



# Code of Business Conduct

## TABLE OF CONTENTS

### Message from the Portillo's Ethics Office

<b>THE INGREDIENTS OF OUR CODE</b> .....	<b>3</b>
<a href="#">What is the Code?</a> .....	3
<a href="#">The Code Applies to All of Us</a> .....	3
<a href="#">Additional Responsibilities for Managers</a> .....	4
<a href="#">Training and Education</a> .....	4
<b>WE MAKE ETHICAL DECISIONS</b> .....	<b>5</b>
<a href="#">Ethical Decision Tree</a> .....	6
<b>WE VOICE OUR CONCERNS WITHOUT FEAR</b> .....	<b>7</b>
<a href="#">Our Doors Are Always Open</a> .....	7
<a href="#">Portillo's Team Member Hotline</a> .....	7
<a href="#">Non-Retaliation Policy</a> .....	7
<a href="#">Cooperating with an Investigation</a> .....	8
<b>WE RESPECT OTHERS AND TREAT THEM LIKE FAMILY</b> .....	<b>9</b>
<a href="#">Belonging &amp; Inclusion</a> .....	9
<a href="#">Non-Discrimination, Workplace Harassment, and Bullying</a> .....	9
<b>WE PROMOTE A SAFE ENVIRONMENT</b> .....	<b>11</b>
<a href="#">Health and Safety</a> .....	11
<a href="#">Injury and Occupational Illness Prevention</a> .....	11
<a href="#">Substance Abuse — Illegal Drugs and Alcohol</a> .....	11
<a href="#">Preventing Violence in the Workplace</a> .....	12
<a href="#">Securing our Facilities</a> .....	12
<a href="#">Food Safety</a> .....	12
<b>WE MAINTAIN ACCURATE RECORDS AND PROTECT OUR ASSETS</b> .....	<b>14</b>
<a href="#">Wage and Hour Standards</a> .....	14
<a href="#">Selling with Integrity</a> .....	14
<a href="#">Loss Prevention and Fraud</a> .....	15
<a href="#">Protecting Physical Assets</a> .....	15
<a href="#">Retaining Company Records</a> .....	15
<a href="#">Books and Records</a> .....	16
<b>WE DO WHAT'S RIGHT FOR PORTILLO'S BY AVOIDING CONFLICTS</b> .....	<b>17</b>
<a href="#">Business Opportunities</a> .....	17
<a href="#">Personal and Work Relationships</a> .....	17

<a href="#"><u>Outside Employment</u></a> .....	18
<a href="#"><u>Personal and Competitive Activities</u></a> .....	18
<a href="#"><u>Financial Interests and Board Involvement</u></a> .....	19
<a href="#"><u>Gifts and Entertainment</u></a> .....	19
<a href="#"><u>Interactions with the Government</u></a> .....	20
<a href="#"><u>Political Activities</u></a> .....	20
<a href="#"><u>Anti-bribery / Anti-Corruption and FCPA</u></a> .....	21
<a href="#"><u>Compliance with Insider Trading Laws</u></a> .....	22
<a href="#"><u>Public Communications and Regulation FD</u></a> .....	22
<b>WE GUARD OUR INFORMATION AND THAT OF OTHERS</b> .....	<b>23</b>
<a href="#"><u>Confidential and Proprietary Information</u></a> .....	23
<a href="#"><u>Competitor Information and Intelligence</u></a> .....	24
<a href="#"><u>Guest and Team Member Privacy</u></a> .....	25
<b>WE USE OUR TECHNOLOGY RESOURCES RESPONSIBLY</b> .....	<b>26</b>
<a href="#"><u>Use of Technology Resources</u></a> .....	26
<a href="#"><u>Electronic Communications</u></a> .....	28
<a href="#"><u>Computer and Network Security</u></a> .....	28
<a href="#"><u>Intellectual Property and Copyright Laws</u></a> .....	28
<a href="#"><u>Artificial Intelligence</u></a> .....	29
<b>WE DELIVER THE RIGHT MESSAGE OUTSIDE OUR RESTAURANTS</b> .....	<b>31</b>
<a href="#"><u>Use of Social Media</u></a> .....	31
<a href="#"><u>Public Statements and Media Inquiries</u></a> .....	31
<a href="#"><u>Community Involvement and Charitable Contributions</u></a> .....	32
<b>RESOURCES</b> .....	<b>33</b>



To Our Portillo's Family –

Portillo's is an amazing company with an incredible history, and an outstanding record of success. From our humble beginnings in a trailer, we have a history of innovation and growth. But our commitment to Greatness – based on Quality, Service, Attitude and Cleanliness – has never wavered.

Still, it takes more than buildings to achieve Greatness as a company. Our success is a direct reflection of our Family of Team Members, and their obsession with being the best and working hard to continuously improve. Our company strategy is based on four key pillars: Run World-Class Operations, Innovate and Amplify the Portillo's Experience, Build Restaurants with Industry-Leading Returns, and Take Great Care of Our Teams. As part of how we "Take Great Care of Our Teams," we treat one another like family, and we work together to make everyone feel at home by treating others with respect. We step up when someone needs help, or, as we say, "we've got you." But we also function best when we have individual accountability and integrity.

To Portillo's, integrity means we are doing the right thing. We created our Code of Business Conduct to help our Team Members understand how to do the right thing when it comes to ethical business practices and Team Member conduct. The principles in the Code describe how we work together to support other Team Members, our guests, business partners and shareholders. Like our Purpose and Values, the Code also reinforces a sense of pride in what we do, knowing we're all maintaining high business, legal and ethical standards.

All Team Members should read the Code carefully and use it as a guide. It contains resources for ethical decision-making and provides examples of challenging situations you may experience while being part of our team. We can't anticipate every situation you may face — so whenever you are in doubt, you can seek help and advice. And if you see something that is wrong, speak up. Talk to your manager or supervisor, contact the People Team or the Legal Department, or raise your concerns through Portillo's Team Member (Ethics) Hotline at 844.635.4500. Speaking up allows us to address issues head-on and with urgency.

People are the Heart of Portillo's. Let's continue taking care of one another, our guests, and our communities all while staying true to and living our Values.

*- The Portillo's Ethics Office*

## THE INGREDIENTS OF OUR CODE

We believe that our people are the heart of Portillo's, and our team comes to life with the purpose and values we live and practice every day:

- Family
- Greatness
- Energy
- Fun

Our core values provide the ingredients for success at Portillo's. We demonstrate ethical conduct by living these core values every day — in our interactions with Team Members, guests, business partners and our communities. We expect all Team Members to treat other Team Members like Family, to aim for Greatness, to exhibit positive Energy while maintaining urgency and attention to detail and to keep it Fun for each other and our guests! We also expect all business partners who either work for Portillo's or on our behalf to operate with integrity, complying with all applicable laws and behaving in a manner that is consistent with the spirit of this Code.

We work together to make everyone feel at home and we move with energy and passion to deliver a memorable experience for our guests.

### What is the Code?

The Code is designed to help us align our daily actions and decisions with our core values as we pursue our mission — to relish the opportunity to create lifelong memories by igniting the senses with unrivaled food and experiences.

The Code is not intended to describe every policy or law that applies to us, nor does it address every situation you may face while being part of our team. Our Code is a roadmap of sorts, and it's a summary of the principles and expectations that guide ethical business conduct at Portillo's. Team Members are expected to use common sense and good judgment and seek guidance when they're unsure how to respond to a particular situation.

### The Code Applies to All of Us

The Code applies to all Team Members (including full-time and part-time Team Members and temporary or seasonal contractors) and our Board of Directors. Each of us must:

- Read, understand, and comply with the Code.
- Ask questions when we're not sure of the right thing to do.
- [Report](#) any actions that we know or suspect are violations of our Code, policies, laws, or regulations.
- Be aware that violations of our Code are serious. They may result in disciplinary action up to and including termination.

[Return to Table of Contents.](#)

### **Additional Responsibilities for Managers**

Team Members who manage or supervise others have a special obligation to lead by example when it comes to ethical conduct. Managers should demonstrate leadership and support to make sure their teams understand the Code and how to apply its principles within our daily work environment. Managers should:

- Talk about the Code with Team Members and reinforce our expectations about ethical conduct in the workplace.
- Encourage Team Members to come forward with questions or concerns and report alleged wrongdoing.
- Answer Team Member questions about the Code or direct them to where they can find the information they need.
- Take timely and appropriate action if they observe or receive reports of a violation of the Code, a policy or law, including taking appropriate corrective or disciplinary action when warranted.

### **Training and Education**

Training helps Team Members understand the Code and other policies that are important to our business. All new Team Members are required to take the Code of Business Conduct training. New Team Members are also required to acknowledge that they have read and understand the Code and will comply with it during their employment. Team Members in certain positions are also required to complete an annual Code of Business Conduct training course, which contains an annual compliance certification. The annual compliance certification reaffirms a Team Member's commitment to the Code and provides an opportunity for Team Members to report and disclose any potential violations or issues. Team Members will be notified of any training that is required based on their respective job responsibilities.

[Return to Table of Contents.](#)

## **WE MAKE ETHICAL DECISIONS**

### **Ethical Decision Tree**

We know that navigating difficult situations and knowing which choice is the ethical and right one isn't always easy. That's why Portillo's offers support and resources to help you feel confident in your choices. If you are not sure what to do in a particular situation, check our operating policies and procedures, our Team Member Handbook, and the guidelines included within the Code for an answer. If the answer still is not clear, use the decision tree below to help you determine the right course of action. If you still have questions, seek guidance from a Manager, the People Team, or the [Legal Department](#). The chart below is a guide for you to consider as you determine whether a behavior or action is ethical and how you should move forward.

[Return to Table of Contents.](#)

## WHEN IN DOUBT, ASK YOURSELF

### IS IT LEGAL?

**YES**

Go to next question and ask

**NO**

Stop

**NOT SURE**

Seek guidance

### IS IT CONSISTENT WITH OUR CORE VALUES AND PORTILLO'S POLICY?

**YES**

Go to next question and ask

**NO**

Stop

**NOT SURE**

Seek guidance

### WILL IT MAINTAIN PORTILLO'S GOOD REPUTATION?

**YES**

Go to next question and ask

**NO**

Stop

**NOT SURE**

Seek guidance

### WOULD IT HAVE A POSITIVE EFFECT ON PORTILLO'S IF ALL TEAM MEMBERS DID IT?

**YES**

Go to next question and ask

**NO**

Stop

**NOT SURE**

Seek guidance

### WOULD YOU FEEL COMFORTABLE DESCRIBING YOUR ACTIONS IN THIS SITUATION TO YOUR MANAGER OR A LEADER?

**YES**

Go to next question and ask

**NO**

Stop

**NOT SURE**

Seek guidance

### WOULD I FEEL COMFORTABLE EXPLAINING IT TO MY FAMILY AND FRIENDS?

**YES**

Go to next question and ask

**NO**

Stop

**NOT SURE**

Seek guidance

### WOULD I WANT IT ON THE FRONT PAGE OF TOMORROW'S NEWSPAPER?

**YES**

Go to next question and ask

**NO**

Stop

**NOT SURE**

Seek guidance

**THE DECISION TO MOVE FORWARD APPEARS APPROPRIATE.**

[Return to Table of Contents.](#)

## **WE VOICE OUR CONCERNS WITHOUT FEAR**

At Portillo's, we have an open-door policy that encourages us to present ideas, raise concerns and ask questions. Every Team Member should feel comfortable speaking up, particularly with respect to ethical or legal concerns. In fact, our Code requires every Team Member to report issues that they genuinely believe may violate the Code, our policies or the law. We all have a duty to help maintain our high standards and doing the right thing may mean reporting issues or concerns.

### **Our Doors Are Always Open**

Many potential Code violations can be avoided by asking for guidance before acting. When confronted with a tricky ethical situation, you are encouraged to discuss it first with your supervisor, who is often best able to resolve the issue. If your problem isn't resolved, or you feel uncomfortable discussing your concern with your manager, feel free to contact the next level of management or any other manager. Please know that you can contact the People Team directly at any time.

### **Portillo's Team Member Hotline**

Many of your questions can be addressed by speaking with your manager, using [myportillos.com](http://myportillos.com), or calling the Team Member (Ethics) Hotline toll-free at 844.635.4500. In certain cases, you may feel uncomfortable discussing your concern with someone within Portillo's or, after seeking advice, you may feel your concern requires additional attention by the Company. Regardless of the circumstance, you can contact Portillo's Team Member (Ethics) Hotline, which is available 24 hours a day, 7 days a week at 844.635.4500. The Hotline is a confidential reporting option administered by an independent third-party reporting service. Your concern will be documented by a trained interview specialist and will be given to an appropriate individual within Portillo's, who will assess, investigate and address the matter. You have the option to remain anonymous when you use this service, and if you choose to provide your name, your confidentiality will be protected to the extent reasonably possible. You can also report any concerns online at [portillos.ethicspoint.com](http://portillos.ethicspoint.com).

### **Non-Retaliation Policy**

We value the information our Team Members provide and encourage them to raise any concerns or questions they may have without fear of punishment or retaliation. We do not tolerate retaliation against a Team Member who raises concerns or questions about a potential violation of the Portillo's Code or any Portillo's policy that they reasonably believe happened or that they experienced. We do, however, expect our Team Members to act honestly and in good faith when raising concerns or reporting issues. Intentionally making false allegations or reports knowingly made in bad faith may lead to disciplinary action.

If you believe you or anyone else in the Company is experiencing retaliation, you should report it promptly.

[Return to Table of Contents.](#)

Retaliation against anyone who raises a concern in good faith, or who assists the Company, the Board of Directors, the Audit Committee of the Board of Directors, or any governmental, regulatory or law enforcement body in reviewing or otherwise helping to resolve a concern, is prohibited and is a violation of this Code. If you believe someone has retaliated against you, you should immediately report it to your manager, the People Team, the Ethics Office, or any of the other resources listed in this Code. You may also report retaliation through the Team Member Hotline referenced above in the Portillo's Team Member Hotline section. Any person who retaliates against another individual for making any report pursuant to our Code will be subject to disciplinary action up to and including termination.

We encourage you to resolve issues through the methods outlined in this Code or through other channels of the Company. However, nothing in this Code prohibits or interferes with your ability, without notice to or authorization of the Company, to communicate in good faith with any governmental agency for the purpose of reporting a possible violation of law, or to participate in any investigation or proceeding that may be conducted by any governmental agency, including providing documents or other information.

Any use of these reporting procedures in bad faith or in a false or frivolous manner will be considered a violation of this Code. Please also see our Whistleblower Policy.

### **Cooperating with an Investigation**

Team Members are expected to participate in and cooperate with any investigation into alleged violations of our Code, laws, policies, and procedures, and to be truthful and honest during any investigation. This includes situations where a Team Member is an involved party, a witness, or is asked to provide information as part of an investigation. Any Team Member who refuses to cooperate with an investigation may be subject to disciplinary action up to and including termination.

To preserve the integrity of an investigation and a Team Member's right to privacy, investigations are generally considered confidential company matters. We ask that Team Members avoid discussing any aspect of an investigation, even the fact that an investigation is being conducted, with other Team Members or individuals outside of the Company, unless such discussions are otherwise permitted or required by law.

[Return to Table of Contents.](#)

## **WE RESPECT OTHERS AND TREAT THEM LIKE FAMILY**

At Portillo's, we aim to treat all people — Team Members, guests, business partners and any others we encounter — like family, with fairness, dignity, and respect.

Our diversity of experience and background is an important asset and we gain a competitive advantage by attracting, retaining, and developing the best talent from our communities. We believe that valuing individuals and what makes them unique lets us make a personal connection with our Team Members and the communities we serve. We are committed to creating and maintaining a work atmosphere where people feel included and that they belong, and where we respect each other's talents, abilities, experiences, and opinions.

### **Belonging & Inclusion**

Portillo's actively creates and promotes an environment that is inclusive of all people and their abilities, strengths, and differences. We respect differences in each other, our guests and suppliers, and everyone else. Our goal is to create lifelong memories in an environment where everyone feels welcome and at home.

### **Non-Discrimination, Workplace Harassment, and Bullying**

Portillo's is committed to providing equal opportunities and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status, or other characteristic protected by law. The Company also prohibits harassment and bullying based on these characteristics in any form, whether physical or verbal and regardless of whether it's done by supervisors, non-supervisory Team Members, or non-Team Members. Similarly, the Company does not tolerate any form of disrespectful, hostile, violent, intimidating, threatening, or harassing conduct. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive or racially degrading objects or pictures.

Discrimination and harassment can take many forms, including:

- Unwelcome remarks, jokes, gestures, or physical contact (including sexual advances)
- The display or circulation of offensive, derogatory, or sexually explicit pictures or other materials, regardless of the manner in which it is shared
- Offensive or derogatory jokes or comments (explicit or by innuendo), including racial, ethnic, or sexual slurs
- Verbal or physical abuse or threats

Any actions, words, jokes, or comments based on an individual's race, color, age, religion, gender identity or expression, sexual orientation, marital status, veteran status, national origin, disability, pregnancy, or any other legally protected status will not be tolerated.

[Return to Table of Contents.](#)

Our commitment to these principles applies to our daily interactions with Team Members, guests, and our business partners, and extends to all Company-sponsored and work-related activities, including those outside the workplace. If you have a good faith belief that you or someone else at Portillo's has been harassed or discriminated against, you must report it to the People Team immediately.

[Return to Table of Contents.](#)

## **WE PROMOTE A SAFE ENVIRONMENT**

We are in the hospitality industry and have an important responsibility to provide a safe and healthy environment for our Team Members who work in our restaurants and for guests who visit our restaurants. Maintaining a safe and healthy environment is vital to our mission of creating lifelong memories.

### **Health and Safety**

Portillo's is committed to complying with all relevant health and safety laws, as well as conducting business in a manner that protects the safety of our Team Members. All Team Members must comply with all applicable health and safety laws, regulations, and policies relevant to their positions. Concerns about unsafe conditions or tasks that present a risk of injury must be reported immediately to a supervisor or the People Team.

### **Injury and Occupational Illness Prevention**

Our Company makes every effort to comply with all health and safety laws that apply to us. We expect all Team Members to follow all operating policies and procedures designed to prevent workplace injuries and occupational illnesses. Team Members are also responsible for reporting any unsafe conditions and immediately reporting any accidents, injuries or illnesses required under our Illness and Injury Reporting Policy.

### **Substance Abuse — Illegal Drugs and Alcohol**

Portillo's is a drug-free workplace, and it is our responsibility to maintain a safe and healthy environment. The Company prohibits the manufacturing, distribution, possession, use and purchase or sale of controlled substances on its premises, including parking lots. Controlled substances include:

- Illegal drugs and narcotics
- Prescription drugs obtained or used in a manner unauthorized by or without a valid prescription
- Other unlawful substances or materials

Team Members who are under the influence of controlled substances or alcohol while working can pose a serious safety and health risk to themselves and others in the workplace. Team Members may not report for work or remain on duty while under the influence of alcohol or controlled substances. Reasonable alcohol use is permitted at company-sponsored events or other approved times and places, and Team Members are expected to exercise discretion and good judgment in such situations.

[Return to Table of Contents.](#)

## Preventing Violence in the Workplace<sup>1</sup>

The safety and security of Team Members and guests is important. The Company does not tolerate workplace violence of any kind, and this applies to all Team Members and employees of other entities working in our restaurants, plants, or the Restaurant Support Center. Team Members must report any acts or threats of violence, including:

- intimidation or coercion,
- hostile behavior, or
- unauthorized possession of weapons on company property

In cases of imminent danger, or if a situation warrants it, Team Members should address the situation by following emergency response plans to ensure that immediate assistance is obtained (including contacting 911 or local law enforcement, if appropriate).

## Securing our Facilities

Our restaurants, plants and Restaurant Support Center should be appropriately secured to protect our guests and Team Members. If a security issue arises, Team Members should help to protect Portillo's by staying alert. If an individual or group attempts to gain access without proper authorization, speak up. By observing and enforcing our physical access rules at our restaurants, plants, and Restaurant Support Center, we can avoid potentially problematic situations with unauthorized individuals entering our facilities.

## Food Quality and Safety

The Company is committed to serving our guests delicious, high-quality, craveable food that meets or exceeds our expectations and industry standards. Every Team Member plays a role in upholding our reputation for excellence.

All food preparation, handling, storage, and service must comply with local, state, and federal food safety regulations, as well as company policies and standard operating procedures. Team Members must follow proper hygiene practices, maintain clean and sanitary work areas, and use approved methods for cooking, cooling, labeling, and storing food.

[Return to Table of Contents.](#)

---

<sup>1</sup> Portillo's does not permit any Team Member to have weapons of any kind on Company property or in vehicles, while on the job or while off-site on Company business. This is true even if legal permits to carry weapons have been obtained. The only exception to this policy applies to security personnel who are specifically authorized by Company management to carry weapons within the scope of their job.

We do not take shortcuts when it comes to food safety or quality. If a Team Member sees or suspects any unsafe or unsanitary condition, improper food handling, equipment malfunction, or any issue that could compromise food safety or quality, they must take immediate action. This includes:

- Stopping any unsafe practices;
- Alerting a supervisor, manager, or the Food Safety Team right away; and
- Reporting the issue through the Company's safety reporting process or Team Member Hotline.

Prompt reporting of concerns about food safety or quality helps protect our guests, our Team Members, and our brand. Food quality and safety is a responsibility we all share and we must take it seriously.

[Return to Table of Contents.](#)

## **WE MAINTAIN ACCURATE RECORDS AND PROTECT OUR ASSETS**

As in all other aspects of our business, we expect our Team Members to act with honesty and integrity. We are committed to following all applicable wage and hour laws and regulations.

Theft, fraud and false or misleading recordkeeping are serious concerns, because they can impact our Company's reputation and financial performance. We all have a responsibility to protect company assets and to ensure that our books and records fairly and accurately reflect business transactions.

### **Wage and Hour**

To make sure all work performed for Portillo's is compensated correctly, hourly Team Members must report and record time accurately, per local requirements.

Portillo's follows applicable national, state, and local laws and regulations that govern pay rates, overtime, work hours, meals, and rest breaks. We all have a very important obligation to keep accurate records regarding our work time. Team Members may not instruct another Team Member to falsify or fail to report any time worked, and no Team Member is ever permitted to work off-the-clock. Overtime-eligible, hourly Team Members must report all time worked. Additionally, managers responsible for reviewing time and labor records may not make any unauthorized edits that would alter the accuracy of those time and labor records. Finally, we must comply with all Company policies regarding meal and rest period requirements. Any potential violations of our wage and hour standards should be reported immediately.

When employing Team Members under the age of 18, managers must comply with all Company policies and legally-required limitations on minimum hiring age and hours and tasks performed by these Team Members to ensure any work performed does not interfere with the Team Member's education, health, safety and mental or physical development.

Team Members who work at Portillo's have the freedom to associate with any labor union of their choosing and Portillo's will honor any collective bargaining agreement negotiated in good faith between the Company and a Team Member's chosen union representative.

### **Selling with Integrity**

Our unrivaled food is one of our biggest assets. We should understand that any misuse or abuse associated with the pricing of our food erodes our profitability and results in a loss. Food promotions and discounts should be used only in accordance with Company policy. Our guests rely on us to be transparent and truthful in our offerings, and we take that commitment seriously.

[Return to Table of Contents.](#)

We all want to succeed in reaching our performance goals, and we advocate healthy and fair competition between our restaurants and with our competitors. However, playing by the rules and maintaining our integrity during sales transactions is necessary to succeed in the right way.

## Loss Prevention and Fraud

We must all be vigilant in avoiding, identifying, and reporting fraudulent activities or activities we suspect may involve fraud. Fraudulent activities are any intentional acts or omissions committed that may cause loss or damage to Portillo's or our partners. Fraud may include gaining advantage for oneself and/or others. Fraud can also occur without a personal gain or monetary advantage. Fraudulent activity not only violates the Code and causes loss to the Company but can also result in criminal prosecution.

## Protecting Physical Assets

Team Members have a responsibility to protect the physical assets of the Company from theft, loss, waste, abuse, or misappropriation. Physical assets may include items such as equipment, inventory, supplies and the facilities themselves. If a Team Member knows or suspects any of the Company's physical assets have been damaged, stolen or destroyed, they should immediately contact their supervisor or the Asset Protection Department.

## Retaining Company Records

In addition to ensuring Company records accurately and fairly reflect our activities and transactions, we have an obligation to retain those records, as required by our policies and applicable law. The Company maintains a records retention policy that addresses the proper storage, maintenance, retention, and disposal of company records. Each Team Member is responsible for complying with these policies and may not inappropriately destroy, alter, or conceal any record that should be retained, regardless of the format or the media.

From time to time, the Company may be involved in litigation, investigations, inquiries, or audits that require us to indefinitely preserve certain documents and records. When this happens, the [Legal Department](#) will provide instruction to the appropriate departments and individuals to indefinitely retain certain records. Such records cannot be destroyed without prior approval of the [Legal Department](#).

[Return to Table of Contents.](#)

If you are notified of a litigation hold by the Legal Department, do not discard any documents or records involving the named subject matter. The documents must be retained in their original format (i.e., printing and saving electronic records is not sufficient). You will be informed of specific types of documents that are relevant to the lawsuit or investigation and that must be retained for these purposes. Until that point, do not discard any document on the subject matter. If you personally become aware that the Company may be involved in a lawsuit or government investigation, please immediately notify the [Legal Department](#), including the Company's General Counsel, to make sure a litigation hold is issued in a timely fashion.

For more information, refer to the Records Retention Policy, which can be obtained by visiting Portillo's Connect or contacting the Legal Department.

### **Books and Records**

All Team Members must ensure the accuracy and integrity of Portillo's corporate records. This includes reliability and accuracy of books and records, as well as full, fair, accurate, timely and understandable disclosure.

Portillo's books of account, financial statements, and records should be maintained in accordance with legal requirements and the Generally Accepted Accounting Principles ("GAAP"). All of Portillo's assets and liabilities should be properly recorded in its books, and revenues and costs must be recorded in the right time periods. Concerns regarding accounting, internal accounting controls or auditing matters should be promptly reported through the Portillo's Team Member (Ethics) Hotline at 844.635.4500 or online at [portillos.ethicspoint.com](http://portillos.ethicspoint.com). Reports may be made anonymously and will be treated in a confidential manner to the extent possible. Reports can also be made directly to the Company's Audit Committee of the Board of Directors (see Resources guide at the end of this Code).

[Return to Table of Contents.](#)

## **WE DO WHAT'S RIGHT FOR PORTILLO'S BY AVOIDING CONFLICTS**

There are times when the Company's interests and your personal interests may not align. A conflict of interest is just what the name suggests — a situation that creates or appears to create a conflict between a Team Member's personal interests and Portillo's interests. Such conflicts can interfere with a Team Member's performance of his or her job duties and in doing the right thing for Portillo's.

Some examples of possible conflicts are explained below; however, it is difficult to identify every situation where a conflict could arise or when it might appear to others that a conflict exists. Conflicts can result from many types of relationships, arrangements, or situations. If you have any questions or are concerned about a potential conflict of interest, whether it involves you or another Team Member, do the right thing and either seek guidance or report it.

### **Business Opportunities**

Team Members have an obligation to advance the Company's interests when they have an opportunity to do so. Team Members who discover or are presented with a business opportunity through Company property or information, or because of their position with the Company, must first present the business opportunity to the Company before pursuing the opportunity in their individual capacity.

Team Members may not use/do the following for personal gain:

- Company property
- Information learned from his/her position
- Compete with the Company while employed by Portillo's

If an opportunity is potentially going to be pursued, Team Members must disclose to an immediate supervisor the terms and conditions of each business opportunity covered by this Code. The supervisor will contact the General Counsel and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company decides not to pursue the business opportunity, the individual may then pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

### **Personal and Work Relationships**

Portillo's strives to provide a work environment that is collegial, respectful, and productive. This policy establishes rules for the conduct of personal relationships between Team Members, including supervisory personnel, in order to prevent conflicts and maintain a productive and friendly work environment.

[Return to Table of Contents.](#)

Mixing personal relationships with work relationships can create special challenges in the workplace. To ensure objectivity and to prevent a potential conflict of interest, Team Members may not directly supervise or be in a supervisory position of another Team Member with whom they share a close personal relationship. A “personal relationship” is a relationship between individuals who have or have had a continuing relationship of a familial, intimate or romantic nature. This includes an immediate family member, such as a spouse, parent, sibling, child or a close friend or someone with whom a Team Member has a romantic relationship or a shared financial interest, such as a personal business investment.

The same principles apply to our interactions with business partners and vendors. If a business partner or vendor employs someone that has a close personal relationship with a Team Member, then that Team Member may not be involved.

### Outside Employment

All of us have a primary duty to advance the interests of Portillo’s. Outside employment and other business arrangements must not interfere with this obligation. Team Members and officers are expected to disclose the details of any non-Company activity for which they receive compensation.

A conflict of interest may also arise if:

- A Team Member’s outside employment activities take so much time that it interferes with their duties and responsibilities to Portillo’s.
- A Team Member uses Company property or resources to support their outside employment.
- There is a risk the outside employment may cause a Team Member to disclose confidential or proprietary information of Portillo’s.

### Personal and Competitive Activities

Team Members are not permitted to take advantage of opportunities through the use of Company resources, including property, information, or employment, for personal gain. This includes Team Members engaging in personal activities deemed to be competitive with Portillo’s.

Examples include but are not limited to:

- Soliciting or selling services or products while on Company premises.
- Conducting competitive services off Company premises for personal gain, unless those services are related to outside employment approved by the Company.
- Utilizing Portillo’s name, brand, intellectual property, or a Team Member’s affiliation with the Company to promote personal or competitive interests.
- Using Company discounts for third parties in return for anything of value for personal, non-business use or in a manner not authorized by Company policy.

[Return to Table of Contents.](#)

## Financial Interests and Board Involvement

Any outside financial ownership interest or serving on any board of directors by a Team Member may create a conflict if that interest or involvement is with any of our vendors, business partners or competitors. Any such interests or relationships must be disclosed in a timely manner to the [Legal Department](#) and may continue only with Company approval.

## Gifts and Entertainment

Exchanging business courtesies such as meals, entertainment, promotional gifts, and other items is often an important part of building strong business relationships and creating goodwill. However, they must never affect our judgment or inappropriately influence our business decisions.

Permissible gifts and entertainment generally include those that are unsolicited, come with no strings attached and are reasonable in value and frequency. Individual items with a dollar value of more than \$250 (or \$500 per calendar year from a single source) should be disclosed on the Company's Gift Reporting Form (available on Portillo's Connect) and approved by your immediate supervisor. A gift or favor should never be accepted or given if it may create a sense of obligation, compromise your professional judgment, or create the appearance of doing so.

Situations that are **never permissible** and should be avoided include:

- Offering or accepting any gifts or entertainment as part of or during a business negotiation or competitive bidding process
- Offering or accepting a gift or entertainment in the form of cash or a cash equivalent (such as a gift card), regardless of value
- Participating in any business entertainment activity that would violate the law or negatively impact the Company's reputation if it is publicly disclosed

A gift of money should never be given or accepted by Team Members; however, Team Members may accept customary tips for service well done. Managers are not permitted to accept tips at any time, regardless of circumstance.

A gift of nominal value may be given or accepted if it is common business courtesy, such as a shake sample, a soda, or a similar token.

Trading items of value with other business, including shops and restaurants, is strictly prohibited. Portillo's prohibits offering, giving, soliciting, or receiving any form of "bribe" or trade. There are serious penalties for engaging in this conduct.

The above principles apply to Team Members either receiving or providing a gift or entertainment and extend to exchanges between a Team Member's immediate family member and a third party.

[Return to Table of Contents.](#)

## Interactions with the Government

Portillo's policy is to deal honestly and fairly with governmental authorities, including regulatory bodies like state and federal departments of agricultural and agencies that regulate, monitor, and inspect food establishments and food products.

Payments made by or on behalf of Portillo's to any government official must be lawful under the laws of the United States. It is against Portillo's policy and may be a breach of law to offer or make a payment or gift of any kind to facilitate a local process or to influence a local governmental official.

If a Team Member's job responsibilities include interacting with the government, he or she is expected to understand and comply with the special laws, rules and regulations that apply to their particular job as well as with any applicable standard operating procedures that the Company has in place. If you have any doubt about whether a course of action is lawful, Team Members are to seek advice immediately from their supervisor and the [Legal Department](#), up to and including the General Counsel.

Additionally, General Counsel approval is required for any work that involves lobbying communication with any member or employee of a legislative body or with any government official or employee. These work activities include meetings with legislators or members of their staffs or with senior executive branch officials on Portillo's behalf. Preparation, research, and other background activities that are done in support of lobbying communication are also covered even if a decision is made not to have the communication. If you have any doubt about whether a given work activity would be covered by this provision, you must seek advice immediately from your supervisor and the [Legal Department](#), up to and including the General Counsel.

## Political Activities

The Company is committed to following all federal, state, and local laws related to elections, campaign contributions and lobbying activities. Company funds or assets may not be used to make a political contribution to any political party or candidate unless prior written approval has been authorized by the Board of Directors. The Company will not reimburse individuals for personal political contributions.

Team Members may participate in personal political activity and have a right to support candidates and issues that reflect their individual beliefs and commitments. However, any personal political activities must be conducted on your own time and using your own resources. You cannot promote any personal political or personal view or beliefs (including by posting or distributing notices or other materials) on or around Portillo's premises. You also may not indicate or suggest that you speak for Portillo's or that the Company endorses your views. This does not prohibit Team Members from engaging in protected, concerted activity under the National Labor Relations Act.

[Return to Table of Contents.](#)

## Anti-bribery / Anti-Corruption and FCPA

Portillo's succeeds in business based on the quality of our services, products, and people, and not on the basis of illegal bribes. The Company prohibits all forms of bribes, kickbacks, and other unlawful payments, including those offered or made to a government official or political party.

Team Members should be familiar with, and are expected to comply with, the U.S. Foreign Corrupt Practices Act (the "FCPA") and other anti-corruption laws that prohibit any payment or offer of payment to a "foreign official" for the purpose of influencing that official to assist in obtaining or retaining business for a company. In general, the FCPA prohibits corrupt payments or bribes for the purpose of obtaining or keeping business or improperly influencing government action to the following:

- All non-U.S. government officials
- Political parties
- Political candidates
- An intermediary (a third-party agent of the Company, if there is reason to believe that the payment will be used indirectly for a prohibited payment to foreign officials)

These requirements apply to every one of our Team Members, as well as any third parties working on behalf of Portillo's. This law carries significant criminal and civil penalties for noncompliance. The consequences of failing to comply with the FCPA are very serious and violations by a Company Team Member can result in millions of dollars in fines against the Company and can subject the Team Member to criminal prosecution, criminal fines, and imprisonment, as well as disciplinary action by the Company, including dismissal.

Any transaction, no matter how seemingly small, that might give rise to a violation of the FCPA, or this policy, must promptly be reported to the [Legal Department](#). Such reports may also be made through the Portillo's Team Member Hotline (whistleblower reporting system) at 844.635.4500 or online at [portillos.ethicspoint.com](http://portillos.ethicspoint.com). All reports will be treated as confidential to the extent possible and will be shared with authorized individuals on a need-to-know basis. As long as a report is made honestly and in good faith, the Company will not take adverse action against any person based on making such a report. Team Members failing to report known or suspected wrongdoing may, by itself, subject that Team Member to disciplinary action.

Team Members who have any questions regarding interactions with government officials or employees should contact the [Legal Department](#) for advice.

[Return to Table of Contents.](#)

## Compliance with Insider Trading Laws

As a Team Member, you may become aware of significant and confidential information about Portillo's business, often called "Material Non-Public Information."

Consistent with the Portillo's Insider Trading Compliance Policy and the law, the Company's officers, other Team Members, and members of the Board of Directors, and others who have a "personal relationship" with them, are prohibited from trading in Portillo's stock or other securities while they have Material Non-Public Information about the Company.

In addition, the Company's officers, other Team Members, and directors are prohibited from:

- recommending
- "tipping off"
- or suggesting that anyone else buy or sell the Company's stock or other securities based on Material Non-Public Information.

Team Members and directors who obtain Material Non-Public Information about another company while working for the Company are prohibited from trading in the stock or securities of the other company while in possession of such information. Team Members and directors may not "tip off" others to trade based on such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment. Carefully read and observe our Insider Trading Compliance Policy, which can be found on Portillo's Connect, as the policy is updated from time to time. Please contact the [General Counsel](#) for a copy of the Insider Trading Compliance Policy or with any questions about insider trading laws.

## Public Communications and Regulation FD

Portillo's highly values its credibility and reputation in the community. What is written or said about Portillo's in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely and accurate information in response to public requests (from media, analysts, etc.), in a way that meets our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data

As part of its public communications, the Company is required to comply with a rule under the federal securities laws referred to as Regulation FD (which stands for "fair disclosure"). Regulation FD provides that, when Material Non-Public Information is disclosed about the Company to securities market professionals or stockholders (where it is reasonably foreseeable that the stockholders will trade on the information), we must also disclose the information to the public. "Securities market professionals" generally include analysts, institutional investors, and other investment advisors.

For more information, refer to the Regulation FD Policy which is located on <https://investors.portillos.com/> or by contacting the [Legal Department](#).

[Return to Table of Contents.](#)

## WE GUARD OUR INFORMATION AND THAT OF OTHERS

We operate in an environment that is becoming more competitive and technologically oriented, creating more opportunities to rapidly receive and share information. It is our responsibility to protect confidential information — whether about Portillo’s or its Team Members, suppliers, or competitors — against theft, loss, unauthorized access, disclosure, or misuse.

### Confidential and Proprietary Information

Team Members may have access to confidential and proprietary Company information as part of their regular job duties at Portillo’s. Such information is generally not known to the public and could be useful to our competitors or other third parties. We are committed to and have a duty to protect that information.

Portillo’s confidential information should be used only for Company purposes and should not be disclosed to anyone outside of the Company.

Confidential information includes:

- Supplier information
- Recipes
- Formulas
- Business strategy and marketing plans
- Development, construction and restaurant expansion plans
- Internal Company communications
- Financial and operations performance details
- Existing and future product information

Even within the Company, only those individuals who truly need to know the information to conduct their business should have access to confidential information. If you leave the Company, you must return all Company materials and property, as well as any copies you may have.

Team Members with access to confidential or proprietary information should only share it with other Team Members who have a legitimate business need to know such information in performing their job duties.

Confidential materials should be clearly marked as confidential, stored in a secure place, and not be left out where others can see them. Additionally, confidential information should not be discussed where others may overhear the conversation.

[Return to Table of Contents.](#)

Confidential or proprietary information must never be shared with people outside Portillo's unless authorized and pursuant to a legitimate business purpose. It is important to understand that our obligation to preserve the confidentiality of such information continues if and after we leave Portillo's. If you have a business need to share the Company's confidential information, you should partner with the [Legal Department](#) to ensure that appropriate safeguards, such as a signed confidentiality agreement, are in place.

Nothing in this Code restricts any current or former Team Member from communicating, cooperating or filing a complaint with any U.S. federal, state or local governmental or law enforcement branch, agency or entity with respect to possible violations of any U.S. federal, state or local law or regulation. Nothing in this Code prohibits any current or former Team Member from making disclosures to any such entity that are protected under applicable whistleblower provisions, provided that (i) in each case such communications and disclosures are consistent with applicable law and (ii) the information subject to such disclosure was not obtained by the current or former Team Member through a communication that was subject to the attorney-client privilege, unless such disclosure of that information would otherwise be permitted by an attorney pursuant to 17 CFR 205.3(d)(2), applicable state attorney conduct rules, or otherwise.

### **Competitor Information and Intelligence**

We aim to be the leader in the food and hospitality industry, but it is in our best interest to compete with our peers on a fair and level playing field, with our behavior firmly committed to our core values. We treat our competitors with respect and do not make false, misleading, or disparaging remarks to others related to our competitors, their products, or services.

We also protect our competitor's confidential and proprietary information with the same care we give our own. We are committed to promoting free and fair competition and complying with any antitrust and fair competition laws to ensure a fair marketplace. We may obtain information about our competitors only through legal and ethical means. Generally, it is appropriate to gather competitive information from public sources, available information at industry events, as well as company-sponsored surveys and competitive research. We should not acquire information via improper means, including stealing, soliciting, or accepting disclosures of confidential or proprietary information by a competitor's past or present Team Members. This principle also applies to Team Members who may have a prior employment relationship with a competitor. These Team Members should refrain from offering or providing information that is confidential or proprietary to their former employer.

[Return to Table of Contents.](#)

Here are some basic rules to follow:

- Do not bring any material from prior employers to Portillo's.
- Do not accept or use anyone else's confidential information (or agree to maintain anyone's information in confidence).
- Do not solicit confidential information from another company's present or former Team Members or suppliers.
- Do not engage in espionage; be transparent in obtaining information about the marketplace.

### **Guest and Team Member Privacy**

Our guests and Team Members entrust Portillo's with their personal information, such as phone number, email, address, date of birth, etc., so we can better serve them, and honoring that trust is fundamental to ensuring a great Team Member and guest experience.

Guests and Team Member records are confidential and should be used only for legitimate business purposes by Team Members with a business "need to know." We must not use any information for non-work-related purposes or disclose personal information to any unauthorized person inside or outside of Portillo's. Every Team Member is responsible for knowing how to protect these records and the appropriate methods for handling, storing, and transmitting such information. Team Members are also responsible for protecting the personal information of any third parties to which the Team Members may have access. In the event that Team Members learn about a known or suspected data incident/data breach, they should immediately report the facts and background to the Information Security Team, the Chief Information Officer, and/or the Legal Department.

Portillo's [Privacy Policies](#) contained on our website inform our guests about what information is collected about them and how it is used. Guests are given the ability to limit certain uses of their information and to determine how our Company communicates with them. To ensure a great guest experience, we should follow and respect these choices.

[Return to Table of Contents.](#)

## **WE USE OUR TECHNOLOGY RESOURCES RESPONSIBLY**

Portillo's is committed to making sure our Team Members have the resources necessary to perform their jobs effectively and efficiently. This includes supplying Team Members with various technological resources, including but not limited to:

- mobile devices
- computers
- computer network system
- email
- internet and intranet access
- phone systems
- printers
- fax machines

Team Members are responsible for properly using, caring for and protecting these resources.

### **Use of Technology Resources**

Company resources provided to Team Members remain the property of Portillo's at all times. As a general rule, unless prohibited by law, these resources should only be used by Team Members for Company business. We understand that from time to time, Team Members will use the Company's electronic communications systems for personal use. The Company reserves the right to monitor or review all data and information contained on any Team Member's or officer's computer, or other electronic device issued by the Company. Misuse of the Company's electronic message communication systems is prohibited and may result in corrective action up to and including job termination.

Misuse includes but is not limited to:

- Accessing or distributing pornographic or otherwise potentially offensive or harassing information.
- Accessing or distributing materials containing offensive language, vulgarities, obscenities, sexually explicit language, derogatory and defamatory remarks or discriminatory or harassing statements.
- Accessing or distributing confidential Team Member, customer, or business information for non-work-related purposes.

[Return to Table of Contents.](#)

- Sending copies of documents in violation of copyright laws.
- Accessing or attempting to access another Team Member's electronic communication system without the written consent of authorized Company personnel.
- Use or misuse resulting in violation of a law.
- Unauthorized intentional destruction or modification of data records.

For more information, refer to the Company Information Technology and the Security Policies, which can be obtained by visiting Portillo's Connect or contacting the People Team.

[Return to Table of Contents.](#)

## **Electronic Communications**

Sending inappropriate messages or email (including harassing, threatening or discriminatory messages) or using our tools in an inappropriate manner is not tolerated. Team Members should also be careful when using email and avoid careless or inaccurate statements that could be misunderstood. Team Members should have no expectation of privacy in their use of company-owned equipment, computers, or technology supplies. The Company may search, monitor, and review any of its information systems (including internet activity) at any time in accordance with applicable law. Electronic communications sent or received by Team Members on a Company-provided email address are the exclusive property of the Company.

## **Computer and Network Security**

Our computer systems, network and electronic data are an essential part of our business. Every Team Member should do their part to safeguard the integrity and confidentiality of our computer systems, the Portillo's networks, and the electronic data processed and stored within them.

Login credentials (such as username and password) are used to uniquely identify activities performed within our systems by Team Members and are provided based on specific job positions and responsibilities. Team Members are responsible for protecting access to computer systems and should never share their unique login credentials. You may be held responsible for any activities that occur because of your sharing of login credentials. Additionally, we prohibit any unauthorized altering or tampering with the Company's computer systems or devices. Team Members should immediately report any unauthorized individuals in Team Member-only areas of the premises where they may gain access to Company computer systems.

## **Intellectual Property and Copyright Laws**

As a Team Member, the things you create for Portillo's belong to the Company. This includes inventions, discoveries, ideas, improvements, artwork and works of authorship. This work product is Portillo's property if it is created or developed, whole or in part, on company time, as part of your duties, or with Company resources or information.

To ensure that Portillo's receives the benefit of work done by outside consultants, it is essential that an appropriate written agreement or release be in place before any work begins. The Portillo's name is extremely valuable to our success and our brand must be used carefully and protected from misuse.

When Portillo's uses the work product of others, we must also be sure to follow the rules. We respect copyright laws and observe the terms and conditions of any license agreements to which Portillo's is a party. In most cases, this means the software used by our Team Members is copyrighted, and the Company and its Team Members do not have the right to make unauthorized copies of that software. Written materials and software may be subject to copyright protections and should be copied only when permitted. Use caution, as not all copyrighted materials bear a notice or copyright symbol.

[Return to Table of Contents.](#)

## Using Artificial Intelligence (“AI”) Responsibly

Artificial Intelligence (“AI”) tools can help us work more efficiently, improve decision-making, and enhance the guest and Team Member experience. However, we must use AI responsibly, ethically, and in compliance with all Company policies and applicable laws.

For purposes of this Code, AI refers to any technology, system, or tool that performs tasks typically requiring human intelligence by using machine learning, natural language processing, pattern recognition, or automated decision-making. AI includes general-purpose tools, such as ChatGPT, Copilot, or Gemini, and business-specific applications, such as chatbots, automated data analysis, predictive models, or content generation tools. Any software or system that can analyze, generate, predict, or act autonomously based on data inputs should be considered AI, regardless of whether it is developed by the Company, provided by a third party, or integrated into another platform.

Team Members may only use AI systems, tools, or applications that have been pre-approved for business use by the Company. Unauthorized use of AI tools or platforms for Company business, especially if it involves confidential, proprietary, or personal information, is prohibited. If a Team Member is unsure whether an AI tool is approved or appropriate for a particular use, they should consult their manager, the Legal Department, or the IT Security team before using it.

When using AI, Team Members must:

- **Protect Confidentiality:** Never input or share confidential, proprietary, guest, or Team Member information in public or unapproved AI tools.
- **Ensure Accuracy:** Verify any AI-generated information or output before relying on it for business decisions.
- **Maintain Accountability:** Remember that AI does not replace professional judgment. Team Members are responsible for the accuracy and integrity of their work.
- **Use Ethically:** Do not use AI to mislead, manipulate, or create misleading content.
- **Comply with Company Policy and the Law:** Follow all data privacy, intellectual property, and security policies and requirements when using AI tools.

Team Members are expressly prohibited from using AI that has the effect of subjecting Team Members, business partners, or other third parties to any form of harassment or discrimination based on protected class in regard to hiring, promotion, training, discharge, discipline, tenure, or terms, privileges or conditions of employment.

[Return to Table of Contents.](#)

The responsible use of AI is part of our commitment to integrity, innovation, and trust. By using AI thoughtfully and transparently, we protect our Team Members, our guests, our data, and our reputation.

[Return to Table of Contents.](#)

## **WE DELIVER THE RIGHT MESSAGE OUTSIDE OUR RESTAURANTS**

How we interact with our communities and the public plays a significant role in maintaining our business reputation and in our long-term success. We value being considered a trustworthy company, and we believe this is directly linked to our ability to deliver a consistent, fair, and accurate message.

### **Use of Social Media**

We generally support the use of social media and recognize it changes quickly and is an integral part of the way we do business. We must take a balanced approach in the use of social media when it relates to any aspect of our business. We must remember that our interactions within social media sites impact public opinions of our Company and its Team Members. Team Members should not represent or imply that any personal opinions they post on social media are approved or endorsed by Portillo's.

Team Members should always use common sense and avoid unprofessional behavior, including:

- Sharing confidential or proprietary Company information.
- Posting information in a manner that may be considered defamatory or damaging to the Company.

Social media may never be used as the sole method for the release or distribution of material non-public information about the Company.

### **Public Statements and Media Inquiries**

Generally, Team Members are not authorized spokespersons for the Company and should not make public statements on behalf of Portillo's. If you are contacted by the media about a Company matter, you should simply refer the inquiry to the Portillo's Media Email at [press@portillos.com](mailto:press@portillos.com). If you are contacted by someone from a governmental agency seeking an interview or making a non-routine request for Company information, you should assure the agency personnel that Portillo's will comply with all of its legal obligations but refer the matter to the [Legal Department](#). Sometimes, a representative from a governmental agency may visit one of our locations. If you have any doubt or concern about the appropriateness of speaking with someone from a governmental agency, you should seek guidance from the [Legal Department](#).

[Return to Table of Contents.](#)

### Community Involvement and Charitable Contributions

Portillo's is committed to making a meaningful and lasting impact on the quality of life in the communities in which we operate, as well as those in which we don't. Charitable contributions are an integral part of our community involvement. We direct this support through our "[Portillo's for Good](#)" fundraisers and other charitable events we run during the year. We are proud of and committed to The Heart of Portillo's Fund, our very own not-for-profit that supports our Team Members in need.

Any charitable contribution made by a Team Member on behalf of Portillo's, or with the use of Company funds, must be pre-approved by the Company. We encourage our Team Members to take part in activities outside of work in their communities on their own time and with their own resources, so long as it does not interfere with the performance of their job duties and does not imply that Portillo's sponsors such activity.

[Return to Table of Contents.](#)

## RESOURCES

Below is a summary of resources available to assist you in addressing concerns or issues that may arise during your time at the Company. Never hesitate to seek guidance on matters related to our Code, our policies, or the law.

Resources	Best Resources for	Contact Information
<b>Your Manager and Management Team</b>	Often the best starting point for questions about legal or ethical issues and concerns. Your manager and management team are always available and open to discuss your issues and concerns.	Varies based on job role and location
<b>People Team</b>	Questions about employment or work environment issues and concerns (that you may not be comfortable discussing with your manager). Your People Team partners are available to help. This is a toll-free number that is staffed internally by Portillo's People Team. You can leave your name, number, and information to make a report and ask for assistance, or you can make an anonymous report.	Visit MyPortillo's, select Menu, and navigate to MyPortillo's Resources to access information and answers to commonly asked questions.  630.954.3773 and ask for the People Team or via email to <a href="mailto:hr@portillos.com">hr@portillos.com</a> Team Member Hotline (Ethics) at 844.635.4500
<b>Legal Department</b>	Questions or concerns pertaining to: <ul style="list-style-type: none"> <li>The law or the Code that are not addressed (or you are not comfortable addressing) with the above resources</li> <li>Situations that may have a significant, direct, and immediate legal implication</li> <li>Charitable and political contributions policy</li> <li>Company privacy policies</li> <li>Records retention policy</li> </ul>	Via email to <a href="mailto:legal@portillos.com">legal@portillos.com</a>
<b>IT Department</b>	Questions or concerns pertaining to: <ul style="list-style-type: none"> <li>The use of company technology resources</li> <li>Network security</li> </ul>	Via email to <a href="mailto:IT@portillos.com">IT@portillos.com</a>
<b>Loss Prevention Department</b>	Questions or concerns pertaining to: <ul style="list-style-type: none"> <li>Fraud or misappropriation of assets</li> <li>Security of facility and premises</li> <li>Restaurant video needs</li> </ul>	Via email to <a href="mailto:assetprotection@portillos.com">assetprotection@portillos.com</a>
<b>Risk Management Department</b>	Questions or concerns pertaining to: <ul style="list-style-type: none"> <li>Injury and occupational illness prevention</li> <li>Incident reporting</li> <li>Emergency preparedness and response</li> </ul>	Via email at <a href="mailto:risk@portillo's.com">risk@portillo's.com</a>
<b>Portillo's Team Member Hotline</b> <i>(24 hours a day/7 days a week)</i>	Reporting issues should any of the following exist: <ul style="list-style-type: none"> <li>You believe that appropriate financial policies and procedures are not being followed</li> <li>You feel your concerns have not been appropriately addressed by available company resources</li> <li>You are not comfortable talking to someone within your work location in reporting your issue</li> <li>You would like to remain anonymous</li> <li>You need translation services</li> </ul>	844.635.4500 or 'Portillo's Team Member Hotline' available at <a href="http://portillos.ethicspoint.com">portillos.ethicspoint.com</a>
<b>Portillo's Media Outreach</b>	Referring all media inquiries to the Company's Public Relations Department. This address can be provided directly to external media parties.	Via email at <a href="mailto:press@portillos.com">press@portillos.com</a>

Resources	Best Resources for	Contact Information
Myportillospage.com	Detailed policies and procedures applicable to your employment and job responsibilities at Portillo's	myportillospage.com
Team Member Handbook	Detailed policies and standards of conduct applicable to your employment at Portillo's	myportillospage.com
Audit Committee of the Board of Directors	<p>Questions or concerns related to questionable accounting, internal controls, or auditing matters.</p> <p>You can report those concerns via the Portillo's Team Member Hotline, the Legal Department or to the Audit Committee of the Board of Directors.</p> <p>For contacting the Audit Committee of the Board of Directors for such matters, please use the Portillo's Team Member Hotline or email, or write:</p> <p>Audit Committee Portillo's Inc. 2001 Spring Road, Suite 400 Oak Brook, IL 60523</p>	844.635.4500 or 'Portillo's Team Member Hotline' available on portillos.ethicspoint.com.

On rare occasions, limited waivers of the Code may be necessary. Any waiver of this Code for directors or executive officers may be made only by the Board of Directors and will be promptly disclosed to stockholders as required by applicable laws, rules, and regulations.

[Return to Table of Contents.](#)