

DENNY'S CORPORATION
Anti-Human Trafficking Policy

Denny's is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. Denny's will not tolerate or condone human trafficking or slavery in any part of our global organization.

Human Trafficking, Slavery and Forced Labor

This policy applies to all personnel employed by or engaged to provide services to Denny's, including, but not limited to, employees, officers, independent contractors and temporary employees of Denny's (referenced in this policy as "employees").

Every employee is responsible for reading, understanding and complying with this policy. Denny's managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them. If you have any questions or concerns related to this policy, please consult the Denny's Legal Department or Human Resources Department.

Procedures

Report any conduct that you believe to be a violation of this policy to the Denny's Legal Department or Human Resources Department. Reports may also be made through the Denny's Ethics and Compliance Hotline at (844) 954-3349 or via the internet at the following website: <http://dennysmobile.ethicspoint.com/>, which allows anonymous reporting as permitted by applicable law.

Disciplinary Actions

Denny's will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this policy may be grounds for disciplinary action, up to and including termination. Denny's has the exclusive right to interpret this policy regarding its employees.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

International Laws

Denny's respects international principles of human rights – including, but not limited to, those in the UN Declaration of Human Rights, the Trafficking Victims Protection Act as amended, the UK Modern Slavery Act of 2015 and the California Supply Chain Transparency Act – and embody these principles and commitments in our corporate policies and our Code of Conduct.

We comply with the employment laws of every country in which we operate and expect those with whom we do business to do the same.

Employee Code of Conduct

Consistent with our Employee Code of Conduct, found in the useful Docs worklet within Workday, employees may not:

- Use or allow the use of any of Denny's facilities, resources or equipment (including Denny's computers and networks) for the viewing, storage, distribution, promotion or other use of materials in which children are depicted as engaging in any sexual act or are otherwise made an object for prurient interests;
- Enter into, on behalf of Denny's, or otherwise, any business relationships or any other arrangement with any organization which the employee has reason to believe participates in any way in human trafficking and the commercial sexual exploitation of children; or
- Use or allow the use of images or concepts that sexually exploit children.

Denny's also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including:

- Destroying or otherwise denying access to an employee's identity or immigration documents;
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment;
- Using recruiters that do not comply with local labor laws;
- Charging employees recruitment fees;
- Failing to provide return transportation to certain employees who are brought to a country for the purpose of working on a U.S. Government contract;
- Providing housing that fails to meet host country standards; and
- Failing to provide an employment contract or work document where required by law.

Supplier Code of Conduct

The standards we hold for our suppliers are laid out in our Supplier Code of Conduct [<https://www.dennys.com/diversity/suppliers/>], which covers our Five Guiding Principles:

The Power of We, Proud of our Heritage, Embrace Openness, Guests First and Hungry to Win.

The following information is included in response to applicable legislation requiring certain disclosures from Denny's regarding our actions with respect to human trafficking in our supply chain:

- We conduct a supplier approval process to identify, assess and manage risks associated with suppliers.
- We consider product quality, transaction types, specific products we purchase and the geographic locations from which we source commodities, along with other relevant business and legal criteria.
- We follow the trade laws and applicable laws of countries in which we operate, including restrictions on exports and on doing business with certain people, companies or countries.
- We expect all Suppliers to educate their employees, consultants, agents, representatives and subcontractors about the Supplier Code of Conduct to ensure compliance in connection with work performed for Denny's.

Training and Communication

- We communicate our expectations through training opportunities and educational modules on our company intranet. Employees participate in live and online scenario-based training to illustrate ethical decision-making in daily business activities.
- Posters highlighting key messages from our Code of Conduct are posted throughout our corporate offices and restaurants.
- Employees also have access to an intranet site dedicated to Ethics & Compliance information and resources.