Jabil is committed to maintaining the highest ethical and legal standards. We strive to comply with both letter and spirit of the laws and regulations in each country in which we do business. We conduct our day-to-day business in an honest and ethical manner with everyone.

As a worldwide company, we are subject to prohibitions of the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act (UKBA). Bribery is a crime almost everywhere. Many of these anti-corruption laws prohibit bribery among private commercial parties as well as bribery of foreign or domestic public officials.

Our obligations, however, are not limited to those laws. The global community has increasingly focusing on corruption as a major impediment to commercial development. Jabil specifically follow the requirements of the Electronic Industry Citizenship Coalition (EICC).

Jabil has zero tolerance of bribery and corruption. Jabil’s Foreign Corrupt Practices Act, UK Bribery Act and Anti-Corruption Corporate Policy (the “ABAC Policy”) extends to all Jabil business dealings and transactions in all countries in which our supplier or its subsidiaries and associates operate in. Your compliance with our anti-corruption policies is expected and it is a condition of your business relationship with Jabil.

Suppliers Shared Responsibility

This guide is designed to help you understand our anti-bribery standards and how to apply these standard when transacting business with Jabil or acting on our behalf.

As a supplier of Jabil, you share a responsibility to help prevent bribery and corruption. You are expected to:

- Read, understand and acknowledge the content of this Guide, Jabil’s ABAC policy and other documents supporting this guide;
- Ensure that your personnel understands the content, scope and importance of this guide and Jabil’s ABAC Policy;
- Contact Jabil’s Global Compliance department for questions or further guidance;
- Comply with your obligations under Jabil’s ABAC Policy;
- Report any behavior or action that you believe violates Jabil’s ABAC Policy to Jabil’s Global Compliance department.
Your Commitment

FOLLOW THE LAW
Jabil expects you to follow the FCPA, UKBA, our ABAC policy and all applicable anti-bribery and anti-corruption laws. You must have the necessary internal processes to ensure that bribery does not occur. You must inform those of your employees who directly or indirectly, transact business with us or on our behalf of their responsibilities to avoid bribery.

Our anti-bribery and anti-corruption standards are simple: you may not offer, promise, authorize, accept or request anything of value to someone else with the intention of obtaining or retaining business or to secure any improper advantage. Bribery is prohibited regardless the amount, whether or not the other party is a government official, and regardless of whether you believe that the bribe will somehow benefit us.

BE TRANSPARENT
Your business dealings should be openly performed and accurately reflected on your business books and records. Bribery payments are often hidden or disguised in company records to appear as legitimate business payments. You must keep accurate records of your relationship with Jabil (including any gift, entertainment, hospitality or anything else of value), especially invoices and other supporting documentation. You must allow us, under appropriate conditions, to review these records to confirm that these records are accurate.

MONITOR YOUR DEALINGS
We expect that you exercise on-going internal monitoring and review of those processes vulnerable to bribery and corruption. You must implement proper controls in key areas of your company (e.g. accounting department, human resources personnel, sales and procurement employees) with special attention to your offices or subsidiaries located in countries with high level of corruption.

COMMUNICATE OUR POLICY
Jabil expects you to communicate our prohibition on bribery to any party who transact business with us or on our behalf, and as appropriate during their course of their work for Jabil.

BE RESPONSIVE
Jabil requires questionable requests or demands for a bribe to be reported. We ask you to inform our Global Compliance department (by e-mail or phone), or to use the Jabil Global Compliance Hotline (via phone or online) if you are aware, or suspect of an improper demand for payment or other related conduct.

Bribery and Corruption

The risk of corruption is latent in every transaction you make, especially if your company or your subsidiaries are located in a country where corrupt practices involving the government and other public parties are a concern. We want you to exercise caution when dealing with these dangers, stay alert and report to Jabil any event that may give rise to violation of anti-corruption laws.

Use common sense to determine when a bribe is being offered. Below are some questions you should ask yourself if in doubt:

• Am I being asked to pay something or provide any other benefit over and above the cost of services being performed?
• Am I being asked to make a payment for services to someone other than the service provider?
• Are the hospitality or gifts I am giving or receiving reasonable and justified? Would I be embarrassed if someone else learned about them?
• When a payment or other benefit is being offered or received, do I know or suspect it is to induce or reward favorable treatment, to undermine an impartial decision-making process or to persuade someone to do something that would not be in the proper performance of their job?
Government and other Public Parties

Jabil prohibits any payment improperly offered or provided to influence or induce any act or decision of government officials or to secure any improper advantage, and we expect our suppliers to do the same. A “Government Official” is an officer or employee of government or any department, agency, or instrumentality of that government; a political party; a party candidate for political office; a public or quasi-governmental international organization (e.g., United Nations, World Trade Organization); or a person acting on behalf of one of the above persons (e.g., a close advisor, family member or business associate, a consultant retained by a government agency). Public officials include all levels and all ranks of government officials, whether at the federal, state, county or municipal level, even governmental committees or commissions or government controlled businesses. State-owned oil companies, universities, hospitals, and utilities are examples of government instrumentalities.

You must not make any payments directly to a government official, or through a third party with knowledge that the payment will be given to a government official in exchange of a favorable action on behalf of the supplier or Jabil.

Gifts, Hospitality, Charitable and Political contributions

Jabil does not make political contributions and will not reimburse anyone in any way or form for making a political contribution. Suppliers are not allowed to make a political contribution on our behalf of or for our benefit to obtain, or retain business. Lavish or unreasonable gifts, hospitality, or contributions, whether these are given or received, are considered unacceptable if they can create the impression that they are given or received to obtain or receive favorable business treatment. Like our personnel, suppliers must never give or offer a charitable contributions or gifts in order to influence or induce an act or decision by a government official or third party, or to secure an improper business advantage for Jabil.

Facilitating Payments (“Grease Payments”)

Jabil prohibits small payments to government officials to facilitate routine governmental actions. Suppliers must not make the above small payments on our behalf. Jabil prohibits facilitation payments as these are bribes and illegal. If you have doubts about a payment and suspect that it might be considered a facilitation payment, contact Jabil Global Compliance immediately.

Ask Jabil’s Global Compliance

Our relationship with our suppliers is very important to us. If you suspect or observe anything that you think might violate any of our anti-bribery standards, please immediately report such violation to Jabil’s Global Compliance at +1 (727) 803-3030, by email to Global_Compliance@Jabil.com or to www.JabilGlobalCompliance.com. You may also contact our Global Compliance department if you have questions or requests for further information or guidance.

Suppliers who believe that a Jabil employee, or anyone acting on behalf of Jabil has engaged in illegal or otherwise improper conduct, should report the matter similarly to when reporting any potential violation of this Guide. We will handle all inquiries carefully and preserve confidentiality when requesting guidance or reporting a potential violation.

Anti-Bribery and Corruption Certification of Compliance

Suppliers must complete, sign and return the attached “Anti-Bribery and Corruption Certification of Compliance” to Jabil. The Agent or Supplier’s duly authorized representative must complete and sign this certification and return it to Jabil’s Global Compliance department at SCM_Compliance@Jabil.com.
Anti-Bribery and Anti-Corruption Certification of Compliance

CERTIFICATION

The undersigned, a duly authorized representative of ____________________________ ("Supplier"), hereby certifies that:

Supplier has read and understands Jabil’s Foreign Corrupt Practices Act, UK Bribery Act and Anti-Corruption Corporate Policy ("Policy") and Jabil's Anti-Bribery and Anti-Corruption Guide for Suppliers ("Guide").

Supplier has abided by the Policy and the Guide to date and agree to abide by the Policy and the Guide and to review its terms prior to engaging in any of the activities that could possibly be in violation of the Policy or the Guide. If any questions concerning any proposed matter within the scope of the Policy and the Guide arise, Supplier will present them to Jabil for review, prior to engaging in any such transaction or activity.

All agents, employees or subcontractors of Supplier who will be involved in representing Jabil must be identified in writing to Jabil and approved before they perform any actions on behalf of Jabil. A current and accurate written accounting must be kept of all payments made on Jabil’s behalf by Supplier, its agents, employees, and/or subcontractors, or out of funds provided by Jabil. A copy of this accounting must be provided to Jabil upon request. At no time shall any payment be made by Supplier, its agents, employees, and/or subcontractors to any undisclosed third party.

Supplier warrants that its owners, employees, agents and subcontractors are not agents, employees or otherwise affiliated with any government or instrumentality of any government, and that Supplier will inform Jabil of any change in such status. Should Supplier learn of any of the prohibited activities described in the Policy and the Guide, or if there are any changes in the ownership or control of the Supplier, Jabil must be notified immediately.

Supplier agrees to answer promptly, fully, and truthfully any questions from Jabil related to Supplier’s anti-bribery and anti-corruption program controls related to anti-corruption, and to cooperate fully in any Jabil investigation of a breach of this anti-bribery and anti-corruption provision. Jabil reserves the right to audit Supplier’s compliance with the terms of the Policy and the Guide.

Supplier is in receipt of Jabil’s Policy and Guide and agrees to train its personnel in understanding the content, scope and importance of Jabil’s Policy and Guide.

Name of Authorized Representative: ____________________________

Company of Authorized Representative: ____________________________

Title of Authorized Representative: ____________________________

Signature of Authorized Representative _______________ Date ___________