

BJ's RESTAURANTS, INC.

Human and Labor Rights Policy

BJ's Restaurants, Inc. (BJ's or the "Company") supports fundamental human rights for all. We strive to be a responsible corporate citizen and create a positive impact in the communities where we operate through charitable giving and volunteerism, team member engagement, and environmental stewardship.

We strive to protect human rights through our practices and policies and by complying with the federal, state and local laws of the places where we do business. Our commitment to human rights is guided by the laws of the United States governing human rights as well as the following international documents:

- United Nations Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- International Labor Organization's Declaration on Fundamental Principles and Rights at Work
- UN Global Compact and the ten principles set out in this framework

Equal Employment Opportunity

BJ's is firmly committed to the practice of equal opportunity employment. It is our policy to prohibit discrimination against anyone because of race, color, religion, sex, sexual orientation, gender identity or expression, marital status, age, national origin or ancestry, physical or mental disability (including AIDs and HIV), medical condition, genetic characteristics, pregnancy (including childbirth, breastfeeding, or any related medical condition), military or veteran status, or any other legally protected status under federal, state, or local laws. All personnel decisions, including but not limited to recruitment and employment, promotion, demotion, transfer, layoff, termination, rates of pay and other forms of compensation, education, and training must be made without prejudice or discrimination on the basis of a protected category.

We embrace diversity because we recognize that we are a stronger company when we reflect the diversity of our communities and different voices. Treating every team member with respect and fostering a culture of inclusion and equity is vital to our success and growth. We promote, protect and help to ensure the equal rights of all persons, including people from under-represented and vulnerable communities, women and those with disabilities. We are committed to stakeholder involvement to help us understand diverse experiences, perspectives and perceptions and evolve our actions supporting this policy. To this end, BJ's takes an active, strategic approach to appreciating and fostering open dialogue about our individual and collective experiences, different ways of thinking, and diverse communication styles via Listening Circles, engagement surveys, and development experiences.

Code and Principles of Integrity, Ethics & Conduct

Our key values and culture encourage a relationship of trust, loyalty, respect, honesty, accountability and responsibility among our team members at all levels.

We expect our team members to act lawfully in all actions and interactions with colleagues, vendor partners, potential suppliers, guests and members of our community as outlined in our Code of Integrity, Ethics & Conduct.

In addition, we have developed our ten Principles of Integrity, Ethics and Conduct (the “Principles”) to communicate the high ethical standards that we must follow throughout the Company. Every team member has a responsibility to know and follow these Principles at all times when acting on behalf of BJ’s:

1. Do the right thing.
2. Treat everyone with respect and dignity.
3. Be honest and trustworthy.
4. Appreciate diversity.
5. Act in both the spirit and letter of the law.
6. Use good judgment.
7. Take ownership.
8. Embrace change.
9. Speak up if something does not seem right.
10. Ask for help when needed.

Our managers and Restaurant Support Center team members receive training on our Code of Integrity, Ethics & Conduct at time of hire and annually during employment. Our hourly restaurant team members receive training on our Principles at the time of hire and periodically during employment. Because our Principles are general in nature, team members also have a responsibility to know and follow the specific guidance contained in all of our established policies and procedures. In addition, we must rely on the common sense and good judgment of all of our team members to always act in the best interests of our Company.

Labor Practices

BJ’s promotes a working atmosphere that encourages our team members to talk with any member of the management team about work-related concerns and suggestions. We have an Open Door Policy, and all of our managers should strive to answer any questions, listen to complaints or concerns about working conditions or treatment our team members feel they are receiving, and encourage and listen to suggestions and ideas.

If our team members do not feel comfortable addressing an issue with their direct supervisor or another member of the management team, BJ’s offers other avenues as part of our open door policy, including ones that allow them to address issues in an anonymous manner:

- Our Team Member Relations Department is available at (714) 500-2400 or TMR@bjri.com
- Anyone can send a written letter to our Team Member Relations or Legal Departments at 7755 Center Avenue, Suite 300, Huntington Beach, CA 92647

- Our Team Member Hotline can be reached at (877) 510-0257 or www.bjsteammemberhotline.com. Callers may choose among multiple languages and are not required to reveal their identity if they wish to remain anonymous.

At BJ's, we are committed to providing working conditions that enable our team members to thrive. Employment is expected to be in compliance with all applicable laws and regulations, including those governing working conditions, compensation, benefits, opportunity, and hours. We respect each team member's right to discuss their wages and working conditions and to make an informed decision, free of coercion, intimidation, or harassment, about membership in associations.

All of our managers review and acknowledge an Accurate Timekeeping Policy that addresses key aspects of wage-and-hour policy requirements at the time of hire and periodically during employment. If any team member has questions about their wages, schedules or pay, they are encouraged to discuss these with management or contact our Team Member Relations or Payroll Departments.

Policy Prohibiting Discrimination, Harassment and Retaliation

BJ's Restaurants, Inc. is committed to providing a work environment that is free of unlawful discrimination, harassment, and retaliation based on any legally protected status or activity. The Company forbids any discrimination and harassment against team members, applicants for employment, individuals providing services in the workplace pursuant to a contract, and interns based on their actual or perceived race, color, religion, sex, sexual orientation, gender identity or expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), marital status (including registered domestic partnership status), age, national origin or ancestry, physical or mental disability (including AIDS and HIV), medical condition, genetic characteristics, pregnancy (including childbirth, breastfeeding or any related medical condition), protected military or veteran status, an individual's perceived membership in a protected status, or any other legally protected status of an individual or that individual's associates or relatives. The Company will not tolerate any form of discrimination, harassment, or retaliation that violates these policies.

For purposes of this policy, discrimination on the basis of "national origin" also includes discrimination against an individual based upon any of the following: an individual's or individual's ancestors' actual or perceived physical, cultural or linguistic characteristics associated with a national origin group; marriage to or association with individuals of a national origin group; tribal affiliation; membership in or association with an organization identified with or seeking to promote the interests of a national origin group; attendance or participation in schools, churches, temples, mosques or other religious institutions generally used by persons of a national origin group; or a name that is associated with a national origin group; or having a driver's license issued to those who cannot document their lawful presence in the United States. A team member's or applicant's immigration status will not be considered for any employment purpose except as necessary to comply with federal, state or local law.

The Company allows team members to self-identify their gender, name and/or pronoun, including gender-neutral pronouns. The Company will use a team member's gender or legal name as indicated on a government-issued identification document only as necessary to meet an obligation mandated by law. Otherwise, the Company will identify the team member in accordance with the team member's current gender identity and preferred name.

These policies apply to all team members involved in the operation of the Company and prohibit harassment by any team member of the Company, including managers and hourly team members. In addition, these policies also extend to protect our team members from harassment by guests, vendors or others doing business with the Company and to protect our guests, vendors, and others doing business with the Company from harassment by our team members. If behavior that violates this policy is committed in the workplace by someone not employed by the Company, the reporting and complaint procedure must still be followed. The workplace includes: actual worksites, any setting in which work-related business is being conducted (whether during or after normal business hours), online and electronic interactions with Company team members and third parties involved in our operations, Company-sponsored events, and Company-owned/controlled property.

Prohibition of Harassment on the Basis of Sex and Gender

BJ's prohibits harassment on the basis of sex and gender. Federal and state laws define sexual harassment as unwanted sexual advances, requests for sexual favors, or visual, verbal or physical conduct of a sexual nature when submission to such conduct is made a term or condition of employment, or when submission or rejection of such conduct is used as a basis for an employment decision affecting the individual, or such conduct has the purpose or effect of unreasonably interfering with a team member's work performance or creating an intimidating, hostile or offensive working environment even if the individual making the report is not the intended target of such conduct.

The following is a partial list of sexually harassing behaviors:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Withholding employment benefits due to a refusal to participate in sexual activity.
- Making or threatening retaliation after a negative response to sexual advances.
- Sending or forwarding e-mail messages, text messages, tweets, etc. of a sexual or inappropriate nature.
- Posting content of a sexual or inappropriate nature on Company or team members' social media websites.
- Visual conduct of a harassing nature including but not limited to leering, making sexual gestures, displaying sexually suggestive objects or pictures, cartoons, posters, internet web pages or screen savers.
- Verbal conduct of a harassing nature including but not limited to making or using derogatory sexual comments, slurs, sexually explicit comments or jokes, and inappropriate comments about a team member's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes, invitations or e-mail messages.

- Physical conduct of a sexual nature including touching, assaulting, impeding or blocking movements.
- Sexual assault defined as unwanted conduct of a sexual nature that is inflicted upon a person or compelled through the use of physical force, manipulation, threat, or intimidation
- Retaliation for reporting harassment or threatening to report harassment.

Sexual harassment can occur regardless of the gender of the person committing it or the person who is exposed to it. Harassment on the basis of an individual's sexual orientation, self-identified gender, perceived gender, or transgender status are all forms of prohibited sexual harassment. This policy applies to all persons involved in our operations, including coworkers, supervisors, managers, temporary or seasonal workers, agents, clients, vendors, guests, or any other third party interacting with the Company ("third parties") and prohibits proscribed harassing conduct by any team member or third party of the Company, including non-supervisory team members, supervisors and managers. If such harassment occurs on the Company's premises or is directed toward a team member or a third party interacting with the Company, the procedures in this policy should be followed.

Prohibition of Other Harassment

Federal and state laws define harassment as unwelcome visual, verbal or physical conduct on the basis of an individual's race, color, religion, sex, sexual orientation, gender identity or expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), marital status (including registered domestic partnership status), age, national origin or ancestry, physical or mental disability (including AIDS or HIV), medical condition, genetic characteristics, pregnancy (including childbirth, breastfeeding or any related medical condition), military and veteran status, an individual's perceived membership in a protected status, or any other legally protected status where such conduct has the purpose or effect of unreasonably interfering with a team member's work performance or creating an intimidating, hostile or offensive working environment.

The following is a partial list of harassing behaviors:

- Sending or forwarding letters, notes, e-mail messages, text messages, tweets, social media posts, or other communication of a derogatory or inappropriate nature in reference to a protected class.
- Visual conduct of a harassing nature including but not limited to leering, making gestures, displaying objects or pictures, cartoons, posters, internet web pages or screen savers in reference to a protected class.
- Verbal conduct of a harassing nature including but not limited to making or using derogatory comments, slurs, slang, or jokes in reference to a protected class.
- Physical conduct including touching, assaulting, impeding or blocking movements in reference to a protected class.

Prohibition of Discrimination on the Basis of Disability or Medical Condition

No program or activity administered by the Company shall exclude from participation, deny benefits to, or subject to discrimination any individual solely by reason of his or her disability or medical condition. Equal employment opportunity will be extended to qualified disabled persons in all aspects of the employment relationship, including recruitment, hiring, training, promotion, transfer, discipline, layoff, recall, and termination.

BJ's will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified disabled team member or applicant, unless undue hardship and/or a direct threat to the health and/or safety of the individual or others would result, in compliance with state and federal disability discrimination laws. BJ's will also consider requests for reasonable accommodations for medical conditions related to pregnancy, childbirth and lactation where supported by medical documentation and/or as required by applicable federal, state or local law. BJ's also will make reasonable accommodations with respect to requests related to religion or gender identity. The Company will not retaliate or otherwise discriminate against applicants or team members who request a reasonable accommodation for any of these reasons.

As part of its commitment to make reasonable accommodations, BJ's wishes to participate in a timely and good faith interactive process with any applicant or team member to determine what effective reasonable accommodations, if any, can be made in response to a request for accommodation. In some cases, this interactive process may be triggered without a request from the team member, such as when the Company receives notice from its own observation or another source that a medical impairment may be impacting the team member's ability to perform his or her essential job functions.

Applicants and team members are invited to identify reasonable accommodations that can be made to assist them in applying for and/or performing the essential functions of the position they seek or occupy. Team members should contact the Team Member Relations Department as soon as possible to request the opportunity to participate in a timely interactive process. The Company will evaluate information obtained from the team member, and possibly his or her health care provider or another appropriate health care provider, regarding any reported or apparent barriers or limitations, and will then work with the team member to identify possible accommodations, if any, that will help to eliminate or otherwise address the barrier(s) or limitation(s). If an identified accommodation is reasonable and will not impose an undue hardship on the Company and/or a direct threat to the health and/or safety of the individual or others, BJ's will generally make the accommodation, or it may propose another reasonable accommodation which may also be effective. Team members are expected to cooperate with this process by providing all necessary documentation supporting the need for accommodation, and being willing to consider alternative accommodations when applicable. By working together in good faith, BJ's and its team members will be in the best position to implement any reasonable accommodations that are appropriate and consistent with applicable law.

Age Discrimination and Harassment

BJ's prohibits any form of age discrimination and harassment. Age discrimination involves treating an applicant or team member less favorably because of his, her or their age. Federal law and certain state laws forbid age discrimination against individuals who are age 40 or older but do not protect individuals under the age of 40. Under these laws, it is not illegal for an employer to favor an older worker over a younger one, even if both individuals are age 40 or older. Some states have laws that protect younger workers from discrimination as well. BJ's policy prohibits discrimination on the basis of age in any aspect of employment, including hiring, firing, pay, job assignments, promotions, layoff, training, benefits, and any other term or condition of employment. An employment policy or practice that applies to everyone, regardless of age, violates BJ's prohibition against age discrimination and harassment if it has a negative impact on applicants or team members age 40 or older and is not based on a reasonable factor other than age.

It is also unlawful and against the Company's policy to harass a person because of his or her age. Harassment includes but is not limited to offensive or derogatory remarks about a person's age. The prohibition of harassment includes harassment by or towards any team member of the Company, including managers and hourly team members, as well as harassment by or towards guests, vendors or others doing business with the Company. Age discrimination and harassment are prohibited under our policy regardless of the age of the perpetrator, whether over 40 years of age or under 40 years of age.

Any retaliation based on an individual exercising any rights involving any complaint of age discrimination will not be tolerated.

Abusive Conduct Prevention

It is expected that our team members perform their jobs productively as assigned and in a manner that meets all of the Company's expectations during working times, and that our team members refrain from any malicious, patently offensive or abusive conduct including but not limited to conduct that a reasonable person would find offensive based on any of the protected characteristics described above. Examples of abusive conduct include repeated infliction of verbal abuse, such as the use of malicious, derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the intentional sabotage or undermining of a person's work performance.

Training and Reinforcement

All of our restaurant managers and Restaurant Support Center team members receive training on our Code of Integrity, Ethics & Conduct, our Policies Prohibiting Discrimination, Harassment and Retaliation, as well as our Respectful Workplace Culture, Fair and Equitable Hiring, and Eliminating Bias at the time of hire and annually thereafter. In addition, our hourly restaurant team members receive training on our Policies Prohibiting Discrimination, Harassment and Retaliation and our Principles of Integrity, Ethics & Conduct at time of hire and periodically thereafter.

Complaint Procedures

BJ's takes all reasonable steps to attempt to prevent harassment, discrimination, abusive conduct and/or retaliation from occurring in the workplace. All team members are encouraged to document and report any incidents involving discrimination, harassment, sexual assault, abusive conduct and/or retaliation as soon as possible.

Team members who believe they have been harassed, discriminated against, subjected to abusive conduct or retaliation in violation of this policy or any applicable law, including by persons doing business with or for the Company, should immediately provide a written or verbal complaint to a manager, an Area Vice President or Director of Operations, or a Vice President of Operations at BJ's. Team members are not required to make a complaint directly to their immediate supervisor.

Alternatively, team members may submit a written or verbal complaint to the:

- Team Member Relations Department at 7755 Center Ave., Suite 300, Huntington Beach, California 92647 or at (714) 500-2400 or
- Team Member Hotline at 1-877-510-0257 or www.bjsteammemberhotline.com at any time, day or night.

Complaints can be made anonymously via the Team Member Hotline.

The Complaint should include, where possible:

- Details of the incident(s)
- Names of individuals involved
- Names of any witnesses or other persons with knowledge of the incident(s)

If harassment occurs on the job by someone not employed by the Company, these procedures should be followed as if the harasser were a team member of the Company. Every manager who learns of any team member's concern about harassment or discrimination, whether in a formal complaint, an informal complaint or by observation, must immediately report the issues raised to his or her own manager, the Director of Operations or Area Vice President, and/or to the Team Member Relations Department. Any manager who suspects that the report has not been acted upon must report the complaint to the Team Member Relations Department.

The complaint procedure provides for a timely, thorough and objective investigation of any complaint, appropriate disciplinary action against anyone found to have engaged in prohibited activity, and appropriate remedies to deter any such conduct in the future. Everyone involved will be provided with due process, and a reasonable conclusion will be reached based on the evidence. The Company expects all team members to fully cooperate with any investigation conducted by the Company into a complaint of proscribed harassment, discrimination or retaliation, or regarding the alleged violation of any other Company policies. The Company will maintain confidentiality surrounding the investigation to the extent possible and to the extent permitted under applicable federal and state law.

Prohibition of Retaliation

BJ's also prohibits retaliation against any team member by another team member or by the Company for utilizing the complaint procedure in good faith, for threatening to utilize the complaint procedure, and/or for filing, testifying, assisting or participating in any manner in any investigation, proceeding, or hearing conducted by a federal or state enforcement agency. BJ's also prohibits retaliation against any team member for exercising their rights under federal and state leave and disability accommodation laws. Team members who believe they have been retaliated against in any way by another team member or member of management must contact the Team Member Relations Department promptly.

Any report of retaliation will be investigated in the same manner as the original complaint. A participant in an investigation will not be protected from disciplinary action by the Company if he/she, through the process, is found to have violated a Company policy or the law or to have engaged in inappropriate workplace conduct. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination.

Workplace Health and Safety

BJ's maintains a comprehensive health and safety program and policy that governs all aspects of our business and provides guidance on our interactions with each other, our guests, and our vendor partners. We continually focus on the health and safety of our team members and their workplace conditions and provide a robust safety training program. We are committed to meeting and exceeding industry standards as well as actively adapting to industry changes and advancements.

Child Labor, Forced Labor, and Human Trafficking

We support, follow, and abide by labor laws and regulations in the regions where we conduct business, including those that address child labor, forced labor, and human trafficking. With respect to child labor, BJ's follows the ILO labor standards outlined in Convention Nos. 138 and 182. We do not condone or accept any aspect of forced or compulsory labor and strictly prohibit team members from engaging in human-trafficking related activities.

Vendor Partners

We expect our vendor partners to share our commitment to respect human rights and abide by laws and regulations that address child labor, forced labor, and human trafficking. We request that they abide by our Policies Prohibiting Discrimination, Harassment and Retaliation and Code of Integrity, Ethics & Conduct as well.

Concerns, Remediation and Oversight

We are committed to providing effective resolution to remedy potential violations of human rights. Our Ethics Hotline is available 24 hours a day, seven days a week to team members, vendors, potential business partners, and guests. This mechanism offers a secure channel for anonymous reporting of suspected concerns or potential violations of our policies or the law. We support

individuals who, in good faith, provide information relating to reports of potential misconduct and prohibit threats or acts of retaliation in any circumstance.

We believe that every team member is responsible for respecting human rights. Our General Counsel and our Vice President, Human Resources and Team Member Relations oversee our Hotline and exercise oversight of policies and practices with respect to ethics matters. They provide updates to BJ's Senior Leadership Team and the Audit Committee of the Board of Directors, as needed.