



Code of Conduct

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Code of Conduct

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I. Introduction

The Ignite Restaurant Group is a portfolio of unique restaurant concepts fused together by a common commitment to provide guests with memorable and matchless dining experiences. Ignite captures the idea that a spark of imagination, or a flash of inspiration, can ignite new, creative ideas and yield great results. We will continue to grow in the years ahead – through creative thinking, an uncompromising passion for delivering distinctive experiences for our team members and guests, and best-in-class results for our stakeholders.

Ignite Mission Statement

Deliver best in class returns by creating craveable experiences for our team members and guests, one great restaurant at a time.

Ignite Core Values

Care deeply

Lead boldly

Embrace exceptional people

Communicate openly and honestly

Do the right thing

Do what you say you will do

Intro to the Code

Do The Right Thing...At Ignite Restaurant Group we take those 4 words seriously. In order to “do the right thing” it is important to know what is considered right and wrong. As a restaurant company, most of what we do is captured in recipe books, ordering guides, Operating Procedures Manuals, etc. However, when we talk about “behavior” at Ignite, we are looking for the same clarity of what is right and what is wrong. To ensure clarity and consistency, we have written this “Code”.

All employees of Ignite Restaurant Group are expected to know and follow the Code of Business Conduct. Failure to do so may lead to disciplinary action, up to and including termination of employment.

This Code is not intended to be all-inclusive, but provides important information regarding the company’s established business practices. Local or department guidelines may be issued ad hoc to supplement or implement these basic principles.

Individual state laws or federal regulations may require modification of the practices outlined. Any questions or concerns regarding the proper course of action are to be discussed with the employee’s manager or Human Resources.

Any amendment or waiver of this Code of Business Conduct for executive officers or senior financial officers, including the Chief Financial Officer, Vice President of Accounting, and Controller, must be approved in writing by the Board of Directors and promptly disclosed as required by law or federal regulations.

Adherence to these guidelines should be a part of each employee’s daily work practices. Further guidance in applying them to each specific situation can be provided by the employees’ supervisor or manager. If necessary, contact the Legal Department or Human Resources Department for more specific guidelines or opinions.

Understanding these guidelines will assist in ensuring that the Company and its employees conduct their business with uncompromising integrity and professionalism.

II. Ethics and Compliance

Honest and Ethical Conduct

The Company expects all employees to act with the highest standards of honesty and ethical conduct while working on Company premises, at Ignite sponsored business and social events, or at any other place where the employees represent Ignite.

In all cases, if uncertain regarding the appropriateness of an event or action, seek assistance in interpreting the requirements of these practices by contacting your supervisor or Ignite's Human Resources Department.

Compliance with Applicable Rules and Regulations

All Ignite employees must comply with all applicable laws and regulations. Employees are expected to be familiar with the legal and regulatory requirements applicable to their business responsibilities and to fulfill their duties in accordance with these laws and regulations.

Disclosures in Governmental Filings and Other Public Communications

It is Company policy to make full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws, rules and regulations in the reports and documents that it files with or submits to various state or federal agencies, including the Securities and Exchange Commission, and in other public communications made by the Company. All employees are expected to use their best efforts to perform their duties in a manner intended to implement this policy.

Questions concerning the applicability of any legal or regulatory provision should be directed to Ignite's Legal Department.

Bribes, Kickbacks, Gifts and Gratuities

a) Bribes and Kickbacks:

Ignite employees may not offer or accept a bribe or a kickback. A bribe is defined as a thing of value given to someone with the intent of obtaining favorable treatment from the recipient. Kickbacks consist of payment in cash or in kind, including goods, services, the use of another company's property, or forgiving any sort of obligation provided to a guest or supplier for the purpose of improperly obtaining or rewarding favorable treatment in connection with a sale or purchase. Bribes and kickbacks may not be offered either directly or through a third party in order to obligate the recipient to return the favor.

b) Receiving Gifts:

A gift should not be accepted if the provider is in negotiations of any kind with Ignite or one of its restaurant companies. This limitation applies if the vendor was recently or about to enter into negotiations as well.

A gift should not be accepted if it compromises the objectivity of the recipient or could appear to do so. A common sense standard: If this gift was public knowledge, would it embarrass Ignite?

Beyond these exclusions, token gifts or meals can be accepted, as long as they are customary to the business relationship. A typical gift might be a meal or an inexpensive holiday gift. Cash or gift cards can never be

accepted from an outside vendor. Gifts of travel or hotel accommodations cannot be accepted under any circumstances.

In general, the value of a gift should not exceed \$300.00. For any gift valued at \$300.00 or more, a Disclosure Form must be completed, approved by your SVP, and submitted to the SVP/Chief Administrative Officer prior to acceptance.

When unsure about proper conduct, an employee should describe the situation to Human Resources. Policy violations should be reported promptly.

c) Gifts Used for Contests:

Occasionally, a vendor or supplier may sponsor a contest by offering gifts for the winners. As long as these gifts are clearly designed to improve sales, this policy does not apply to them.

d) Giving Gifts:

Equivalent rules apply to the giving of gifts. Avoid giving gifts that are intended to be innocent but may be construed as a bribe.

It is permissible to give plaques, supplier awards and prizes that are part of official programs with fair, openly-published rules for competing companies.

Free access to company resources or assets, such as computer time, and scrap or excess materials, is expressly forbidden. With the approval of a Senior Vice President or above, such access may be permitted for charitable organizations.

III. Conflicts of Interest and Insider and Confidential Information

Conflicts of Interest

Every employee must avoid situations that create, or could create, a conflict with the goals and business priorities of Ignite. Sometimes it can be difficult to determine if a given action or decision could create a conflict of interest with the company. In these situations, discuss the situation with your manager, the Legal Department or the Human Resources Department.

Family members and friends of Ignite employees are welcome to work for Ignite, or for our suppliers or competitors, as long as such employment does not harm Ignite. However, employees in certain positions have significant influence on company decision making. If you work in one of these positions, it is critical that you avoid anything that could appear to compromise your objectivity.

Some employees are required to complete "Conflict of Interest Forms" each year. Even if you are not required to complete such a form, it is critical that you avoid actions or decisions that could harm the company. The following illustrations are examples. There are many other areas in which a conflict of interest could arise. In partnership with your manager, apply common sense in reviewing potential conflicts.

a) Outside Employment:

Do not engage in any business outside of Ignite if it interferes with your performance or responsibilities to the Company. Our policies prohibit any employee from accepting simultaneous employment with an Ignite

supplier, developer, or competitor, and from taking part in any activity that enhances or supports a competitor's position. Hourly restaurant employees are permitted to hold an hourly position with a competitor. Flex Managers (Joe's Crab Shack) are permitted to hold non-management positions with competitors.

An employee may not directly or indirectly conduct outside business that interferes with the proper performance of the employee's job at Ignite, is conducted during an employee's normal working hours, or utilizes Ignite confidential information or specialized skills and knowledge gained as an employee of the Company. This includes becoming a contractor, consultant or supplier to Ignite or a competitor while being employed at Ignite.

Ignite will not conduct business with a former employee who becomes employed by a supplier or who offers his or her services as an independent contractor for a period of 12 months from the employee's termination date, without prior written approval from a Senior Vice President or above.

b) Business Interests:

If you are considering investing in the business interests of a supplier, developer, or competitor, you must ensure that your investment does not compromise your responsibilities to Ignite. You must also have the approval of the General Counsel or Compliance Officer. Many factors should be considered in determining whether a conflict situation exists, including:

- The ability to influence Ignite decisions or decisions of the other company;
- Access to the confidential information of Ignite or of the other company;
- The nature of the relationship between Ignite and the other business.

Typically, investments of less than 2 percent of the total outstanding shares in companies listed on a national or international securities exchange, or quoted daily by NASDAQ or any other board, do not create a conflict.

c) Related Parties:

Do not conduct Ignite business directly with a family member or close personal friend without the approval of the General Counsel or Compliance Officer. Also, avoid conducting Ignite business with a company for which a family member or close personal friend works at the director level or above. If it is in the best interests of Ignite that such business be conducted, the business relationship should be managed and negotiated by another employee who is not your subordinate. If this is not possible, the relationship must be overseen by Ignite's Chief Financial Officer. The business relationship will be carefully monitored to ensure that no preferential treatment is given to the company in question.

d) Other Situations:

Because other conflicts of interest may arise, it would be impractical to attempt to list all possible situations. If a proposed transaction or situation raises any questions or doubts in your mind, ask the General Counsel or Compliance Officer before entering into the relationship or situation in question.

Confidential Information

You may have access to information related to the company that is not known to the general public. Such information must be kept confidential. It can only be used for appropriate business purposes. Inappropriate

disclosure of confidential information can cause irreparable harm to the company and will not be tolerated. Confidential information can take a variety of forms, including but not limited to printed reports, electronic emails, voice mails, oral presentations, or electronic spreadsheets.

Confidential information can include business practices, recipes, marketing plans, development plans, long range plans, strategic plans, employee names, personnel files, social security numbers, bank account numbers and financial reports. These are a few examples. When in doubt if something is confidential, please discuss it with the General Counsel or Compliance Officer.

a) Protecting Confidential Information:

Confidential information may not be disclosed to anyone outside the company, except when required in order to conduct company business and approved by the General Counsel or Compliance Officer.

When printed confidential information is no longer needed, it must be shredded or placed in a locked receptacle designed to gather bulk material for shredding.

Confidential information must be maintained in a locked location whenever it is not in use. For example, personnel files must be in a locked file cabinet or locked office at all times. If kept in a locked office, non-management employees cannot be permitted unsupervised access.

b) Prohibited Use of Confidential Information:

Confidential information can never be used for personal gain. For example, if you are aware of confidential company plans to acquire another company, purchasing stock in that company would not only be a violation of this policy, but would also be a violation of the law. It is also prohibited to share this information with another person to facilitate financial gain.

Confidential information cannot be used for the benefit of any other company. For example, if you leave Ignite, you cannot use any of our forms or processes at your next company.

Confidential information cannot be shared with other employees unless there is a legitimate business purpose for them to have the information. For example, if you have access to financial data that includes payroll information, you cannot share that information with other employees, unless such sharing is required in order to properly execute your responsibilities.

Confidential information cannot be shared with friends and family, no matter how interesting the information may seem. Such disclosures, while not intended to do harm to the company, can have significant unintended consequences and could do irreparable harm to the company.

In the course of conducting Ignite business, you may have access to the confidential information of a vendor or business partner. Before receiving this confidential information, a company representative must sign a confidentiality agreement indicating that we will treat this information with the same care that we apply to our confidential information. You must treat this confidential information as carefully as if it was Ignite confidential information.

Confidential information from a third party cannot be accepted unless a confidentiality agreement has been signed. Further, confidential information can never be accepted if the holder of the information does not have a legal right to both possess the information and to share it with Ignite representatives.

c) Permitted use of Confidential Information:

Confidential information can be used as required to effectively execute the responsibilities of your job. It can also be used as a tool to review the performance of subordinates.

Confidential information from a third party can be used to assist in determining if the third party's products or services would be of value to Ignite. Once that determination is made, all such confidential information must be destroyed unless we enter into an agreement with the company, and that agreement requires the use of the confidential information. Examples of information that would fall into this category are trial software packages, pricing information, and detailed proposals that contain proprietary information.

With the written approval of the Chief Executive Officer, Compliance Officer, Chief Financial Officer, or General Counsel, you may be permitted to confidential information with a potential vendor, business partner or financial institution. In such cases, the general counsel will supervise the development of a non-disclosure agreement that must be signed by the potential recipient of confidential information before the information is provided.

You may share confidential information when required to by law or court order. However, such disclosure must be carefully limited in scope to that required, and can only be done with the approval of the general counsel.

d) Confidentiality Agreement:

When you joined Ignite, you signed an agreement to protect and hold confidential our proprietary information. This agreement remains in effect for as long as you work for Ignite and even after you leave the Company. Under this agreement, you may not disclose Ignite's confidential information to anyone or use it to benefit anyone other than Ignite without Ignite's prior written consent. Abiding by this agreement is a fundamental condition of your employment, and you should take its provisions very seriously.

IV. Employment Practices

Employees and the Workplace Environment

a) Diversity:

Supporting Ignite's core values requires an environment that is open, supportive, and interdependent. No action could be more contrary to our values than discrimination.

Ignite respects, values and welcomes diversity in our workforce, as well as in our guests and suppliers. Ignite's policy is to comply with all applicable laws and to provide equal employment opportunity for all applicants and employees without regard to non-job related factors such as race, religion, gender, national origin, ancestry, age, disability, veteran status, marital status or sexual orientation. This policy applies to all areas of employment, including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs.

b) At-Will Employment:

Unless otherwise agreed in writing and subject to any applicable law, each Ignite employee is employed by Ignite on an at-will-basis. This means that employment is not guaranteed for any specific duration of time and Ignite retains the right to terminate an individual's employment at any time with or without cause. No oral representations made by any Ignite employee with respect to continued employment can alter this relationship.

c) Legal Right to Work:

Ignite will only employ individuals who have a legal right to work in the United States. On the first day of employment, a new team member must present documentation required to complete the I-9 form. The employee must provide his or her true and legal Social Security Number on the first day of employment.

Management is prohibited from employing an individual without verification that the individual has a legal right to work in the United States. Intentionally entering an inaccurate or false Social Security Number into Ignite's Payroll System is grounds for immediate termination. The only exception is those candidates on special visas who require proof of employment before a Social Security Card will be issued.

d) Unlawful Harassment and Discrimination Policy:

Ignite is committed to providing a work environment free of unlawful discrimination and harassment. Actions, words, jokes, or comments based on pregnancy, childbirth or related medical conditions, race, religious creed, color, gender, national origin or ancestry, physical or mental disability, medical condition, marital status, registered domestic partner status, age, sexual orientation or any other basis protected by federal, state or local law or ordinance or regulation is strictly prohibited.

Definition of Harassment

Harassment, whether overt or subtle, is demeaning to another person, undermines the integrity of the employment relationship, and will not be tolerated by Ignite. While it is not always easy to define, prohibited harassment under this policy includes, but is not limited to, the following examples:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs, unwanted sexual advances, invitations or comments;
- Visual displays such as derogatory, offensive, and/or sexually-oriented posters, photography, cartoons, drawings or gestures;
- Physical contact including assault, unwanted touching, intentionally blocking normal movement or interfering with work because of sex, race or any other protected basis;
- Threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss and offers of employment benefits in return for sexual favors

Definition of Discrimination

Discrimination, whether overt or subtle, is referred to as the treatment taken toward or against a person or individual of a certain group based solely on one of the categories or classes' mentioned above. Discrimination can be overtly prejudice (hostile or negative feelings held by someone towards a specific race), stereotyping (attributing the same characteristics to all members of a certain group), or profiling (any action undertaken for reasons of safety, security or public protection that relies on stereotypes about race, color, ethnicity, ancestry, religion or place of origin to single out an individual for greater scrutiny or different treatment). Ignite is committed to maintaining a work and service environment

where all individuals are treated with respect and dignity and will not tolerate any type of discrimination. Examples of discrimination include but are not limited to:

- Refusing to provide service to a guest because of his or her race, national origin, gender, etc.
- Providing poor customer service to guests of a certain race while providing good customer service to guest of other races.
- Telling one group of guests that they are too noisy while not addressing another, equally loud group of guests, due to perceived social status.
- Denying entry to a service animal.
- Calling another person a negative name due to sexual orientation, race, religion, etc.

If an investigation shows that harassing or discriminatory behavior has taken place, the employee that committed the harassing or discriminatory behavior will be subject to disciplinary action, up-to and including immediate dismissal.

Procedure to Report Incidences

Employees who witness or feel that they are experiencing workplace harassment or discrimination by anyone, including co-workers, managers, supervisors, customers, or suppliers have an obligation to immediately report the problem to their Director of Operations or to any leader, as defined by the Open Door Policy.

Another option is to call the Ignite Open Door Hotline - Joe's Employee Hot Line at 866-882-0366 or Brick House Employee Hot Line at 866-287-2013. All reported or suspected incidents will be taken seriously and handled in a timely and confidential manner to the fullest extent possible. All individuals are expected to be truthful, accurate, and cooperative during any investigation.

Retaliation is Prohibited

*(Please refer to **Retaliation** section for details)*

Leader Responsibilities

All supervisors and managers have the responsibility to eliminate all harassing and discriminating behavior. If an allegation is brought to your attention, you must inform your supervisor. This responsibility includes communicating and enforcing this policy. Ignite will not tolerate harassment or discrimination by any person connected with the Company, and expects the utmost professionalism from its supervisors and managers. Any member of management who has knowledge of such conduct, yet takes no action to end it, may also be subject to disciplinary action, up to and including termination.

e) Open Door Policy:

The primary purpose of Open Door Policy is to encourage open communication and to allow all employees the opportunity to share their concerns and frustrations in a manner that can solve problems and enhance the quality of life at Ignite. This policy is called "open door" because it means that every leader's door (including the CEO) is open to help resolve your problem or concern.

Every restaurant should display the Open Door Policy poster clearly in the back of the house. If your poster is missing or damaged, contact Human Resources for a replacement.

Usual First Step: Talk to Your Manager or Immediate Supervisor

Whenever you have a problem related to the job or job satisfaction, you are encouraged to discuss it with your manager or immediate supervisor. With frank, open and respectful discussion, the problem can frequently be resolved at this level.

Usual Second Step: Talk to your Director, Vice President or Human Resources

If you are not comfortable discussing the issue with your immediate supervisor, you have the option of requesting a meeting or phone call with your director, vice president or with Human Resources. Although it is recommended that you talk to your director first, you have the option of addressing the problem at a higher level, if you choose. If you are not comfortable discussing the issue with your management team, at any time you may contact the Ignite Open Door Hotline at 866-882-0366 (Joe's) or 866-287-2013 (Brick House).

The Employee's Commitment

We ask that you come forward with complaints or concerns before they become big problems. We also ask that you address the issue in a respectful way, while being completely honest about what is happening and how you feel about it.

Ignite's Commitments

Our first commitment is to listen thoughtfully to your concerns, ask questions to understand, and work to thoroughly understand the issue.

Our second commitment is to respond quickly and honestly. If your complaint involves the behavior of other employees, we will not share our decisions or personnel actions with you, but we will follow our policies in researching and addressing the issue.

Our third commitment is that there will be no retaliation because of your use of the Open Door Policy. Of course you will still be held accountable to the same high standards as we all are, but you will not be singled out or treated unfairly as a result of your use of the Open Door Policy.

Contact Information

One or more posters with Open Door contact information is posted in every restaurant and the Restaurant Support Center. Employees are welcome to contact anyone listed on the poster, any member of the Ignite executive team, or the Human Resources Department (866-882-0366).

f) Performance Management:

Performance management is an ongoing process of setting clear expectations, holding employees accountable for meeting those expectations, and directly and effectively addressing performance issues. Managing employee performance is a responsibility that is shared by managers and employees.

Ignite formally appraises the performance of employees every year. The evaluation provides the employee with a documented review of performance and may result in a change in compensation. Employee performance is measured against factors such as individual performance expectations, departmental and/or corporate business objectives, contributions to team efforts, performance relative to peers and adherence to company values. Input on performance may be gathered from several sources, including managers, peers, and subordinates. Performance is documented each March using the Performance Appraisal Form, available

on Crab Net or Brick Net. This form was designed very simply, to allow managers and employees to discuss performance results as well as areas for improvement.

Remaining competitive requires that Ignite employees strive for continuous improvement in performance. Ignite encourages employees to take responsibility for their career development by maintaining and developing useful and marketable skills. In addition, managers are encouraged to provide a supportive environment to assist employees in career development.

g) Workplace Violence:

Ignite has a policy of zero tolerance for violence. Violence includes physically harming another, shoving, pushing, harassing, intimidating, coercing, brandishing weapons, and threatening or talking of engaging in those activities.

It is Ignite's intent to ensure that everyone associated with the business, including employees and guests, never feels threatened by any employee's actions or conduct. It is everyone's business to prevent violence in the workplace. Employees can help by reporting any workplace incident that could indicate a co-worker is in trouble. Employees are encouraged to report any incident that may involve a violation of any of the company's policies that are designed to provide a comfortable workplace environment. Concerns may be presented to your supervisor or Human Resources. All reports will be investigated and information will be kept as confidential as possible.

Drug and Alcohol Use

Employees may never report to work under the influence of alcohol or illegal drugs. Nor can they be consumed at work. Occasionally, limited alcohol consumption (three-drink limit) is permitted at company-sponsored events.

Off duty employees are always welcome to consume alcohol in our restaurants, but must adhere to the three-drink limit. We also ask that you not wear your uniform while off-duty in our restaurants or bars.

Safety Policy

Ignite is dedicated to the safety and well-being of all employees, guests, and visitors while on the premises or while conducting business on behalf of our company.

In accordance with the General Duty Clause of the Occupational Safety & Health (OSH) Act of 1970, it is the primary responsibility of all employers to provide a safe and healthy workplace. Accordingly, Ignite is committed to acting in a safe manner as guided by the Occupational Safety & Health Administration (OSHA) and other appropriate federal, state, and local agencies.

Locations and jobs are assessed for hazards and potential hazards. Appropriate safety measures will be implemented.

Responsibility for safety is a primary role of all employees. However, Human Resources will direct a company-wide safety program that meets the intent and requirements of this policy and appropriate federal, state, and local safety or safety-related standards and/or regulations, including but not limited to OSHA, NFPA, etc.

All employees in any leadership capacity are directly responsible for ensuring that hazard-specific safety measures and programs are implemented and followed. Managers should also ensure that operation specific hazard training is provided and documented, and that employees are aware of the hazards associated with their duties. Managers are also required to adhere to the standards established in this policy.

a) Hazard Assessment:

Human Resources with the assistance of Directors of Operations and General Managers will oversee/coordinate the hazard assessment of work sites/activities as needed, and implement appropriate safe practices/measures as needed.

b) Safety Committee:

Human Resources will establish a Corporate Safety Committee to assist with the review and evaluation of safe practices, accidents, program development/implementation, etc. The committee will meet on a regular basis and as dictated by company needs. When required by law, restaurant locations will conduct safety committees. Other locations may also utilize safety committees, at their option.

c) Hazard Prevention and Control:

It is the responsibility of all employees to maintain a safe work environment. This includes but is not limited to:

- Maintaining clean and organized work sites
- Ensuring that spills are immediately cleaned up
- Identifying and correcting safety hazards or unsafe acts
- Identifying and properly controlling hazardous materials
- Using appropriate personal protective equipment, including gloves when using knives
- Following safe practices at all times
- Maintaining and safely operating equipment, including ensuring that appropriate safety guards and devices are in place at all times while in use
- Maintaining fire safety at all times
- Participating in safety training

Hazard surveillance is a responsibility of all employees. Hazards should be reported to the appropriate manager/supervisor for corrective actions. Additionally, General Managers will conduct and document monthly safety inspections to help maintain safety. An inspection check list should be completed and maintained for a period of one year. The report will provide for documentation of corrective actions.

d) Safety Procedures:

Written safety procedures shall be established for OSHA compliance requirements as well as identified significant risks or hazards as appropriate for the location. This includes but is not limited to:

- Hazardous Materials Communication
- Blood-borne Pathogens Exposure Control
- Emergency Action Plans:
 - Police Emergencies & Security
 - Medical Emergencies
 - Fire

- Severe Weather
- Cooking Equipment Use
- Safe Use of Knives and Other Cutting Equipment

e) Training:

Safety training shall be conducted and documented in the employee's personnel file. General Safety Training will be provided to all employees upon initial hire as part of Ignite Restaurant Group New Employee Orientation and when required thereafter:

- Safety Policies and Task Related Safety Requirements
- Hazard Communication and Hazardous Materials Management
- Blood-borne Pathogens Exposure Control Plan (as appropriate for exposure)
- Ergonomic Hazard Awareness/Body Mechanics
- Emergency Action Plans and Fire Safety Plans (annually)
- Warning Signs and Devices
- General Workplace Hazards
- Housekeeping and Sanitation
- Emergency Medical Response
- Personal Protective Equipment

Other Function/Hazard Specific Training will be provided to the affected employees by the responsible manager/supervisor upon assignment and/or when new equipment or procedures are introduced. The General Manager is responsible for ensuring that training is provided and documented to include the topic discussed, date of the meeting, and names of attending personnel. The following training will be provided upon initial assignment to the work area, as required (i.e., when an employee's actions indicate that retraining may be needed), and at least annually unless otherwise indicated. Such training may include, but is not limited to:

- Fire Extinguisher/System Operation and Use – authorized persons only
- Chemical Specific Hazards
- Equipment Safety
- Tool Use and Safety
- Work Area Fire Safety
- Personal Protective Equipment
- Work Area Housekeeping and Sanitation

At least monthly, managers should include some type of safety training into pre-shift meetings.

f) Management Training:

Management and Supervisory personnel will participate in the following additional training:

- Conducting safety inspections
- Conducting Job Hazard Analysis
- Accident Investigations

g) Accidents/Injuries:

All work-related accidents, illnesses, and/or injuries, whether employee- or guest-related, must be reported to the appropriate manager/supervisor immediately. The manager/supervisor will immediately contact

Ignite's workers' compensation or guest liability insurance carrier, and complete an accident report as outlined in the Ignite Operations Manual. The manager/supervisor shall ensure that the report of injury is complete and accurate and includes information needed to determine the basic causes of the incident.

Death, or the hospitalization any employee – report immediately to Human Resources and the appropriate insurance carrier.

h) First Aid, First Aid Stations, and Emergency Medical Response:

A first aid kit is maintained at every Ignite location. All employees should know where the first aid kit is located. The General Manager should ensure that the kit always has enough supplies.

Emergency Medical Response. If an ambulance is needed dial 911. If emergency medical response via ambulance is not within 5 minutes response time, a manager can administer basic first aid.

CAUTION – You are potentially at risk of exposure to blood-borne disease when administering first aid to someone else. Wear protective gloves and avoid direct contact with blood and other body fluids. Employees are not required under this policy to administer emergency life support such as CPR.

Restaurant Security

The follow security measures shall be followed at all times. These measures are non-negotiable, and the first offense will result in termination.

Ensure that the front door is always locked:

- The front door should be locked before the restaurant opens for business and immediately after the last guest leaves at closing time. As employees arrive or depart, lock the door behind them every time.
- Delivery orders should be taken up to 30 Minutes before closing. To-Go Orders must be picked up by the guest prior to posted closing time.
- Once the front door is locked, no one should be allowed entry. Not an employee or a guest.

Ensure that the back door is always locked:

- The panic bar must be engaged at all times. The peep hole should be clear and show the back area, which must be well lit.
- When receiving a delivery or emptying trash, a manager must remain at the back door the entire time it is unlocked.

Ensure that the office door is always locked:

- Unless required to be open by a government official or regulation.
- The office door should always be locked when safe is open or money is being handled.
- Keys may not be given to employees to access the office.

Ensure that the safe is always locked:

- “Day Lock” is prohibited.
- Ensure that the bottom safe is always locked and money is dropped every time.

Ensure that roof access is always locked:

- Ensure that there is no point of access from the outside

- Ensure that the roof is locked from the inside

Never enter the building alone:

- No one enters the building alone.
- Be sure to lock the door **before** turning off alarm.

Never leave the building alone:

- Last two people leave together.
- Turn on the alarm **before** unlocking the door.

Vary your schedule of trips to the bank:

- Bank deposits must be made in daylight only.
- Managers should use inconsistent times to go to the bank. Criminals look for routines.

Don't be a hero:

- If you are the victim of a robbery, cooperate. Money can be replaced. Lives cannot.

Restaurant Support Center Security

Ignite aims to provide a secure business environment for the protection of our employees, products, valuable materials, equipment and proprietary systems and information. Materials, equipment and systems incorporated into the design of facilities and grounds will ensure adequate security in these areas. Security is the responsibility of all employees. Any breach of security should be reported immediately to your supervisor. Doors from Ignite offices to public hallways must be locked at all times. Employees are prohibited from blocking the door's closure for any reason.

When guests visit the Restaurant Support Center, they must be escorted by an employee during their entire stay.

Internal Information Posting

Ignite has a number of methods for posting information on walls and on information systems for the purpose of communicating. Posting in any of these places is limited to company-related material, including statutory and legal notices, safety and disciplinary rules, company policies, memos, announcements of general interest and other items relating to Ignite. Postings of a personal nature are not permitted. Employees are prohibited from posting solicitations for personal business or charitable donations.

Solicitation

Employees, whether on or off duty, are prohibited from soliciting other employees for any reason, unless it is for an officially sanctioned program. Prohibited solicitations include (but are not limited to):

- Donations to charities unless officially sanctioned by the Company.
- Fundraising sales, such as cookies or candy.
- Promoting personal or family businesses.

Social Media Policy

Social media sites, such as Facebook and Twitter, are powerful tools for sharing information and learning. Ignite encourages their use, utilizing the following guidelines:

- Ignite Restaurant Group operates several social media sites for the purpose of marketing our restaurants to guests and potential guests. These sites are also valuable sources of feedback. Current employees are prohibited from making entries into these sites without the written permission of the Chief Marketing Officer.
- Ignite employees are prohibited from creating or maintaining social media sites that represent, or may appear to represent, individual Ignite owned restaurants.
- Ignite employees may from time to time decide to discuss the company on other sites. In such cases, you must identify yourself as an employee, and adhere to the standards contained in this Code of Business Conduct. At all times, when an employee comments about the company—whether complimentary or critical—he or she must add the following disclaimer:

*This posting is my own and does not necessarily represent
Ignite's positions, strategies or opinions."*

- Employee entries cannot include confidential information about the company or any of its business partners.
- These policies apply around the clock. They are not limited to working hours.

Employee Reimbursement

Ignite's intention is to fund management-approved business travel, training, relocation, and other expenses necessary to conduct our business. Expense reports should include original receipts for all expense incurred, and be submitted within two weeks of trip completion. Your expense report must be approved by your immediate supervisor and department head.

When more than one employee participates in a business activity, meal, or entertainment that is being expensed, the senior-most employee should pay the bill and submit the expense report.

V. Business Practices

Dealing with Competitors

It is against Ignite policy to have a discussion or communication with any competitor relating to price or any matter that affects pricing, including costs, credit terms, allocation of markets, geographies, customers or lines of business.

Financial Reporting

a) Accounting Practices:

The Chief Executive Officer and the senior financial officers have the direct and primary responsibility to ensure full, fair, accurate, timely and understandable disclosure of Ignite's financial information. Senior financial officers include the Chief Financial Officer, the Vice President of Accounting, the Controller, and each of their direct reports who have responsibility for the preparation of financial statements and disclosure of financial information.

Ignite's responsibilities to its investors and lending institutions, as well as its obligations under the laws governing corporations, require that all transactions be fully and accurately recorded in the Company's books and records. Financial statements must fairly and accurately present the financial condition of the business. False or misleading entries, unrecorded funds or assets, or payments without appropriate

supporting documentation and approval are strictly prohibited and violate Ignite's policy and the law. Additionally, all documentation supporting a transaction should fully and accurately describe the nature of the transaction and be processed in a timely fashion.

Ignite maintains a system of internal controls to assure appropriate authorization, recording and accountability of our company's assets. Ignite's internal control system is never to be intentionally circumvented. All records shall be prepared accurately, reliably, honestly and in accordance with established finance and accounting procedures.

b) Interaction with Independent Accountants:

All of the Company's books and records are subject to review and audit. A response to requests by internal auditors, legal staff and independent accountants, must include all relevant information.

Employees may not take any action to fraudulently influence, coerce, manipulate or mislead an independent accountant who is engaged in the performance of an audit or review of Ignite's financial statements for the purpose of rendering the financial statements misleading.

Types of conduct that would constitute improper influence, include, but are not limited to, directly or indirectly:

- Offering or paying bribes or other financial incentives, including offering future employment or contracts for non-audit services;
- Providing an auditor inaccurate or misleading legal analysis;
- Threatening to cancel or canceling existing audit or non-audit engagements if the independent accountant objects to the company's accounting;
- Seeking to have a partner removed from the audit engagement because the partner objects to the company's accounting;
- Blackmailing;
- Making physical threats.

c) Records Retention:

Business documents and records are important company assets and contain data and information critical to the continuity of our business, preserve information necessary to protect our legal rights and support and document tax and other regulatory requirements. Employees are prohibited from tampering with company records or removing or destroying them prior to the dates specified in record retention schedules.

Ignite's record-retention policies are established in compliance with local laws. The policy dictating record retention for restaurants locations and the Restaurant Support Center and the minimum periods are included in the Company's Record Retention Policy. Periodically disposing of documents that are no longer useful and do not need to be retained is just as important as knowing when to save information.

External Communications

a) Press and Internet Inquiries:

It is Ignite's intention to maintain open and consistent communications with the media. To ensure the accuracy of all information provided, individual employees should not respond on Ignite's behalf in any public forum, including the Internet, on-line services and the press even when they are visiting our facilities. When questioned by a member of the press, an employee should respond with the following statement:

“I am not authorized to speak on behalf of the company. Please contact the Vice President of Marketing for Ignite Restaurant Group at 713-366-7500.”

All press inquiries should be forwarded immediately to the Vice President of Marketing.

Falsification of Company Records

Employees are prohibited from knowingly falsifying company records. Examples of violations include:

- Entering an inaccurate Social Security Number into the payroll system.
- Reporting inaccurate inventory information.
- Delaying invoice processing to create the impression of greater profitability.
- Allowing employees to work off the clock or inaccurately editing their recorded work hours.
- Accepting fraudulent I-9 documentation.

VI. Use and Protection of Assets and Electronic Systems

Use and Protection of Assets

Protecting Ignite’s assets is a key fiduciary responsibility of every employee. Care should be taken to ensure that assets are not misappropriated, loaned to others, or sold or donated, without appropriate authorization.

Every Ignite employee is responsible for protecting the assets of the company. Each employee is also responsible for understanding Ignite’s obligations for protecting assets that have been entrusted to it by customers or suppliers, and for treating them accordingly.

The company’s assets include physical assets, such as equipment and buildings, as well as our funds, intellectual property, trade secrets and confidential information.

To protect Ignite’s assets, they must be adequately safeguarded. This requires locking up and securing valuable assets. Ignite’s assets may not be sold, borrowed, lent, given away or modified in any way that would impact their value, unless there is a good business reason and with approval of the department head / VP.

Right to Search

Ignite does not allow the unauthorized removal of company assets or physical property from our premises, or sharing of our intellectual property in an unauthorized manner. To ensure proper protection of our employees and assets, Ignite regulates the possession and movement of assets, subject to the limitations imposed by local law.

Areas subject to search include an employee’s briefcase, backpack, workspace, desk, computer, file cabinet, locker or similar place where employees may place personal possessions, whether or not such places are locked. Such inspections or searches may also include, but are not limited to, computer files, floppy disks, hard drives, e-mail or other electronic mail; an employee’s vehicle when on Ignite property; or items of personal property while on Ignite property.

Company Resources

Company resources, include (but not are limited to) cash, personnel, equipment and vehicles and may only be used for legitimate company business purposes.

Ignite strives to furnish all employees with the equipment necessary to efficiently and effectively do their jobs. As an employee, you have the obligation to care for that equipment and use it responsibly. If you use Ignite equipment at your home or off site, take precautions to protect it from theft or damage, just as if it were your own. If you leave Ignite employment, you must immediately return all Company-owned equipment.

For Example:

- An Ignite employee may not make business trips or purchase an airline ticket at a premium price just to obtain frequent flier miles or other awards for his or her private use.
- No one outside the company may have access to our computers.

Electronic Equipment Use

Computer equipment and cellular telephones owned by Ignite are intended for business use only. While occasional personal use is permitted, the employee should know that the company has the ability to review all uses, and will use this ability when an executive of the company believes that a computer may have been used inappropriately.

- Any data created and stored on Ignite's network or individual computers, cellular phones and other mobile devices becomes the property of the company. As such, the company retains the right to use the data as it sees fit.
- Employees are responsible for exercising good judgment regarding the reasonableness of personal use. An occasional review of a personal email account is considered reasonable.
- Employees are not permitted to store personal pictures, music or videos on the company network. Because network resources are limited, this is prohibited.
- All mobile devices owned by the company must be password protected.
- The company reserves the right to completely remove any data stored in any mobile device owned by the company. This can be done at any time and without prior notice to the user.
- Any personal mobile devices used to access and store company data will be subject to the same rules as the corporate-owned mobile devices: they must be password protected and are subject to data removal when the company deems necessary.
- All desktop computers and workstations should be password protected with an automatic deactivation in ten minutes or less. Before leaving the work location, at all times, the employee should ensure that computer access is locked.
- To conduct company business, employees must maintain multiple passwords. It is critical that these be kept confidential. Passwords should not be shared. Nor should they be kept in a location accessible to others.
- Personal software programs cannot be installed on company equipment without the written permission of the vice president of I.T.
- Company equipment cannot be used to procure or transmit material that is in violation of sexual harassment or hostile workplace laws or policies. Violation of this policy will result in immediate termination.
- Any action that interferes with Ignite's ability to conduct business or to protect its confidential data is prohibited. These prohibited actions include, but are not limited to, network monitoring not authorized by the I.T. department, circumventing user authentication or security of any host, network or account, facilitating a denial service attack, and introducing malicious programs into the network or server.
- Creating or forwarding chain letters, Ponzi schemes or other pyramid schemes is prohibited.

- Using company email accounts to conduct personal business is prohibited.

Software

Ignite's policy is that all software used by employees to conduct Ignite business must be authorized copies. Never make or use illegal or unauthorized copies of any software, whether in the office, at home, or on the road, since doing so constitutes copyright infringement and may expose you and Ignite to potential civil and criminal liability.

Use of E-mail

E-mail is a convenient, fast, and effective way to communicate with other employees, our business partners, and guests; however, it must be used appropriately. Irresponsible, careless, or insensitive statements in an e-mail can be taken out of context and used against you and the Company. Similarly, disparaging comments made against others could, under certain circumstances, constitute libel or a form of harassment.

Please observe the following simple rules when preparing and sending e-mails:

- Avoid unfounded assertions, angry responses, threats, speculations, or suppositions about the actions of Ignite, its employees, or third parties.
- Label e-mail messages containing confidential information with the appropriate Ignite confidential label. This tells the recipient how to treat the information in your message.
- Copy only those who need to know what you are saying in order to do their jobs.
- Do not forward or send e-mails containing confidential information outside of the Ignite corporate intranet. If you have a business need to communicate with someone outside of Ignite, confirm with your manager that the appropriate agreements are in place before mailing information over the network.
- If you need to address a sensitive legal question to a member of the Ignite Legal Department, label the e-mail "Attorney-Client Confidential" in the subject heading and do not copy anyone unless requested to do so by the attorney. This will allow us to not provide a copy of the email in responses to a subpoena or court order. Of course, not all issues require this procedure, when in doubt; contact the Legal Department to discuss how to proceed.
- E-mail cannot be used to conduct personal business or perform work for anyone other than Ignite. Nor can it be used to solicit donations unless the charity is approved by the Chief Marketing Officer.
- E-mail must never be used to send or receive illegal, obscene, or offensive messages or files.
- E-mail must not be used to engage in political activities, to express personal opinions to journalists, or to take public positions on issues without the prior consent of Ignite management.

Information Security

Confidential information generated by or used in any company business activity is considered an information asset. This includes (but is not limited to) information originating from direct access to computer systems, information carried over networks, information preserved on portable electronic media and information appearing in hard-copy format.

At the time of hire, management and RSC employees must sign an agreement to protect Ignite's confidential information and intellectual property rights during and after employment with Ignite. Upon termination of employment, employees must provide Ignite with any company owned material or proprietary information (i.e., patents, designs, data), and authorize ownership of that information to Ignite.

Ignite requires that each employee be personally responsible for safeguarding the company's information assets, in all its various forms, from loss, inappropriate modification and disclosure to anyone who lacks either the authorization or the need-to-know.

All employees are required to:

- Protect the confidentiality of information such as product roadmaps, strategic long-range plans, product pricing, and employee salary data, which, if disclosed, could cause financial or other damage to Ignite.
- Hold in confidence and not use (except for the benefit of Ignite) any confidential information that they have access to or that was created by them while employed at Ignite.
- Protect third-party confidential information in the manner required by the terms of a Memorandum of Agreement. If such terms are not known, that information should not be used, copied or disclosed until the terms of the Memorandum of Agreement are known.
- Ensure that confidential information that may need to be released to customers or suppliers is handled properly. In such cases, an employee must have received proper authorization (approval from their manager or the Legal Department) and must ensure that the recipient has a need-to-know and signs a nondisclosure agreement. Requests for confidential information from outside sources must be handled only by authorized persons.
- Be personally accountable to Ignite and legally accountable for their actions.

VII. Violations of the Code

The matters covered in this Code of Business Conduct are of the utmost importance to Ignite and its Leadership Team and are essential to the Company's ability to conduct its business in accordance with its Core Values. We expect all of our employees, contractors, and consultants to adhere to these rules in carrying out their duties for Ignite.

Reporting Potential Violations of the Code

If you know of or suspect any conduct which you believe to be inconsistent with Ignite's Code of Business Conduct or requirements of the law that involve a director or executive officer, you are obligated to report it to the Audit Committee. If you know of or suspect any conduct which you believe to be inconsistent with Ignite's Code of Business Conduct or requirements of the law that involve any other person, you are obligated to report it to one of the following: your manager, a member of the Leadership Team, any member of the Legal Department, or to the Company's Human Resources Department.

If an employee needs assistance in evaluating proposed conduct, or if an employee observes or suspects any violation of the Code, he or she should first tell his or her supervisor. If the employee is uncomfortable speaking with his or her supervisor for any reason, he or she should contact Human Resources or the Legal Department.

Retaliation

Employees can raise their concerns of violations of the Code of Business Conduct, or other illegal or unethical conduct without fear that they will be disciplined or terminated.

Retaliation or adverse treatment of any employee reporting an incident based upon truthful perception of events or providing information related to the incident will not be tolerated. Examples of retaliation may include, but not limited to, the refusal to assign meaningful work, reduced working hours, unwarranted disciplinary action, unfair work performance evaluations, or a dismissal. Any concern regarding retaliation

should be reported as soon as possible to the Human Resources Department or the employee’s immediate manager. In no way should this be interpreted as preventing a manager from appropriately disciplining an employee as long as the discipline is consistent with what would have been done to another employee or before the complaint was made.

Given the serious nature of harassment and/or discrimination allegations, Ignite recognizes that false accusations can have serious effects on innocent individuals. False and malicious accusations of harassment, discrimination or retaliation will be subject to further disciplinary action, up to and including termination of employment.

Violations of the Code

Ignite will take appropriate disciplinary actions, against any employee, contractor, or consultant whose actions are in violation of this Code of Business Conduct.

Disciplinary actions may include immediate termination of employment or the business relationship, at Ignite’s discretion. Where the Company has suffered a loss, it will pursue its remedies against the individuals or entities responsible. Where laws have been violated, Ignite will cooperate fully with the appropriate authorities.

VIII. Phone Numbers

Human Resources.....(713-366-7631)
Legal Counsel(713-366-7502)

IX. Appendix

**ANNUAL ACKNOWLEDGMENT OF
RECEIPT OF CODE OF CONDUCT**

I have received and read the Ignite Code of Conduct, dated May 9, 2012. I understand the standards and policies contained in the Code of Conduct. I understand that the company employs additional policies, which are posted on Crab Net and Brick Net. I agree to follow the requirements of this Code of Conduct and other policies.

If I have questions concerning the meaning or application of the Code of Conduct, any Ignite policies, or the legal and regulatory requirements applicable to my job, I know I can consult my manager, the Human Resources Department, or the Legal Department, knowing that my questions or reports to these sources will be maintained in confidence.

I agree that my Electronic Signature (whether digital or encrypted) is intended to authenticate this writing and has the same force and effect as a manual signature. “Electronic Signature” means any electronic sound, symbol, or process attached to or logically associated with a record and executed and adopted by a party with the intent to sign such record.

ACKNOWLEDGEMENT:

EMPLOYEE SIGNATURE

DATE