safety Respect
follows us no

care matter what
hall we walk

pride down or who
we are in the

respect company. We
trust others

expectations to treat us
with courtesy.

improvement Honesty
is the hall-

teamwork mark with
which we

ethics measure
ourselves.

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Purpose

JACK IN THE BOX has developed an Ethics Code of Conduct, called “TRUST”. It’s a commitment that all our employees make to each other – a commitment to treat each other fairly, honestly and with care & respect. Many JIB franchise operators have voluntarily adopted this program and are fully committed to treating their employees with fairness, honesty, and care and respect. Throughout this booklet, whenever the term “employee” or “JIB employee” is used, it applies not only to JIB corporate employees, but also to those JIB franchise employees whose employer has adopted this program. Likewise, the terms “JIB” and “Company” apply not only to Jack in the Box Inc., but also to those franchise owners and operators who have adopted this program.

The concept of “ethical behavior” is hard to define. But, all of us know it when we see it, and we know it when we don’t. We’d all agree that ethical behavior is fair, honest, proper, legal and demonstrates respect for others. In other words, ethical behavior means doing “what’s right.” But, some issues aren’t simply black or white, so figuring out what’s right can take a lot of thought.

Policy

“TRUST” spells out for ALL employees – from every board member to the newest hire – what the “right thing” is in several situations. It assists employees to make ethical decisions in such areas as:

- food safety
- guest services
- personal illness or injury
- conflict of interest
- safety

Ethical decisions early on can prevent minor concerns from becoming big problems. Doing the right thing reduces the risk of ethical mistakes and makes your job and everyone else’s job more secure.

Whenever an employee is facing a tough decision in an area that has not been covered in “TRUST”, the Ethics Helpline can get the answers you need (refer to the Ethics Helpline section).

The Jack in the Box Board of Directors, corporate officers, and franchise operators are committed to every aspect of “TRUST”. Management has pledged to maintain the same high standards of ethical behavior and conduct their jobs with integrity.

Your employer wants every decision to be one that the employee can be proud of, feel good about and perceive as fair, honest and legal.

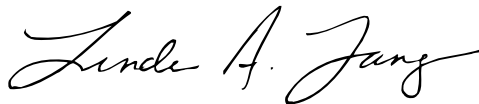
message from management

We value ethical behavior. All of our company values are about doing the right thing. Our values are all about the trust each of us has in our guests, our vendors, our communities, ourselves and even in our competitors. They are about the trust those folks place in us, individually and as a company, to do the right thing. We, the Board of Directors, the officers, and employees of Jack in the Box, along with our franchise operators, are all pledging to maintain the high standards of ethical behavior by doing our jobs with integrity.

Things are happening fast at Jack in the Box. With growth, more pressure is put on us all to do more; sometimes to do more with less, and to do more in less time. We are very sensitive to that and are aware that those pressures can tempt anyone to

cut corners or make decisions they would not otherwise make.

We know that trust has to be earned. That is why Jack's Ethics Program has been established to help us deal with those difficult decisions that are certainly going to confront us. The primary function of Jack's Ethics Program is to help all of us make the right decisions on how to behave ethically. This booklet is intended to be a guide on many of the issues we face. We want everyone to be comfortable with the practice of bringing issues to the attention of their supervisors, including us. It is our assurance to all of you that when you utilize the Program, you will do so with no threat of retribution from anyone else in the company. Together, we will maintain the highest business ethical standards, which have become our reputation.



Linda A Lang
Chief Executive Officer &
Chairman of the Board



Lawrence E. Schauf
Executive Vice President &
Ethics Compliance Officer

jack in the box ethics policy

General Standards and Purpose of Ethical Conduct

Jack in the Box (JIB) has a corporate responsibility to our guests, shareholders, the community, and ourselves. It is in the spirit of that responsibility that this Code of Conduct (Code) is set forth. It is the intent of the Directors and Officers of JIB that this Code applies equally to the Board of Directors, officers, and employees of JIB. It is also the intent of franchise operators who have voluntarily adopted this program that this Code applies equally to the franchise operator and all of his or her employees. No waiver of this Code or any part thereof for any Director, officer, or employee shall be permitted. Every individual is expected to conduct our business in compliance with all laws and regulations while maintaining the highest ethical standards.

This Code is authorized by the Board of Directors and the Chief Executive Officer (CEO) of JIB, along with its franchise operators, and requires the disclosure of any circumstance that may violate JIB policy. It establishes that every JIB employee must comply with the letter and spirit of this Code and other policies and procedures of JIB. It further establishes the responsibility of every JIB employee to report any violation, or suspected violation, of this Code or any other

JIB policy, to one's management or to the Ethics Helpline.

Conflicts of Interest

Conflicts of interest arise when there is opportunity for, or appearance of, personal gain apart from the normal rewards of employment. To avoid a conflict of interest, or the appearance of a conflict of interest, the following guidelines should be kept in mind:

1. The use of JIB funds or resources to support or influence a political initiative or referendum without proper authorization or to support a political party or candidate is prohibited.
2. Any financial transaction, service or other arrangement that places personal interests and those of JIB in opposition with each other must be avoided.
3. Anyone who buys or sells goods or services, or who influences such buying and selling in any way, must maintain the highest standards of ethical conduct. Any information that is proprietary either to JIB or a supplier carries an obligation to assure confidentiality.
4. All employees, management, and board members must avoid any activity, investment, interest or association which

compromises, or which might appear to compromise, the independent exercise of judgment and the performance of work in the best interests of JIB, its shareholders, and the public.

5. Board members, employees, and members of their immediate families shall not knowingly have any direct or indirect financial interest in:

- a. any franchise or franchisee of Jack in the Box, Qdoba, JBX Grill or QuickStuff,
- b. any transaction, including any company loan, or guarantees of obligations, to which Jack in the Box is a party (other than as a retail customer, in performing their duties as an employee or Board member, or as a participant in JIB benefit programs),
- c. any transaction with a corporation, partnership, or other entity, with which JIB is doing business (other than as a retail customer or as an investor in publicly traded securities),
- d. property which JIB is acquiring.

Corporate Opportunities

Employees, officers and directors are prohibited from:

- (a) taking for themselves opportunities that are discovered through the use of corporate property, information, or position;

- (b) using corporate property, information, or position for personal gain; and

- (c) competing with Jack in the Box.

Employees, officers and directors owe a duty to JIB to advance the legitimate interests of Jack in the Box when the opportunity to do so arises.

Gifts, gratuities, donations, and entertainment can be a legitimate business activity. Soliciting gifts or donations from any vendor, customer, government official or employee, or offering gifts to any vendor, customer, government official or employee, as a condition of doing business, is prohibited. Any employee receiving a gift, gratuity, or entertainment valued in excess of \$150.00 must report in writing, to his or her supervisor, the nature and value of such gift, gratuity, or entertainment.

Acceptance of a cash gift is never appropriate at any time.

Confidentiality

Employees, officers and directors shall maintain the confidentiality of information entrusted to them by JIB or its vendors and customers, except when disclosure is authorized or legally required. Confidential information includes all non-public information that might be of use to competitors, or harmful to JIB or its vendors or customers, if disclosed.

Fair Dealing

All employees, officers and directors of JIB must endeavor to deal fairly with JIB's customers, suppliers, competitors, and with each other. No one shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

It is a violation of this Code to:

- (a) knowingly sign documents that are inaccurate, untrue or are in violation of JIB policies and procedures; or to
- (b) conceal information from, or give misleading information to, anyone authorized to receive that information by management.

Protection of Company Assets

All employees, officers and directors of JIB shall protect the assets of JIB and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. All company assets shall be used only for legitimate and allowed purposes.

Compliance with Laws, Rules and Regulations

All employees, officers and directors shall conduct themselves in compliance with laws,

rules and regulations, including insider trading laws. Insider trading is both unethical and illegal and will not be tolerated.

Reporting of Illegal or Unethical Behavior

This Code does not include descriptions of every type of unethical or illegal conduct or conflicts of interest. The perception of a wrongdoing may be as great a concern as an actual wrongdoing. Difficult questions of judgment are involved; therefore, it is critical that each person exercise judgment in recognizing and resolving potential ethical, legal and/or conflict of interest issues before engaging in situations where such issues may arise. Violations of this Code, observations of illegal or unethical practices, or conflicts of interest, should be reported to one's supervisor or the Ethics Helpline operated by the JIB Ethics Program Director.

No individual who reports any such violation in good faith shall be subject to retaliation or retribution of any kind from anyone in the company.

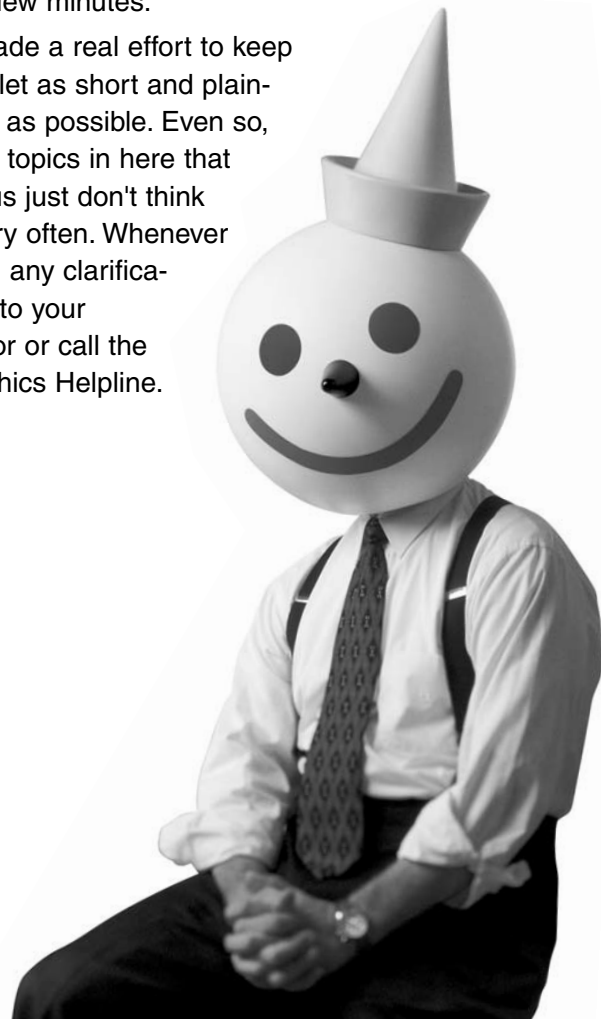
Any refusal of an employee to cooperate with an internal investigation into ethical or legal violations shall be subject to disciplinary action, up to and including termination.

Jack's comment

Whew! That's a bigger mouthful than one of my Jumbo Jacks!! What you have just read is the formal ethics policy of our company. The lawyers tell me that all those words are necessary, so there it is, in all of its glory. And it is important. It's important that you read it; it's important that you understand it; and it's important that you get more explanation on those parts you don't understand. A lot of that--more explanation of those parts that tend to be more complicated--is what follows in this booklet. We're going to talk more about legal issues, but we're also going to talk about other responsibilities that might not be real clear in that formal ethics policy. Some of those responsibilities have to do with the workplace and our relationships with each other. Things like food safety, personal safety, sexual harassment, discrimination, and how we treat our customers. Others have to do with stuff like "anti-trust", insider trading, copyrights and computer software, and environmental protection.

It's also important to remember that this booklet does not contain all of the policies and procedures of our company. As other concerns and questions come up, please remember to check with your supervisor for guidance. Jack's Ethics Helpline is also available for you to call, but more about that in a few minutes.

We've made a real effort to keep this booklet as short and plain-speaking as possible. Even so, there are topics in here that most of us just don't think about very often. Whenever you need any clarification, talk to your supervisor or call the Jack's Ethics Helpline.



about Jack's ethics program

We know that all of us want to always do the right thing. Sometimes, though, it's tough to know just what the right thing is. The Ethics Program can help. Here's a checklist to ask yourself whenever you are confronted with a difficult choice. If you can answer "yes" to all of these questions, your choice is probably the right one. If your answer is "no" or "I don't know" to any one of these questions, then you should seek guidance from your supervisor or from Jack's Ethics Helpline before making your decision.

1. Will my decision be legal?
2. Will my decision be fair and honest?
3. Will others view my decision to be fair and honest?
4. Will I feel good about myself afterwards?
5. Will my decision comply with the policies and procedures of my company?



6. Have I avoided even the appearance of impropriety?

If you aren't sure about a "yes" answer to any of those questions, the Ethics Program has established a couple of ways you can get help. The first way, of course, is to talk to your supervisor.

He or she will assist you in thinking through the choices to help you come up with the right thing to do.

If for any reason, though, your supervisor cannot help you, or you do not want to discuss it with your supervisor, you may call Jack's Ethics Helpline, by calling, toll free, 1-888-613-JACK. We will take your call and get

enough information from you to help you resolve the issue.

The goal of the Ethics Program is to reduce the chances of ethical mistakes, without fear of retribution. Whenever you have a question, concern, complaint, or

problem, we want to find out about that as early as possible. That helps the company prevent or minimize a potential mistake. It also helps you and every employee in our company. By reducing the risk of making ethical mistakes, your job and the job of everyone else is made more secure.

This Ethics Program is here to provide you every support possible in helping you to make the best choices possible, and to help resolve situations before they become major problems. Working together, we will maintain our ethical reputation and ensure our mutual success.

our guests trust us to...

... exceed their expectations.

That's more than a vision, more than a motto. It's our way of doing business! The highest trust our guests place in us is to provide them with safe food.

Food Safety

To meet this trust, the following guidelines must be observed at all times:

- 1.** Learn and follow food safety practices and procedures.
 - a. Recognize improper food safety procedures and correct yourself and your co-workers. Don't cut corners or allow others to take short-cuts, even when at your busiest.
 - b. Support the food safety programs as issued by the Corporate Support Center.

These programs have proven themselves to be highly effective. As much as anything else, the food safety programs not only protect our guests, they protect our company and our jobs.

- 2.** Use only approved products received from approved vendors.
 - a. Our distributors have met strin-

gent qualifications to assure only the best and safest products for our guests.

- 3.** Deliver safe food to our guests.
 - a. If you doubt its safety or cleanliness, throw it away and re-fill the order.
- 4.** Do not hide personal illness or injury.
 - a. Report every illness and injury, no matter how minor, to your supervisor immediately.
- 5.** Be forthcoming and truthful with Health Department officials.
 - a. Those officials are there to help all of us. Help them to help us.
- 6.** Complete food safety documents accurately and properly.
 - a. Good record-keeping helps us monitor the effectiveness of our food safety programs and to continuously improve those programs.
 - b. "Pencil-whipping" these forms is clearly unethical behavior.



... treat our guests right

Beyond assuring the safety and quality of our food, it is important to treat the guest right. What does that look like?

1. Our guest is treated with courtesy and respect.
 - a. Every guest must be greeted promptly.
 - b. Even when a guest is being difficult, we maintain our courtesy to them.
 - c. Personal affairs should never be discussed with or in the presence of a guest.
2. Our guest is treated fairly and honestly.
 - a. We deliver the guest's order accurately.
 - b. We exercise care in handling the guest's food and money.
3. We are responsive to our guest's needs and concerns.
 - a. We listen carefully and completely to what the guest is saying and satisfy their needs to the best of our ability.
4. Our products and services are available equally to all our guests.
 - a. Discrimination against any guest is absolutely prohibited.
5. We provide our guests with a safe, clean, attractive, and inviting environment.
 - a. Everything in our restaurants and the grounds surrounding them will be clean, neat, and orderly at all times.
6. We deliver what is advertised.
 - a. This applies every bit as much to service as it does product.

our vendors trust us to...

... maintain mutually beneficial relationships.

Dependable and loyal vendors are critical to our business. Vendors are not only those persons and firms from whom we buy product, but also include suppliers, distributors, and contractors. While we are their customers, they are also our customers. Our objective with our vendors should always be to nurture a long-lasting and mutually beneficial relationship.

For those of us who purchase goods and/or services for Jack in the Box, or who might have some influence on those purchases, the following guidelines should be observed:

1. All vendors should be treated fairly.
 - a. All purchasing decisions are based only on objective criteria such as quality, price, availability, and dependability of service.
2. All vendors' proprietary information must be held in confidence.
 - a. It is not unusual that we will gain access to confidential information from vendors, such as pricing policies. We owe a duty to our vendors not to reveal that information to
- anyone other than those who have a genuine need to know.
3. Deceptive trading practices are prohibited with our vendors.
 - a. If there are any errors or misunderstandings with our vendor, immediate steps must be taken to correct those errors or misunderstandings.
4. No personal purchases are made from our vendors.
 - a. Unless a vendor makes it a practice to provide discounts and other services to all of our employees, it is improper for any one individual to take personal advantage of such.
5. Except for the allowable limitations stated in the JIB Ethics Policy no gifts are accepted or solicited from a vendor.
 - a. This includes anything that might be perceived as tending to influence our purchasing decision, even if the item would not, in fact, influence our decision.

our competitors trust us to...

... compete fairly.

All's fair in love and war, right? No. Not when the "war" is a commercial one. In the United States, all companies owe to all other companies certain duties to compete fairly and to avoid actions that are "unfair trade practices" under the law. Jack in the Box competes aggressively, but at all times fairly. Here's what we do to accomplish that:

1. We never make false or deceptive statements about any of our competitors' products, their financial status, or how they conduct their business.
2. We never say anything about a competitor with the intent to damage their business.
3. We never engage in scare tactics with our competitors or attempt to coerce them in any way.

4. We never unfairly interfere with any contracts our competitors have with their vendors, suppliers, distributors, or contractors.
5. We never engage in or cooperate in any false or misleading advertising.
6. We never use our relationships with mutual vendors of our competitors to take unfair advantage of a competitor.
7. We never misrepresent ourselves or our employment with JIB to gain access to confidential information of a competitor.

There are other legal issues that must be observed that impact our obligations to our competitors, and those are discussed in the next section.

our community trusts us to...

... be a good citizen.

So what's a community, anyway? Our community is more than the neighborhood where we live. Our community includes the rest of the town, the county, the state, even the whole country. That is certainly true for Jack in the Box. Our company has an obligation to be a good citizen. We do business in many states and our primary obligation to the community is to know and obey the laws wherever we may be. Just like you and me.

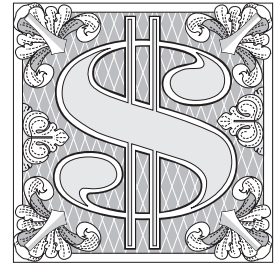
In order to maintain our good corporate citizenship there are many rules and regulations that we must all be aware of and obey. Here are the ones we want to be particularly aware of:

Anti-trust

"Anti-trust" is a term used to describe various laws that assure our markets are free and that protect businesses and individuals from unfair or predatory trade practices. Our state and federal governments are very diligent in the enforcement of anti-trust laws. These laws make it illegal for anyone or any company to engage in any activity that restrains free trade. One of the more common things that would be in violation of anti-trust laws is

unfair competition, already discussed in the previous section. Other activities, though, are or can be perceived to be anti-trust violations. Here are some examples:

1. Price-fixing is any discussion with a competitor or its employees about fixing prices at a certain level so that competition is impaired. No actual agreement is necessary to be in violation of the law!



2. To bribe or take a bribe, which may include money, gifts, favors or promises of any value as a means of influencing someone to do something in violation of legal or ethical obligations.
3. Allocation of markets with a competitor to give or receive an unfair competitive advantage.

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4. Conditional purchases, which means requiring a vendor or supplier to purchase our products as a condition of buying from that vendor or supplier.
 5. Predatory behavior is any unreasonable interference with a competitor's business in an attempt to gain a share of the market.

Of course, there are many other possibilities that can cause an anti-trust violation. If you have any concern or doubt as to whether a particular action might be in violation of anti-trust laws, or even appears to be in violation, call Jack's Ethics Helpline.

Copyrights

When some person or company creates an original work of authorship, the law gives that person or company the exclusive right to copy and distribute that work (a "copyright"). Here are a few examples of what is protected by the copyright law:

1. Computer software cannot be installed on more than one computer system unless the license agreement specifically allows such installation.

2. Newspaper and magazine articles cannot be copied. However, our company has contracted for rights to copy many publications.

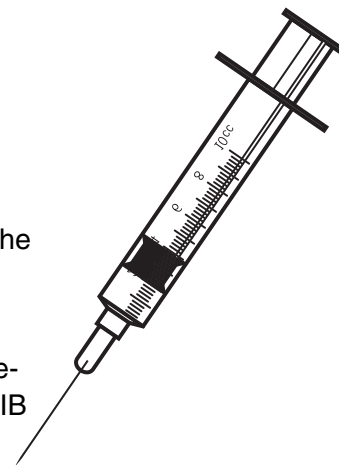
If you have any concern or doubt as to whether a particular action might be in violation of copyright laws, call Jack's Ethics Helpline.

Drug Use and Possession or Dealing

It is against the law or against Jack in the Box policy to:

1. Sell, purchase, possess or use illegal drugs while on the job or on JIB property.
2. Sell, purchase, possess or consume alcohol while on or using JIB property.
3. Be under the influence of alcohol or illegal drugs on the job or on JIB property.

Illegal drugs include narcotics, sedatives, depressants, stimulants, hallucinogens, or other substances whose possession, use, purchase, or distribution is prohibited or restricted by law. However, the proper use



of prescription medication under the supervision of a physician is permitted.

Environmental Protection

Jack in the Box is committed to exercise all reasonable care to enhance and preserve our environment. In this respect JIB shall:

1. Properly dispose of all liquid and solid waste and trash generated by us at any of our facilities.
2. Preserve our natural resources and comply with all applicable environmental laws.



Equal Employment Opportunity

It is unlawful or against Jack in the Box policy to discriminate in the employment of any person on account of characteristics such as race, color, religion, sex, pregnancy, national origin, ancestry, age, marital status, disability, veterans' status

or sexual orientation. The same rule applies in matters of promotions and discipline. If you have any concern or doubt as to whether a particular action might be in violation of equal employment opportunity laws, call Jack's Ethics Helpline.

Insider Trading

Employees often have information about Jack in the Box that is not generally known to the investing public, and which can impact the value of our stock.

1. To protect our shareholders, JIB prohibits any employee or board member from buying or selling our company stock while in possession of material, non-public information about JIB, or from disclosing such information to another person (including relatives and friends) except when such disclosure is necessary to fulfill a business objective of JIB.
2. Board members and other employees with such inside information are generally permitted to engage in transactions involving JIB securities during a "window" period, which follows the public release of JIB

quarterly financial results, unless they have material, non-public information at that time.

3. Employees who trade JIB securities or exercise stock options based on material information that has not been made public may be in violation of insider trading laws. Similarly, an employee may incur personal liability if he or she provides such inside information to other persons who then trade JIB securities.

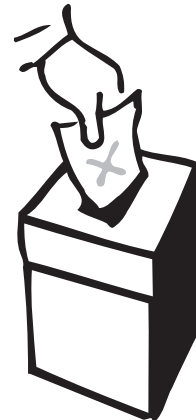


4. The penalties for insider trading are serious, both for the company and for the individual. There can be both civil and criminal penalties, which may include payment of fines and imprisonment.
5. Any employee who feels he or she may have insider information should call Jack's Ethics Helpline prior to trading JIB securities.

Political Influence

There are proper and legal ways to influence politics that affect our business, and there are improper and illegal ways. Jack in the Box policy allows only legal and proper methods of political influence. JIB will not make illegal political contributions and will not reimburse employees for their personal political contributions, even if those contributions are made in the spirit of furthering JIB interests. It is unlawful and against JIB policy to:

- Bribe a public official or receive a bribe from a public official.
- Interfere with governmental functions.
- Intentionally submit incorrect, misleading, or fraudulent information to a public official.



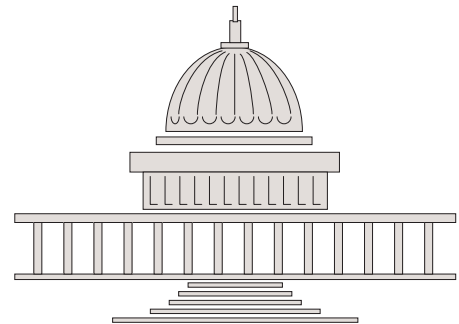
Taxation

Jack in the Box pays taxes to the local, state, and federal governments. Proper and accurate records must be maintained in order to satisfy this obligation. It is unlawful and against JIB policy to:

- a. Evade taxes that are lawfully owed by JIB.
- b. Fail to keep records that substantiate our obligation to pay taxes.
- c. Fail to provide information properly

requested by taxing authorities.

- d. Intentionally submit incorrect information to a government official.
- e. Intentionally falsify, destroy or withhold financial and tax records that are required by law to be retained.



we trust each other to...

... treat each other right.

Teamwork ... Integrity. We could say a lot about those two words. Really, what it comes down to is just doing our jobs the best we can and dealing with each other ethically; in other words, let's treat each other right. Here are some things to think about:

Conflict of Interest

Conflict of Interest arises when we do anything, on or off the job, that is against the best interests of our company. Any time our decisions and judgments about matters that affect our company may be influenced or impaired by personal or financial gain, there is a conflict of interest. Remember, even the appearance of a conflict is a conflict! Here are some examples of what we might find ourselves involved in that will be a conflict of interest:

1. Giving or accepting a gift may be a conflict of interest. Employees may not give or accept any gift of value which is or might be given for the purpose of improperly influencing the normal business relationship between our company and any of its suppliers, customers or competitors. This policy does not apply, within the bounds of reasonable discretion and common sense, to non-cash items commonly exchanged in business relationships or sponsorships of charitable events, up to a value of \$150.
2. Conducting JIB business with a relative (any immediate family member, significant other, or other relative, whether by blood or by marriage) may create a conflict of interest and is discouraged. If, for any reason, you anticipate conducting JIB business with a relative, please report this situation to your supervisor.
3. Having a financial interest in a competitor, vendor, supplier or contractor to our company, or a JIB corporate employee or board member having a financial interest in any franchise operation of JIB, Qdoba, JBX Grill or QuickStuff creates a conflict of interest.
4. Conducting a personal business venture while on the job is a conflict of interest.

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- 5.** Conducting a personal business venture while off the job, and which competes with Jack in the Box , is a conflict of interest.

Performance

We are all expected to perform the duties of our jobs competently, safely, efficiently and honestly. Supervisors are responsible to evaluate all employees on a regular basis and those evaluations are meant to give us constructive feedback on how to improve our performance.

Protection of Company Assets

Sometimes, in the performance of our duties, we are entrusted with the possession and/or use of company assets. It is our obligation to use those assets for the benefit of the company and for no improper personal benefit.

Working Off the Clock

It is everyone's responsibility to maintain an accurate accounting of hours worked. It is illegal and against company policy to allow or require any employee to work "off the clock".

Political Activity

Jack in the Box supports employees' rights to exercise their individual political activities in a lawful manner.

- 1.** No employee will be coerced in any manner to contribute to or otherwise support any candidate, office holder or ballot proposition.
- 2.** No employee's job will be jeopardized because of their participation or non-participation in any lawful political activity.
- 3.** No active campaigning for candidates or issues not related to JIB business interests is allowed on JIB property.

Safety

Jack in the Box believes that the personal safety of its employees is a primary responsibility we owe to each other. All reasonable procedures and equipment will be used to achieve safe working conditions.

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1. All employees must follow safe working procedures, use appropriate safety and protective equipment, and always be alert to potential injury to themselves and others.
 2. All employees must observe facility security procedures and use all security equipment.
 3. All employees are expected to report to their supervisor any and all conditions they believe to be unsafe, insecure, or unhealthy.
 4. Any act of violence or verbal or physical threat of violence will be treated seriously and must be reported immediately to the employee's supervisor, their Asset Protection Representative, Human Resources, or Jack's Ethics Helpline.

Sexual Harassment & Discrimination

1. Sexual Harassment

Sexual Harassment consists of unwelcome sexual advances, or visual, verbal, or physical conduct of a sexual nature when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or affect of unreasonably interfering with any individual's work performance or creating an intimidating, hostile, or offensive working environment.

2. Discrimination

Discrimination is any unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status, such as gender, sexual orientation, color, race, reli-

gion, national origin, age, physical or mental disability or other protected group status. It may include, for example, jokes or comments about another person's protected status, kidding, teasing or practical jokes directed at a person based on his or her protected status.

- Sexual harassment and other types of discrimination in the

work environment are strictly prohibited.

- Any employee having knowledge or suspicion of sexual harassment or other types of discrimination, whether or not as a victim, must report that knowledge to their supervisor or by using the Ethics Helpline.

our franchisees trust us to...

... do what is best for the entire system.

Our franchisees are a vital part of our company's business. They are an integral part of our continued success. We continuously strive to build solid working processes with our franchisees. We are guided by our belief that a trustful and dependable association requires that we:

1. Be fair and honest with all of our franchisees;
2. Maintain open and frank communications with our franchisees and to respond promptly to their concerns and interests;
3. Maintain the confidentiality of personal and business financial information from and about our franchisees;
4. Make objective assessments of the performance of our franchisees;
5. Work with our franchisees to assure our continued mutual success, and to commit with them to do what is in the best interests of the entire system;
6. Respect and vigorously enforce the "Six Month Rule" (as stated in the Corporate Policy Manual) regarding the hiring of franchisee restaurant employees by Jack in the Box Inc.-owned and operated restaurants.

using Jack's ethics helpline

Purpose

Whenever you have a question about what the right thing might be in a particular situation, try to talk with your supervisor first. Your supervisor may have faced a similar situation in the past or may know exactly what to do.

Sometimes, employees are not comfortable discussing things with a supervisor, so the Ethics Helpline should be the next step. The Helpline is for any question, concern, complaint, problem or issue that you have. The Helpline also offers guidance to help make the best decision among several choices.

"TRUST" and the Ethics Helpline are in place to make sure that problems do not get worse. If you are worried about a situation that involves a co-worker or supervisor, or just working conditions in general, we really need to know.

Procedure

- The Helpline is a toll free number: 1-888-613-JACK.
- The person calling will have to answer a few questions, so the Helpline staff has as much information as possible to help you.
- If you do not want to identify yourself, that is 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 sometimes problems do not keep regular office hours, so you can call any time. After regular hours, you may leave a message or call back during normal business hours. If you leave a message, you will be called back the next business day.
- Every issue that is reported by an employee using the Ethics Helpline is investigated. Any refusal of an employee to cooperate with an internal investigation into ethical or legal violations shall be subject to disciplinary action, up to and including termination.
- "TRUST" prohibits retaliation against any employee raising an issue in good faith, even if it turns out you were wrong in your belief. You will not be penalized for raising an issue or question in good faith.

