



# JABIL Code of Conduct

Integrity – Everywhere, Everyday



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## Our Business Values

### **Integrity – Our Cornerstone**

The cultural cornerstone of the way we do business is our integrity. All interactions with customers, vendors, suppliers, shareholders and fellow employees are conducted with the utmost integrity, honesty and mutual respect.

### **Determination – Our Ingenuity**

We continuously strive for excellence. We are never satisfied with who we are today. We move with speed and take calculated risks; and we hold ourselves accountable for our actions. We think creatively and innovate to ensure we can, and will, be even better tomorrow.

### **Empowerment – Our Employees**

We strive to build a team that is safe, inspired, respected, challenged, empowered and dedicated. We embrace diversity, self-improvement and professional growth; and we have fun! We work together to improve our communities and the environment. We always “Do What’s Right” and we work together to help each other – and Jabil – succeed.

### **Respect – Our Business Partners**

Our strategic business partnerships with customers, vendors and suppliers all produce shareholder value. We delight our customers and partners and grow these relationships by conducting our daily business in a respectful, honest and competitive manner.

### **Commitment – Our Shareholders**

We are a publicly traded company. We have a duty to our shareholders to increase the value of their investment and to vigorously safeguard it. We owe it to them to continuously “Do What’s Right” in every facet of our business. That means we must be at our best competitively and ethically; and strive to increase shareholder value every day.

## A Message from Our CEO

Dear Jabil Colleagues:

For over 50 years, Jabil employees have used their ingenuity and dedication to bring the highest level of service to our customers and shareholders. Our common drive for excellence is built on Jabil's core values.

Our commitment to conduct ourselves with steadfast integrity, in all of our business relationships, is the cornerstone of our culture. It is paramount to the Jabil brand that respect and equality are never compromised.

The revised Jabil Code of Conduct serves as a resource to guide us on ethical business practices. This Code outlines key principles that will help us make the most appropriate decisions in the face of challenging circumstances. I ask that you please read it, always live by it and hold yourselves (and each other) accountable to it.

No single document can ever anticipate every situation. As such, I encourage you to take any unanswered questions or concerns to your direct supervisor, a human resources leader or the Legal Department.

As we strive to be the most technologically advanced and trusted manufacturing solutions provider, I ask that each of you demonstrate uncompromising ethics and principles – both in your words and actions – each and every day. Our collective reputation relies on your individual character.

Thank you for your continued commitment.

Mark T. Mondello  
*Chief Executive Officer*



# Integrity – It's Who We Are

*Our Business Values begin with Integrity. Integrity is the cornerstone of the way we do business.*

## In This Section:

- Know Our Code
- Understand Your Responsibilities
- Asking Questions, Reporting Concerns and Investigations

## Know Our Code

Welcome to Jabil's Code of Conduct ("Code"). Our Code is intended to be a statement of our principles as a company and how we conduct ourselves in the market and the workplace. It is also meant to be a practical guide to communicate our values, our culture and our standards of behavior. Our Code is intended to help if you have questions about our ethics and compliance standards. It will help you apply our values and policies to situations you may face while at work.

The Code is not intended to cover every situation, however, it is intended to provide the baseline standard of conduct for all employees, officers, directors, contractors and suppliers, so that everyone connected to our organization knows what is expected of them. If you need additional information or guidance you can always contact the Global Ethics and Compliance Team or contact any of the other resources listed in this Code.

### Who Must Follow Our Code

**Employees:** Everyone who works at Jabil or any of its subsidiaries worldwide must follow our Code as well as related policies and procedures; this includes all employees, officers and directors.

**Those acting on behalf of Jabil:** We also expect anyone acting on our behalf to conduct themselves in a manner consistent with our Code and compliance policies. This includes vendors, suppliers, consultants, agents, sales representatives, distributors and independent contractors.



## Understand Your Responsibilities

- Always act with integrity and behave in a professional and ethical manner. Your behavior reflects on all of us and on Jabil's reputation.
- Be familiar with the information contained in this Code and related policies. Pay particular attention to the policies that apply to your job responsibilities.
- Report suspected illegal or unethical behavior using any of the resources listed in this Code.
- Remember, there is never an excuse for violating the law, our Code or any Jabil policy.

### Additional Responsibilities of Jabil Leaders

Leaders and supervisors have additional responsibilities to help us meet our high standards of integrity, ethics and compliance:

- Understand as leaders you own compliance for your organization.
- Lead by example and be a role model for ethical behavior. Communicate to employees and business partners how this Code, policies and business practices apply to their daily work.
- Create an environment where employees understand their ethical responsibilities and feel comfortable raising concerns without fear of retaliation.
- Ethics and compliance are key factors when evaluating and rewarding employees.
- Emphasize the importance of this Code and reinforce Jabil's commitment to conducting business legally and ethically.
- Proactively communicate that business results are never more important than integrity, ethical conduct and compliance with our policies and the law.
- Understand when to escalate issues, report violations and get assistance from the Global Ethics and Compliance Team.
- Ensure that Jabil's zero tolerance position on retaliation against good-faith reporters is strictly enforced.



### Making the Right Decision

Making the right decision is not always easy. There will be times when you may be under pressure or unsure of what to do. Always remember that resources are available to help, including those listed in this Code.

**When faced with a difficult decision, it may help to ask yourself these questions:**

- Why am I having difficulty making a decision?
  - Do I have all the information I need?
  - Am I really unsure about what to do, or am I reluctant to do what I know is right?
- Have I considered all the possible options?
- Have I thought through the consequences and the risks involved, including the impact on other employees and customers?
- What effect will my decision have on Jabil's reputation?
- Is my decision consistent with our Values, our Code, company policies and the law?
- Do I understand the Legal issues that may be involved, or do I need to consult with the Legal Department?
- Would I feel comfortable reading about my decision in the media?
- What would my family, friends, neighbors and co-workers think of my actions?
- Would I be comfortable describing my decision at a Company meeting?
- Is there someone within Jabil that I should turn to for help?

## Asking Questions, Reporting Concerns and Investigations

Everyone must do their part if we are to maintain our high standards for integrity and ethics. If you are aware of any potential wrongdoing, please report it so that the situation can be reviewed and addressed.

You do not have to have all of the facts. If you see or even suspect unethical or illegal behavior that you believe would violate this Code, or if you have a question, you have several options:

- Discuss the issue with your supervisor, if you feel comfortable.
- Talk to any other member of management, Human Resources or the Legal Department.
- At any time you may contact the Integrity Hotline. You can use the Jabil Compliance website: <https://Jabilglobalcompliance.com> to make a report or get the Integrity Hotline telephone number for your location.

### Investigations and Confidentiality

Any information provided through the Integrity Hotline or through any other reporting channel will be treated confidentially to the extent possible. If an investigation is needed, it will be conducted by the Global Ethics and Compliance Team and may also involve other Jabil personnel or external resources. Jabil may be required by law to report certain types of activities.

No one within the company, including Executives, Managers and Employees, may conduct their own investigations unless specifically directed to do so by the Global Ethics and Compliance Team. All personnel employed by Jabil are required to fully cooperate with all investigations, to answer questions truthfully, and to provide all relevant information.

### Zero Tolerance for Retaliation

Jabil will not tolerate retaliation against anyone who reports a problem in good faith, nor will we tolerate retaliation against anyone who participates in an investigation. If you believe you have been retaliated against or have witnessed retaliation, report it to the Global Ethics and Compliance Team immediately.

Reporting “in good faith” means that you had reason to believe a violation existed and are sincere in your attempt to provide honest and accurate information, even if the investigation determines there was no violation.

### Accountability and Discipline

When a violation of this Code, policies or the law occurs, appropriate disciplinary action will be taken, up to and including termination of employment. Certain actions may also result in legal proceedings, penalties or criminal prosecution.



### How to Use the Integrity Hotline

Our Integrity Hotline is a confidential way to report possible violations of the Code or any policies, or laws. You may contact the Integrity Hotline 24 hours a day, 7 days a week. The Integrity Hotline call center is staffed by third-party compliance specialists and provides translations in all languages.

When you contact the Integrity Hotline, the operator will listen, ask questions if necessary and then write a summary report. The summary will then be provided to the Global Ethics and Compliance Team for review and further action.

You can call the Integrity Hotline anonymously, where allowed by local law. It is important to provide as many details as possible (who, what, when, where). Since Jabil may need additional information, you will be assigned a report number. Please check back regularly to provide follow-up information or answer any follow-up questions that the Global Ethics and Compliance Team may have.



# Our People

*We'll always try to "do the right thing" in how we interact with each other.*

## In This Section:

- Respect in the Workplace
- Health and Safety
- Environmental Responsibility
- Protecting Employee Personal Information

## Respect in the Workplace

All employees are entitled to work in a respectful environment, free from harassment and discrimination.

Jabil complies with all applicable employment, labor and immigration requirements, and we expect all of our employees to do the same. We are committed to equal employment opportunity and prohibit discrimination or harassment based on race, religion, religious practices, creed, color, national origin, sex, sexual orientation (including gender identity), marital status, age, physical or mental disability, medical condition, genetic information, ancestry, veteran status or any other characteristic protected by law.

- We value diversity and inclusion.
- Do your part to help create an open, respectful and collaborative culture.
- Keep an open mind to new ideas and opinions, and listen to the viewpoints of others.
- Take a clear stand against offensive messages, comments and inappropriate jokes. Such actions are inconsistent with our culture and undermine the team environment we've all worked so hard to create.

**FIND OUT MORE:** [Policy Link](#)



**question** While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office and it was 'after hours' so I wasn't sure what I should do. Is it harassment?

**answer** Yes it is. This type of conduct is not tolerated, not only during working hours but in all work-related situations including business trips. If you are comfortable, you can tell your colleague such actions are inappropriate and must be stopped. If you are not comfortable or the comments continue you should notify your supervisor, Human Resources or the Jabil Integrity Hotline.



**question** One of my co-workers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, and I usually delete them. No one else has spoken up about them. Should I do more?

**answer** If you feel comfortable, you can talk to your co-worker about your concerns with his/her comment. If you are not comfortable doing this or the comments continue you should notify your supervisor, Human Resources or the Integrity Hotline. Sending such jokes violates our policies on diversity, harassment, discrimination and the use of our email systems. By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.

## Health and Safety

We look out for one another to ensure that our co-workers, contractors and visitors are safe.

- Help maintain a safe working environment and be proactive to minimize and prevent workplace injuries.
- Know the emergency and security procedures that apply where you work.
- Never bypass or “work-around” safety or environmental procedures.
- Be sure that your performance is not impaired by alcohol or any drugs, including prescriptions and over-the-counter medications, while conducting Jabil business.

- Employees who are driving on Company business must never email, check the Internet or text while driving.
- Help contractors and others we work with to understand and follow our safety and environmental procedures.
- Alert your supervisor about any unsafe conditions.
- If you are injured on the job, report it to a supervisor immediately, no matter how minor. Never assume that someone else has made the report.
- Supervisors must never pressure employees to not report workplace injuries.

## Environmental Responsibility

In addition to complying with all applicable environmental laws, Jabil is committed to sustainability in our operations. We meet or exceed applicable environmental laws and work to continuously improve our environmental performance through resource conservation, waste minimization, water and energy efficiency and effective use of raw materials.

- Comply with all laws, policies, permits and regulations aimed at:
  - Protecting the environment.
  - Conserving energy, water and natural resources.

- Reducing the environmental impact of our operations.
- Report to your supervisor any incidents or conditions that might result in an environmental regulatory violation or adverse environmental impact.
- Be proactive and look for ways that we can reduce waste and use energy and natural resources more efficiently.

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### Workplace Violence

Violence of any kind has no place at Jabil. We are committed to providing a safe work environment for our employees and visitors to our facilities. We will not tolerate:

- Threatening or intimidating others at any time, whether physically or verbally, for any reason.
- Acts of vandalism, arson or other criminal activities.
- Weapons of any kind are not allowed in any of Jabil's facilities

## Protecting Employee Personal Information

We respect the privacy of employees. Always handle private information with care. Follow our policies and protect any personal information that is entrusted to you.

Data privacy laws cover how we must collect, store, use, share, transfer and dispose of personal information, and we comply with those laws everywhere we operate.

If you learn that personal data has been used in violation of our policies or if the security of any system or device containing personal data has been compromised, notify your supervisor or the Global Ethics and Compliance Team.

- Keep private, personal information safe and secure.
- Collect, access and use personal information for legitimate business purposes only.
- Use care when you provide confidential personal data to anyone inside or outside of Jabil and limit access to authorized individuals.
- When we use third parties to provide services for us, make sure they understand the importance we place on privacy.

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# Our Company

*We must be at our best not only competitively but ethically as well.*

## In This Section:

- Accurate Recordkeeping and Financial Reporting
- Legal Proceedings
- Confidential Information
- Use and Public Disclosure of Material, Non-public Information
- Use of Company Assets
- Using Social Media



## Accurate Recordkeeping and Financial Reporting

Investors, government agencies and others rely on our accurate and complete business records and disclosures. Accurate information is also essential within Jabil so that we can make informed business decisions.

Our books and records must be accurate, timely, complete and in compliance with applicable accounting principles (i.e., US GAAP and local requirements) and our internal controls.

Employees with finance or accounting jobs have a special responsibility in this area, but all of us contribute to the process of recording business results and maintaining records.

- Make sure all contracts are accurate and fully executed.

- Make sure that financial entries are clear and complete and do not hide the true nature of any transaction.
- Never record inaccurate sales or shipments, or record them early, understate or overstate known liabilities and assets, or defer recording items that should be expensed.
- Speak up if you are not sure of the accuracy of information in a Company record.
- Never make false claims on an expense report or time sheet.
- Never under any circumstances alter or falsify documents or intentionally omit information to mislead others.

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## Legal Proceedings

Jabil will appropriately respond to all formal legal claims and regulatory inquiries; this includes summonses, complaints, subpoenas, official regulatory correspondence or other similar documents. If you receive any of these documents, or any non-routine government or legal request, immediately forward the information to the Legal Department. The Legal Department will be responsible for coordinating the Company's official response. Do not provide information in response to any such inquiries without the approval of the Legal Department.

- If you are asked by a member of the Legal Department to provide information in connection with a government or regulatory inquiry or investigation, make sure that any information you provide is truthful, complete and accurate.
- Do not provide information to outside parties in connection with legal inquiries without the written approval of the Legal Department.
- When working with investigators do not attempt to obstruct in any manner the collection of information, data, testimony, or records, and never mislead any investigator or other government or regulatory official.



### Legal Holds

Documents should only be destroyed in accordance

with Jabil's Records Management Policy and Records Retention Schedule and never in response to or in anticipation of an investigation, lawsuit or audit.

If you receive a "Legal Hold", "Preservation Directive" or "Tax Audit Hold" you must respond or acknowledge you received the Hold notice and you must not alter or discard any relevant information. Contact the Legal Department if you have any questions.

## Confidential Information

The unauthorized release of confidential information can cause us to lose our competitive advantage, embarrass Jabil and damage our relationships with our customers and business partners. For these reasons, confidential information must be treated carefully. Some examples of confidential information include:

- Business plans and budgets
- M&A information
- Sales and profit figures
- Pre-market release public financial filings
- Privileged legal information
- Customer and Supplier information
- Audit reports and working papers
- Pricing
- New product or marketing plans
- Research and development ideas, and
- Manufacturing processes

Confidential information exists in many forms and includes information stored on computers, transmitted over networks, contained in video format, printed or written on paper, sent by fax, stored on USB drives or discussed during telephone conversations.

- Use and disclose confidential information only for legitimate business purposes.

- Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- Do not share passwords or allow other people, including friends and family, to use our information technology resources.
- Do not duplicate, install or use software in violation of Jabil policies, copyrights, trademarks or applicable license terms. This includes software installed on your computer or on network areas.
- Do not use cloud or Software as a Service (SaaS) applications to transfer files, share documents or collaborate, unless the application is licensed by Jabil for employee collaboration with external parties.
- Do not use personal email or personal shared drives to transfer files, share documents or collaborate with external parties.
- Do not disclose information to third parties, including business partners and vendors, without appropriate authorization and any required confidentiality agreements. If in doubt, check with your supervisor or the Legal Department.
- Do not discuss confidential information in public places where others may overhear.

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### Confidential Information or Intellectual Property

Any unauthorized disclosure or misuse of Jabil confidential information or intellectual property, either during or after your employment with Jabil, could be harmful to Jabil or to our customers. Jabil, our customers and our suppliers entrust us with confidential and proprietary information, and it is equally important that we handle it with care, and according to any applicable contractual obligations, including the terms of the Confidentiality Agreements we sign as an employee.

To minimize the likelihood of an unintentional disclosure of sensitive information, make sure you take reasonable precautions. For example, use strong passwords and do not write them down, secure your computer and workstation, use only Jabil-approved applications for storage and collaboration and never leave your laptop or mobile phone unattended, particularly when traveling.

If you have questions or concerns about the appropriate use of confidential information or intellectual property, please contact the Jabil Legal Department.

## Use and Public Disclosure of Material, Non-public Information

In the course of business, you may become aware of material, non-public information about Jabil or other publicly traded companies, including our customers. Using this information for personal gain, sharing it with others, or spreading false rumors, is not only unfair to other investors, it's illegal.

- Never buy or sell any stocks, bonds, options or other securities of any company, including Jabil, based on material, non-public information.
- Do not pass on material, non-public information or "tips" to others.
- Know the kinds of information considered material, non-public information. Examples include non-public information about mergers or acquisitions, sales or earnings results, financial forecasts, changes to the executive management team, pending material lawsuits or major business wins or losses, to name just a few.
- If you have any questions about whether information is material and non-public, contact the Legal Department.

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### Definitions

Information is **material** if it is likely that an investor would buy or sell a security as a result of having that information.

Information is **non-public** if it has not been released broadly to the public, for example, through a widely published press release or securities law filings.



**question** A supplier told me about a new product in confidence. We cannot use the product, but I think it has real potential and that shares in the supplier's company will go up fast. Can I buy stock in the company?

**answer** No. You cannot buy the supplier's stock until the information you have is publicly available. You currently have material non-public information which was given to you in confidence and has not been publicly disclosed. This is information that a reasonable investor would probably consider important in making an investment decision about the company.



**question** I work with a Jabil customer and I don't think I have any material non-public information. I think they are a good company and I would like to buy their stock. Can I purchase it?

**answer** The interpretation of what is material, non-public information can be complicated. You should contact the Jabil Legal Department.



## Use of Company Assets

Jabil provides us with various resources (“Company Assets”) to aid in the performance of our job responsibilities for the Company.

Each of us is entrusted with the care of Company Assets. We must protect them from loss, damage, theft, waste and improper use at all times.

Jabil Assets include, but are not limited to:

- Jabil issued and/or supported IT assets, such as computers, phones, peripheral equipment (e.g., printers), software applications (e.g., email) and other associated devices, systems, networks and their contents;
- Jabil physical property, such as facilities, equipment, tools, vehicles, inventory, scrap or obsolete materials and supplies; and
- Other corporate asset types, such as financial resources, intellectual property, confidential information, paper and electronic files and documents, branding and logos.

Jabil Assets should be used in a responsible, professional manner and for work -related purposes only.

Jabil Assets, including scrap and obsolete materials, must not be given or sold to anyone without appropriate approval.

Jabil Assets should only be stored or shared using Company authorized software, cloud or Software as a Service (SaaS) applications, devices and procedures.

Information or data created, received or maintained on Jabil Assets, such as computer files, emails, voicemail messages and Internet usage, are considered Jabil property. The Company reserves the right to monitor, access, review, copy, modify, delete or disclose such contents as deemed necessary and appropriate for a legitimate business purpose. Accordingly, your expectation of privacy when using Jabil Assets is limited.

Limited personal use of company phones and email is allowed as long as it does not have a negative impact on your performance, productivity, the work environment, or violate any Jabil policies or laws.

Personal email or personal shared drives should not be used to transfer, share, or collaborate on Jabil Assets.

**FIND OUT MORE:** [Policy Link](#)



### Cybersecurity

We are all increasingly dependent on networks, databases and the information they contain. Each of us must do our part to protect our data and information systems from accidental and intentional breaches:

- Make sure you follow our policies and practices that are designed to protect our networks, computers, programs and data from attack, damage or unauthorized access.
- Protect your user names and passwords.
- Be alert to phishing scams or other attempts to uncover sensitive personal or corporate information.
- Don't open suspicious links in emails, even if you think you know the source.

If you see something, say something!  
Report suspicious activity immediately to the Global Ethics and Compliance Team at [global\\_compliance@jabil.com](mailto:global_compliance@jabil.com).

## Using Social Media

Be careful when creating a public profile and writing communications that could indicate Jabil's endorsement. Think carefully before you hit the 'send' button in an email or a text. When using social media:

- Exercise care when listing Jabil as your employer on any social media site, with the understanding that your social media activity may impact Jabil and/or the Jabil workplace.
- Clearly state that any opinions you express are your own and do not reflect those of Jabil.
- Don't disclose confidential business information about Jabil, our customers or our business partners.

- If you see something online that could be potentially harmful to Jabil, report it immediately to the Integrity Hotline. Don't respond to negative comments yourself.
- Do not announce things that are not yours to announce, but do support major Company announcements.
- Use good judgment, including expressing ideas and opinions in a respectful manner.

**FIND OUT MORE:** [Policy Link](#)



**question** I have included Jabil as my employer on Facebook, is it appropriate for me to post personal opinions about Jabil customers and suppliers?

**answer** Be mindful that when you link your social media profile to Jabil in any way, your postings may be attributed to Jabil. If you have a question, please contact the Communications Department.



Be careful when using social media to discuss social or culturally sensitive topics such

as:

- Politics
- Religion
- Gender
- Sexual Orientation
- Gender Identity
- Or other related sensitive topics

These comments could be attributed to Jabil.

# Our Customers and Partners

*We must nurture and grow our business partnerships by conducting our daily business in a respectful, honest and competitive manner.*

## In This Section:

- Conflicts of Interest
- Gifts, Entertainment and Hospitality
- Business Partner Relations
- Gathering Competitive Information

## Conflicts of Interest

A conflict of interest can happen whenever you have an interest that may interfere with your ability to make decisions in the best interest of Jabil.

Your obligation as a Jabil employee is to proactively avoid all situations that can lead to even the appearance of a conflict of interest. If you find yourself in a potential conflict of interest situation, you must review the Conflicts of Interest Policy, and follow the prescribed process to disclose the situation and get preapproval. Depending on the circumstances, Jabil may be able to work with you to resolve conflicts when they are disclosed and handled properly.

It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts may arise. Being able to recognize a potential conflict can help you avoid one.

Below are some examples:

- You, a family member or a close personal friend holding a financial interest, as described in the policy, in a company that does business with or that could otherwise affect Jabil's business.
- Making or influencing Jabil business decisions that benefit a family member or close personal friend.
- Taking a job that may interfere with your job at Jabil or tempt you to use Jabil working hours or assets to carry out that job.
- Taking a second job at a company that competes with Jabil or does business with Jabil in any way.
- Employing a family member of a customer or supplier.
- Misusing Jabil assets or influences to promote or assist an outside business.
- Conducting business with, or employing, a spouse, domestic or civil partner, relative or close personal friend. This includes: mother, father, siblings, children, nieces/nephews, grandparents, cousins and aunts/uncles, whether related by blood, marriage or adoption.

**FIND OUT MORE:** [Policy Link](#)

**Q&A question** Do conflicts of interest include people with whom I have close personal relationships, as well as family members?

**answer** Yes. Our policy covers any close relationships that may create an actual or apparent conflict of interest. While it is impossible to anticipate every circumstance, you should be concerned if any activity or relationship interferes – or could be perceived by others to interfere – with your objectivity. All potential conflicts must be disclosed to management. If you have questions, please contact the Global Ethics and Compliance Team.

**Q&A question** A colleague's son is applying for a job on our team. Is this allowed?

**answer** This relationship should be disclosed to management and HR during the hiring process. Management and HR, with guidance from the Global Ethics and Compliance Team as needed, will work to eliminate or manage the conflict if the son is offered a position on the team.

**Q&A question** My spouse owns a company that wants to be a Jabil supplier. Should I do anything?

**answer** Yes. This relationship could create a conflict of interest that needs to be reviewed by Jabil. You must review the Conflicts of Interest Policy, and disclose the potential conflict using the process described.

## Gifts, Entertainment and Hospitality

Jabil requires the use of good judgment, discretion and moderation when giving or accepting gifts or hospitality in a business setting. Gift giving and hospitality practices may vary in different cultures, however any gifts and hospitality given or received must be preapproved per the guidelines outlined in Jabil's policies and be in compliance with applicable laws.

We do not accept or provide gifts, entertainment or hospitality if the intent is to bias a decision or is in return for any business, services or confidential information.

The following practices are never allowed:

- Giving or receiving gifts or entertainment during any bidding process (sales or procurement).
- Giving or accepting lavish or frequent gifts or entertainment.
- Giving or accepting any gift of cash or a cash equivalent (gift cards, gift certificates).
- Giving or accepting any gift or entertainment that could be embarrassing or reflect negatively on our reputation or your reputation.
- Any gift or entertainment that violates the policies of the recipient's organization.
- Giving gifts or entertainment of any kind to a government official without prior approval.

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### Gifts and Entertainment – Government Officials

Extra care needs to be taken when dealing with government officials. Complex rules govern the giving of gifts and entertainment to government officials (which includes employees of state-owned entities). What may be permissible for commercial customers may be illegal when dealing with the government.

- No gifts or other benefits, including entertainment, can be offered to government officials without prior approval.
- Any request made to an employee by a government official for a payment, other than legitimate taxes or fees, must be reported immediately to the Global Ethics and Compliance Team.
- If you have questions, contact the Global Ethics and Compliance Team.



**question** A supplier is offering to pay all expenses for me to attend a conference. Can I accept?

**answer** Anything of value that is offered to you by a supplier, customer or third party should be reasonable and customary and consistent with our Gifts, Entertainment & Hospitality policy. You should always disclose the offer to your supervisor and get prior approval before accepting. If you have a question, review the policy or seek guidance from the Global Ethics and Compliance Team.



**question** During the holiday season I would like to give my customers and suppliers a gift.

**What is acceptable?**

**answer** The Gifts, Entertainment & Hospitality policy gives guidance on reasonable and customary limits when providing gifts on behalf of the company for every country in which Jabil operates. Any gift that exceeds the limit in the policy must be preapproved by the process outlined in the policy.

## Business Partner Relations

Our business partners consist of customers, suppliers, vendors, agents and intermediaries, and they all make significant contributions to our success. To create an environment where they have an incentive to continue to work with us, they must be confident that they will be treated lawfully and ethically.

We will only do business with partners that comply with applicable legal requirements and meet our standards relating to labor, the environment, health and safety.

- Purchase supplies and select business partners based on need, quality, service, price, terms and other relevant conditions.
- Protect our confidential and proprietary information including, where appropriate, with a confidentiality agreement. Also safeguard any confidential information or personal data that a supplier provides to Jabil. Use only Jabil-approved software and SaaS applications for sharing files and collaborating with external customers and resources.
- Make vendor-related decisions in the best interest of Jabil, not for any personal benefit or gain for you or a family member.
- Watch for any signs that our business partners are violating applicable laws and regulations, including bribery and corruption, environmental, employment, human rights and safety laws.



## Gathering Competitive Information

We obtain competitive information only through legal means and never through misrepresentation, or through any behavior that could be construed as “espionage” or “spying”.

- When collecting business intelligence always live up to our standards of integrity – never engage in fraud, misrepresentation or deception to obtain information.
- When we hire former employees of competitors, we must respect their obligation not to use or disclose the confidential information of their former employers.
- If you have any questions about whether certain competitive activities comply with the Code, you should immediately consult with your supervisor or the Legal Department.

**FIND OUT MORE:** [Policy Link](#)

# Our World

*We can never be satisfied with who we are today... We can, and will, be even better tomorrow.*

## In This Section:

- Anti-bribery and Anti-corruption
- Working with Governments
- Global Trade Compliance and Anti-Money Laundering
- Fair Competition
- Human Rights
- Serving Our Communities
- Charitable and Political Activity

## Anti-bribery and Anti-corruption

Bribery and corruption in all of their forms violate Jabil values and this Code. Always work with integrity. Never offer or accept a bribe from anyone, especially government officials – and remember, we're not only responsible for our actions, but also for the actions of anyone who represents Jabil.

The laws in some countries include additional penalties for bribing government officials, but for us it's simple: offering or accepting a bribe from anyone, at any time, is always wrong.

- Do not give or accept bribes or kickbacks, offer facilitation payments or accept or offer any other kind of improper payment.
- You must disclose and get preapproval (as outlined in our Anti-Bribery, Anti-Corruption Policy) for any government-related expenditures, including meals, entertainment and gifts.

- Keep accurate books and records so that payments can be honestly described and documented.
- Follow our anti-corruption and anti-bribery standards when selecting others that provide services on our behalf. Be vigilant and monitor their behavior. Never 'look the other way.'
- Be aware that not reporting a bribe is a violation of this Code.
- Gifts to family members of a government official may be considered bribes.
- Bribery of a government official and the bribery of commercial personnel, including kickbacks or bribes paid to any Jabil employee, Jabil supplier or Jabil customer, are prohibited by this Code.



### The Global Impact of Bribery and Corruption

We know that paying bribes can harm our reputation and cost millions in fines and fees – but there's even more at stake.

Companies that pay bribes may be able to win business even though their products and services are inferior to ours. In addition, corruption is especially harmful in developing countries and the money from bribes and corruption often supports corrupt regimes.

For all these reasons we have a zero-tolerance policy on bribery and corruption. It's not just illegal, it's

completely contrary to the way we do business.

Some of our activities pose a higher risk of bribery and corruption. If you have contacts with local government officials and agencies, for example a building license agency, safety inspectors, fire departments, environmental, labor, electrical, water, and sewer inspectors or international governmental organizations, you should be especially vigilant. Review our policies and contact the Global Ethics and Compliance Team with any questions.



### Definitions

A **bribe** is anything of value that is given to

influence the behavior of someone in government or the private sector in order to obtain business or financial or commercial advantage. A bribe can be something other than cash. A gift, a favor, even an offer of a loan or a job could be considered a bribe. Before offering anything of value, refer to our policies and ask questions about what's acceptable (and what's not).

**Government officials** include employees of governments, but the term also covers employees of government-owned businesses as well as party officials, candidates for political office, members of the Royal Family and employees of international organizations such as the World Bank.

**Facilitation payments** are typically small payments to a low-level government official that are intended to encourage the official to perform responsibilities for which they are already legally obligated to do.

**FIND OUT MORE:** [Policy Link](#)



## Anti-bribery and Anti-corruption (Cont.)



**question** I work in a country that is generally considered high-risk for bribery and corruption. We are considering paying for several employees of a state-owned customer and their spouses to travel to the U.S. for a week, to attend a day of meetings followed by shopping and sightseeing. These employees are not considered to be government officials under local law, so do I need to get advance approval?

**answer** Yes you need to review the situation with the Global Ethics and Compliance Team. The definitions of a government official in the U.S. and under the UK Bribery Act may be broader than local law and would likely include employees of the state-owned company. If this is the case, the proposed hosting of travel for the employees and their spouses would not be approved since the inclusion of spouses, shopping and sightseeing are not business related.



**question** I was authorized to hire a consultant to help us get the local permits needed for a new project. They asked for a \$40,000 retainer to 'help move the process along'. Should I agree to this payment?

**answer** No. Before engaging the consultant you need to seek guidance from the Global Ethics and Compliance Team and perform due diligence on the consultant. Before agreeing to make any payment, we need to know how the money will be used. Jabil must make sure this money is not used as a bribe or facilitation payment. You need to talk to the Global Ethics and Compliance Team about it before you do anything.



**question** A prospective vendor offered me \$1000 to approve them to Jabil's Approved Vendor List (AVL). They are qualified to do the work and their pricing is competitive. Can I take the money and add them to the AVL for Jabil?

**answer** No you cannot. The money or any other thing of value is considered a bribe. A bribe can be anything of value that is given to influence the behavior of someone in order to obtain business or commercial advantage. Contact the Global Ethics and Compliance Team or the Integrity Hotline so that this matter can be properly assessed.

## Working with the Government

Special legal and contracting rules often apply to our dealings with governments. These include bidding or procurement requirements, special billing and accounting rules, and restrictions on subcontractors or agents we may engage (Also see the Gifts, Entertainment and Hospitality section of this Code).

We must always take care in our business dealings with others to communicate accurate and complete information; however, it is even more critical when dealing with government customers. Misleading or inaccurate information communicated to government customers could result in severe legal action and even criminal prosecution.

- If you deal with domestic or foreign governments, know the laws that are applicable to these business activities, use sound judgment to avoid any violations of the letter or spirit of the laws, and contact the Global Ethics and Compliance Team if you have any questions.
- Do not pursue government business without first talking to the Global Ethics and Compliance Team.
- If you work with the U.S. Government, you must read and comply with the Jabil Defense and Aerospace Services policy.



### Cooperating with Government Inquiries

Notify the Legal Department immediately whenever there is a non-routine government request for information or visits. Always cooperate with government authorities in connection with requests for information or inspections. When responding to a government request, tell the truth. Never mislead anyone, impede their work, or conceal, destroy or alter documents.



## Global Trade Compliance and Anti-Money Laundering

Many laws govern the conduct of trade across borders, including laws that are designed to ensure that transactions are not being used for money laundering. Other laws address economic sanctions against individuals or countries, regulate exports or prohibit companies from cooperating with unsanctioned boycotts.

We are committed to complying with all such laws. If you are involved in international operations, logistics, finance, meeting planning, regulatory or legal, it is especially important that you know and comply with the requirements associated with the countries in which you do business.

- Maintain required import, export and customs records at each Jabil business location.
- If you receive a request to participate in a boycott or are asked about our position on a boycott, contact

the Legal Department immediately.

- If there appears to be a conflict between laws, customs or local practice, get help from the Legal Department.
- Trade sanctions, including financial sanctions, are complex. If you are involved in transactions, such as business dealings with a sanctioned country, entity or person, you must contact the Global Ethics and Compliance Team.
- Always use the export classification of goods, software or technology to determine if they require government authorization for export.
- Any questions or concerns about trade laws or known violations should be directed to the Legal Department.

**FIND OUT MORE:** [Policy Link](#)



### Money Laundering

Money laundering is the process by which illegally obtained funds are moved through the financial system to conceal their criminal origin. Jabil is committed to complying with all applicable anti-money laundering laws, rules and regulations.

To help prevent and detect money laundering, only do business with reputable third parties who engage in legitimate business activities and avoid any suspicious transactions that seem to be structured to conceal illegal conduct or illegally obtained funds. Contact the Legal Department if you have any questions.

## Fair Competition

We believe in free and open competition. We gain our competitive advantages through the quality of our products, rather than through unethical or illegal business practices.

Every country where we operate has laws that govern relationships with competitors, suppliers, distributors and customers. While the legal requirements vary, fair competition laws (also called “anti-trust laws” in the U.S.) generally share the same objective – to ensure that markets operate efficiently by providing competitive prices, customer choice and innovation.

- Never talk with or signal our competitors about any aspect of our pricing, sales volumes, customers or territories.
- Do not attend a meeting with a competitor where the subject of price or other sensitive information is likely to be discussed.
- Don't agree with a competitor to coordinate bidding to a customer.
- Consult with the Global Ethics and Compliance Team if you have any questions or concerns about violations of anti-competition laws.



### Industry Meetings

Industry and trade association meetings serve legitimate and worthwhile

purposes. However, these meetings bring together competitors who might discuss matters of mutual concern and potentially cross the line. Even joking about inappropriate topics, such as marketing or pricing strategies, could be misinterpreted and misreported.

If the conversation turns to any kind of anti-competitive discussion, you should refuse to discuss the matter, leave the conversation immediately and report what happened to the Global Ethics and Compliance Team.

FIND OUT MORE: [Policy Link](#)



## Human Rights

Jabil promotes respect for fundamental human rights and views them as an essential element of responsible corporate citizenship. In addition to support of the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights, Jabil is also a full member of the Electronics Industry Citizenship Coalition (EICC).

Jabil is always looking for ways to improve respect for human rights throughout its organization and supply chain. In particular, we are committed to the following internationally recognized standards:

- Employment should be a free choice. Forced, bonded or indentured labor, involuntary prison labor, slavery or trafficking of persons is never acceptable.
- Child labor must never be used in any stage of manufacturing.
- Working hours should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers should be allowed at least one day off every seven days.
- Wages and benefits must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

- Harsh and inhumane treatment including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse is prohibited; nor should workers be subjected to threats of such treatment.
- The workplace should be free of harassment and unlawful discrimination.
- The right of all workers to form and join trade unions, to bargain collectively and to engage in peaceful assembly as well as the right of workers to refrain from such activities, must be respected.

Each of us can help support efforts to eliminate human rights abuses at Jabil and throughout our supply chain. Report any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners to the Integrity Hotline.

**FIND OUT MORE:** [Policy Link](#)



## Serving Our Communities

Jabil is proud to support civic and charitable activities and we encourage our employees and those who are working on our behalf to do the same.

- If you volunteer to help civic or charitable organizations, be sure that your participation does not interfere with your work. Speak with your supervisor if you wish to use Jabil's time or resources to support charitable or nonprofit causes.

- Do not make any direct or indirect contribution on behalf of Jabil unless you are authorized to do so.
- Never give the impression that your personal participation in a charity or event is endorsed or supported by Jabil unless Jabil's support has been approved in advance.

**FIND OUT MORE:** [Policy Link](#)



## Charitable and Political Activity

We believe in the right of employees to participate in the political process. If you are active in charitable and political activities it should be on your own time and at your own expense.

Consistent with applicable laws, Jabil will exercise its right and responsibility to make its position known on relevant issues. When doing so, we follow all lobbying laws, and may engage employees or professional lobbyists to work with government officials on our behalf. We do not allow any lobbying activities on Jabil's behalf without specific authorization from the General Counsel.

- In all communications, make it clear that your political views and actions are your own and not those of Jabil.

- Never use Company funds, assets or facilities to support any charity, cause, political candidate or party unless approved by the Legal Department (Also see the Use of Company Assets section of this Code).
- Never pressure another employee, customer or business partner to contribute to, support or oppose any political candidate or party.
- Never make a charitable or political contribution with the intent to improperly influence someone.

**FIND OUT MORE:** [Policy Link](#)

## Our Global Ethics and Compliance Program

The Jabil Code of Conduct and our Global Ethics and Compliance Program are endorsed by and have the full support of the Board of Directors. The Board of Directors and management are responsible for overseeing compliance and enforcing the Code.

The Global Ethics and Compliance Team, among other things, applies and interprets the Code, manages the intake and investigation of compliance concerns, disseminates ethics and compliance trainings and communications, and assists with the design and implementation of preventative compliance measures.

The Global Ethics and Compliance Team is managed by the Chief Ethics and Compliance Officer who reports directly to the General Counsel and the Chairman of the Audit Committee of the Board of Directors. The General Counsel and Chief Compliance Officer have direct access and reporting obligations to the Board of Directors and Audit Committee. In administering the Code, the Global Ethics and Compliance Team works closely with the rest of the Legal, Finance, Human Resources, Risk Office and other groups focused on ensuring compliance.

### Our Global Ethics and Compliance Team

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