PAPA JOHN'S INTERNATIONAL, INC.

AUDIT COMMITTEE
CONCERN REPORTING PROCEDURES

Effective February 20, 2008

Papa John's International, Inc. (the "Company"), is committed to achieving and maintaining compliance with all applicable laws and regulations, accounting standards and controls, audit practices and our own policies and procedures governing business conduct. Any person may submit a complaint or concern about the Company's or any team members' compliance in those areas without fear of retaliation of any kind.

The Audit Committee of the Company's Board of Directors is responsible for adopting and maintaining policies and procedures to facilitate reporting of certain compliance complaints and concerns and the handling of those reports when submitted. The Audit Committee has established policies and procedures regarding reports in the following areas:

- ✓ fraud or error in the preparation, evaluation, review or audit of any of the Company's financial statements;
- ✓ fraud or error in the recording and maintenance of the Company's financial records;
- ✓ deficiencies in, or failure to comply with, the Company's internal accounting controls;
- ✓ misrepresentation or false statement to or by a member of senior management or an accountant regarding a matter contained in the Company's financial records, financial reports (including but not limited to discussions in quarterly and annual reports filed with the Securities and Exchange Commission) or audit reports of the Company;
- ✓ deviation from full and fair reporting of the Company's financial condition; and
- ✓ violations of applicable laws, rules and regulations; Nasdaq listing standards; the Company's Code of Ethics and Business Conduct; the Company's policies regarding trading of securities; and any other code, policy or procedure.

For purposes of these procedures, reports and concerns regarding accounting, internal accounting controls or auditing matters may be referred to as "Accounting Concerns," and reports and concerns regarding potential or actual violations of other applicable laws or regulations or of the Company's codes, policies or procedures may be referred to as "Compliance Concerns."

Methods of Reporting Concerns

Papa John's team members are encouraged to report any concern to a manager or supervisor, if practicable, or to an Employee Relations representative in the Papa John's Human Resources Department. Executive officers and members of the Board of Directors may report concerns to the Company's General Counsel or the Chairman of the Audit Committee.

Any person, including a team member, may report any concern (including an Accounting Concern) by contacting the office of the Company's General Counsel, at Papa John's International, Inc., P.O. Box 99900, Louisville, KY 40269, or (502) 261-7272.

In addition, any person may submit a concern (including an Accounting Concern) on a confidential, anonymous basis:

- by contacting Shareholder.com, a third-party service provider retained by the Company to receive reported concerns by voice mail, e-mail or the internet (the "Ethics Hotline"), at:

  voice: (866) 495-4159
  e-mail: pzza@openboard.info
  internet: www.openboard.info/pzza; or

- by submitting a concern in writing and marked "Confidential" to the office of the Company's General Counsel or to the Director Internal Audit at Papa John's International, Inc., P.O. Box 99900, Louisville, KY 40269.

Any concern submitted on a confidential, anonymous basis should include enough specific information to permit the Company to investigate and respond appropriately. These methods of reporting concerns, including contact numbers and addresses, will be communicated to Papa John's team members from time to time and posted on the Company's website.

Handling of Reported Concerns

All reported Accounting Concerns or Compliance Concerns received by any manager, supervisor, Human Resources Department representative, or the Director Internal Audit will be reported to the General Counsel's office as soon as practicable. Shareholder.com will maintain a record of all Ethics Hotline reports and provide them to the General Counsel's office, and to the Internal Audit department and other persons the Company may specify. The General Counsel will maintain a log of all reports received directly or through another Company representative.

Upon receipt of a report, the General Counsel or other appropriate Company representative will determine whether the report involves an Accounting Concern or a Compliance Concern and whether the report is significant. Reports are considered significant if they allege in good faith:

- an Accounting Concern or a Compliance Concern that involves any member of the Company's senior management;
- an Accounting Concern involving intentional or deliberate violations of applicable laws or regulations governing the financial reporting process or related Company policies and procedures;
- an Accounting Concern involving fraud or other misconduct by employees (other than members of the Company's senior management) who have a significant role in the Company's internal accounting controls; and
- matters that could create a conflict of interest if investigated by management.

The General Counsel will advise the Audit Committee of significant reports as soon as practicable, and in any event within five business days of receipt by the General Counsel.

Other than those reports that the Audit Committee determines to handle differently, all Accounting Concerns and all significant Compliance Concerns will be reviewed and handled under the direction and oversight of the Audit Committee, with assistance by the General Counsel, the Company's Finance or Internal Audit departments or other persons both within and outside the Company, as the Audit Committee deems appropriate. Compliance Concerns that are not significant will be reviewed and handled under the direction and oversight of the General Counsel, with assistance of other persons both within and outside the Company, as the General Counsel deems appropriate.

If a report involves the General Counsel, the Director Internal Audit will be responsible for determining whether the report is significant and for handling the report in accordance with the foregoing procedures.

The General Counsel will submit a report to the Audit Committee quarterly and more often as the Audit Committee requests communicating all reported Accounting Concerns and significant Compliance Concerns and summarizing, among other things, the manner in which the reports are being investigated, the status of any investigations, recommended remedial actions, and the disposition of any reports.

In initiating any investigation of a reported concern, the Audit Committee or the General Counsel, as the case may be, will consider and determine (a) who should conduct the investigation, (b) any necessary steps to preserve documents and other information, (c) the initial scope of the investigation, and (d) whether the matter should be disclosed publicly, to any law-enforcement or regulatory agency, or to the Company's independent auditors.

All reported concerns will be treated as confidential to the fullest extent possible, consistent with the need to conduct an adequate review and investigation and to effect any required resolution. Whenever possible, the Company should acknowledge receipt of submitted

concerns and communicate to team members who submit concerns the outcome of the Company's investigation.

The Company will take prompt and appropriate corrective action following an investigation of a reported concern, when and as warranted in the judgment of the Audit Committee, General Counsel or other person or group responsible for resolving the concern, as the case may be.

Protection from Retaliation

The Company will not permit any discrimination, retaliation, harassment or other adverse action against any person as a result of that person's good-faith complaint, report or concern under these procedures, or against anyone who participates in good faith in an investigation of any complaint, report or concern.

Records Retention

The General Counsel will retain records of all documents and other information related to any reported concern in accordance with the Company's then-current records retention policy. The Audit Committee and the Company's outside auditors may review such records from time to time upon request.

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