

**Jabil Inc.**  
**GLOBAL ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

**Policy Owner:** Chief Compliance Officer

**Executive Approver:** General Counsel

**Policy Author:** Global Ethics and Compliance Team

**Effective Date:** October 8, 2021

**Function:** Global Ethics and Compliance Team

**Last Review Date:** April 8, 2025

**THIS POLICY SUPERSEDES AND REPLACES ANY PRIOR POLICY ON THIS SUBJECT MATTER**

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**I. PURPOSE**

Jabil Inc., its subsidiaries, and affiliates ("Jabil") are subject to all applicable anti-bribery and anti-corruption laws of countries in which Jabil operates. Jabil is committed to conducting business with integrity and in accordance with these laws. This Policy is intended to assist you in recognizing and avoiding applicable risks and escalating any potential issues so they can be properly addressed by relevant stakeholders.

**II. SCOPE**

This Policy applies globally to all Jabil segments, divisions and business units and to all employees of Jabil Inc. ("Jabil Personnel").

**III. DEFINITIONS**

**Bribe** - the exchange of anything of value to improperly influence another person in order to obtain or retain business or gain a financial or commercial advantage.

**Commercial Bribery** - the exchange of anything of value to improperly influence another person (typically a Commercial Partner) in order to obtain or retain business or gain a financial or commercial advantage.

**Commercial Partner** - any supplier, vendor, customer, partner, subcontractor or downstream manufacturing services provider or other third party with whom Jabil does business or intends to do business.

**Contribution** - a donation of anything of value (monetary or non-monetary) to a person or an organization whether charitable or political in nature.

**Facilitation Payment** - a payment made directly or indirectly to a government official intended to encourage the official to perform or accelerate responsibilities they are already legally obligated to do.

**Family Member** –

- Spouse, domestic or civil partner, or romantic, dating or sexual partner;
- Any degree of relative, including but not limited to children, grandchildren, siblings (of any type), parents, grandparents, cousins, whether related by blood, marriage or adoption;
- In-laws.

**Government Official** -

- Any foreign or domestic official elected or appointed to political office, political party official or candidate for political office;
- An officer or employee of any foreign or domestic government or government agency, department or ministry (examples: tax authority, health or sanitation agency, ministry of energy, national security agency, customs, transportation authority, or labor regulatory agency);

- An employee or official of a government owned or controlled entity (example: state-owned energy company);
- An employee of a public international organization; or
- A person acting on behalf of one of the above persons (example: a close advisor, Family Member or business associate, a third-party consultant retained by a government agency).

*Example:* The management team of a state-owned bank that Jabil seeks to secure financing for a project are considered government officials under this Policy.

#### IV. POLICY

**Jabil Personnel are strictly prohibited from offering, giving, promising, approving, or accepting a Bribe, directly or through a third party, to/from a Government Official or any Commercial Partner.** Jabil Personnel are also prohibited from offering or making Facilitation Payments.

Violations of this Policy could result in disciplinary action (up to and including termination of employment), as well as criminal and civil penalties including imprisonment and substantial fines and penalties against Jabil and the individuals involved.

##### **Red Flags**

Recognizing warning signs or "red flags" is a critical step in complying with this Policy. Certain factors have been identified as indications that a corrupt payment or illegal activity may be at higher risk of occurring. Jabil Personnel may proceed with a commercial relationship exhibiting "red flags" only after consulting with the Global Ethics & Compliance Team directly or using the Integrity Hotline ([www.JabilGlobalCompliance.com](http://www.JabilGlobalCompliance.com)) or sending an email to [Global\\_Compliance@jabil.com](mailto:Global_Compliance@jabil.com).

Some examples of "red flags" are:

- Requests for unusual payments;
- Success fees;
- Cash payments;
- Invoices without appropriate supporting documentation;
- Unusually high commissions;
- Poor reputation of the third-party representative or Commercial Partner;
- Close relationship between the third-party representative or Commercial Partner and a government official, including through affiliation, friendship or Family Member;
- Recommendation from a Government Official to engage a third-party representative or enter into a Commercial Partner relationship;
- Lack of transparency in Jabil's accounting records;
- Third-party representative or Commercial Partner "consulting agreements" that include only vaguely described services;
- Third-party representative or Commercial Partner is in a different line of business than that for which it has been engaged;
- Payments to accounts in countries other than where agent is located or business is to be performed;
- The third-party representative or Commercial Partner making or receiving payment is not a party to the transaction.
- Attempts to circumvent procurement policies, or requests for exceptions to normal procurement processes.

#### A. COMMERCIAL PARTNERS AND THIRD PARTIES OTHER THAN GOVERNMENT OFFICIALS

Jabil Personnel are expected to refuse any offers of Bribes from any Commercial Partner or third party. Jabil Personnel must never offer any Bribe to any Commercial Partner or third party. Even if the Bribe appears to be small, Jabil Personnel must immediately report such attempts to a member of the Global Ethics & Compliance Team, Jabil's Integrity Hotline via [www.JabilGlobalCompliance.com](http://www.JabilGlobalCompliance.com) or by email to [Global\\_Compliance@Jabil.com](mailto:Global_Compliance@Jabil.com). Jabil Personnel may also report these attempts using the contacts delineated in Jabil's [Anti-Commercial Bribery Guideline for Employees](#).

### 1. **Meals, Entertainment, Gifts, and Travel**

Jabil Personnel interacting with any Commercial Partner may accept meals and entertainment in connection with a business relationship with that Commercial Partner, as long as they are reasonable and customary and if the Commercial Partner's employee paying for the meal or entertainment is in attendance. Entertainment must never be sexually oriented or reputationally harmful to Jabil's culture or values. Jabil Personnel may also accept gifts that are modest and customary when the value of the item is less than \$50USD or it is a Commercial Partner branded promotional gift. For more details and examples of items Jabil Personnel are prohibited from accepting from a Commercial Partner, please refer to the [Anti-Commercial Bribery Guideline for Employees](#).

### 2. **Retaining Third-Party Representatives or Entering Commercial Partner Relationships**

The actions of Jabil's third-party representatives and Commercial Partners can create liability for Jabil and Jabil Personnel. It is the responsibility of all Jabil Personnel to ensure that Jabil only does business with reputable and qualified third-party representatives and Commercial Partners, and that services are retained in conformance with the Global Procurement Policy and the Global Partner Lifecycle Policy. Jabil Personnel must be able to identify and address anti-corruption "red flags" that may be created by such parties. Conducting appropriate due diligence into the background, qualifications, and reputation for ethical conduct for such parties will help prevent violations of this Policy.

### 3. **Government-Facing Third-Party Intermediaries**

Third Parties acting on Jabil's behalf or assisting Jabil in government-facing interactions or transactions (e.g. subsidy applications, taxes, legal representation, regulatory consulting) present a heightened risk. In such circumstances, engagement decisions **must always follow the Global Procurement Policy, the Global Partner Lifecycle Policy, and all other applicable Jabil policies, and be made in consultation with the Global Ethics & Compliance Team**. The following practices should be followed when assessing and retaining government-facing intermediaries:

- Direct interactions between intermediaries and government officials should be limited, done only with pre-approval by a member of Jabil's Global Ethics and Compliance Team, and Jabil employees should be present if practical.
- Compensation for government-related services using exclusively success fees is prohibited.
- Government-facing intermediaries should undergo competitive bidding pursuant to Global Procurement Policy requirements as well as comprehensive anti-corruption due diligence prior to award.
- Proper terms and conditions (e.g. audit rights, anti-corruption commitments) must be included in the contract.
- Services must be clearly articulated and commensurate with the fees and expenses incurred.
- In the event any supplier is recommended by a government official, Global Ethics & Compliance and Global Procurement must be consulted as part of qualification and before bidding / award phase, regardless of contract amount.

Jabil's General Counsel is the only person authorized to hire lobbyists in any country to assist the Company.

## **B. GOVERNMENT OFFICIALS**

Jabil Personnel are strictly prohibited from offering or receiving any Bribe from any Government Official whether it is in the form of cash, services, gifts, meals or business entertainment, among others.

There may be a multitude of contacts with government officials because of routine reviews, audits, or inspections. In these dealings, Jabil Personnel must always act with integrity and avoid the appearance of impropriety. Jabil Personnel must also be alert to any "red flags" as described above. Jabil Personnel must immediately report any behavior with a government official they may deem inappropriate to the Global Ethics & Compliance Team, Jabil's Integrity Hotline via [www.JabilGlobalCompliance.com](http://www.JabilGlobalCompliance.com) or by email to [Global\\_Compliance@Jabil.com](mailto:Global_Compliance@Jabil.com).

There are certain interactions that bring increased risk to Jabil. Although rare, from time to time, these interactions may be necessary for legitimate business purposes. Below are some examples of these higher risk interactions:

- Sponsored travel for government officials
- Government official travels to Jabil sites outside their jurisdiction
- Ceremonies where a government official will be in attendance
- Dealings related to government incentive programs (e.g. tax benefits/rebates, land use incentives, sustainability credits)

In these instances, Jabil Personnel should contact a member of the Global Ethics & Compliance Team, Jabil's Integrity Hotline via [www.JabilGlobalCompliance.com](http://www.JabilGlobalCompliance.com) or [Global\\_Compliance@Jabil.com](mailto:Global_Compliance@Jabil.com) for guidance.

### **1. Meals and Business Entertainment for Government Officials**

Payments for meals and business entertainment for Government Officials and third-party representatives must be appropriate, reasonable, and directly related to a legitimate business purpose. Entertainment that is sexually oriented or reputationally harmful to Jabil's culture and values are strictly prohibited.

Jabil Personnel should determine whether the person they are preparing to have dealings with is a Government Official and any meal, business entertainment or activity must not violate this Policy or local law and must never be incurred to improperly induce a Government Official to do something or refrain from doing something for Jabil. The expense must be properly financed (use a Jabil Credit Card if possible), supported by appropriate documentation (including receipts), and properly recorded in Jabil's books and records in accordance with Jabil's [Global Travel and Entertainment Policy](#). For example, an expense voucher for a meal with a Government Official must accurately report the date, the names and titles of all attendees (including the Government Official), and the business purpose of the meal. All meals and entertainment expenses with Government Officials require the advance authorization of a Regional Controller.

*Example:* A Jabil employee takes a local Government Official to a lavish dinner to ask them to circumvent the required environmental inspection process for their facility. This would be a violation of the Policy because it is an unreasonable expense and we are asking the Government Official to avoid doing an inspection they are required to do.

### **2. Gifts for Government Officials**

Jabil discourages gift giving to Government Officials, and gifts must never be used to

improperly induce a Government Official to do something or refrain from doing something for Jabil. In some instances, it may be permissible to provide a token gift or Jabil-branded promotional product to a Government Official as a gesture of goodwill or for holidays and culturally accepted occasions. However, the gift must be under \$50 USD, permitted under local law, and accurately recorded in Jabil's books and records. Gifts to Government Officials must be infrequent, and the aggregate annual amount given to any individual, group, or department must be reasonable and customary. All gifts for Government Officials, other than a Jabil-branded promotional product with a value under \$50 USD, require the advance authorization of the Global Ethics & Compliance Team using Jabil's Integrity Hotline ([www.JabilGlobalCompliance.com](http://www.JabilGlobalCompliance.com) or [Global\\_Compliance@Jabil.com](mailto:Global_Compliance@Jabil.com)).

Some gift restrictions include:

- No cash gifts or gift cards of any amount;
- The value of the gift must be reasonable, appropriate, and never create an appearance of bad faith or impropriety; and
- The frequency of gift giving is reasonable and appropriate. Regardless of value, the aggregate occurrences of gift giving must never create an appearance of bad faith or impropriety.

*Example:* Appropriate gifts may include an inexpensive food basket, flowers, candy, an inexpensive bottle of wine, or Jabil branded promotional items such as golf shirts, caps, windbreakers or fleece jackets, or golf balls. However, providing any of these items on a regular basis (e.g. weekly, monthly, etc.) would violate the Policy based on the rate of occurrence.

### **3. Travel for Government Officials**

Coverage of reasonable travel expenses for Government Officials may be permissible under very narrow circumstances (e.g., the expenses directly relate to the promotion, marketing, or explanation of Jabil's services, and capabilities). Such travel expenses require advance authorization of the Global Ethics & Compliance Team. Travel expenses must be reasonable (non-extravagant) and directly related to a legitimate business purpose.

*Example:* Jabil must never cover the cost of a sightseeing side trip for a Government Official or expenses related to a Government Official's Family Member or friend. Travel expenses must never be provided to improperly induce a Government Official to do something or refrain from doing something for Jabil.

Travel expenses must be properly financed, and recorded, consistent with Jabil's [Global Travel and Entertainment Policy](#) as well as the Government Official's local laws. Proper financing and recording includes documentation of the Government Officials who are traveling and the business purpose of the trip. To the extent possible, travel should be arranged using Jabil's travel agencies and charged directly on a Jabil Credit Card. Jabil prohibits cash advances to Government Officials.

### **4. Political or Charitable Contributions**

A contribution to a political candidate, or even a contribution made to a charity associated with a Government Official, is considered a benefit to that Government Official. As such, Jabil strictly prohibits any:

- Contributions made on behalf of Jabil to candidates for any political office as well as contributions to a charity associated with a politician, political party or candidate;
- Endorsement by Jabil of a political party, ballot initiative, Political Action Committee, or candidate;

- Publication of Jabil's official position on any legislation, regulation, or government action without the authorization of Jabil's General Counsel; and
- Jabil's General Counsel is the only person authorized to hire lobbyists in any country to assist the Company.

Jabil Personnel must never pressure, reward, or solicit other employees or Commercial Partners to make political contributions. Jabil Personnel must not seek reimbursement from Jabil or a third party for any personal political or charitable contribution.

Jabil Personnel may participate in political activities on a personal basis, using their own money, resources and time. The contributions must never be offered to obtain a business advantage for Jabil and they must comply with all applicable local laws.

Jabil empowers its employees to volunteer, donate or share their expertise to bring about positive change to communities around the world in support of Jabil Cares' community outreach efforts. Jabil Personnel must reference Jabil's [Charitable Donations Policy](#) for further guidance.

#### **C. FACILITATION PAYMENTS**

Facilitation Payments are forbidden under this Policy. If an employee discovers that a Facilitation Payment has been made by someone on Jabil's behalf, the employee must contact the Global Ethics & Compliance Team directly or using Jabil's Integrity Hotline ([www.JabilGlobalCompliance.com](http://www.JabilGlobalCompliance.com) or [Global\\_Compliance@Jabil.com](mailto:Global_Compliance@Jabil.com)) immediately.

#### **D. PERSONAL SAFETY AND SAFE PASSAGE**

Payments made to ensure the personal safety and safe passage of Jabil Personnel while on business travel are permissible without prior approval. The payment must be made to prevent imminent danger or physical harm. Jabil Personnel must notify their supervisors and the Global Ethics and Compliance Team via the Jabil Integrity Hotline regarding the nature of the payment as soon as practicable. Jabil Personnel may also notify Global Security at their site.

#### **E. DUE DILIGENCE**

Supervisors are responsible for overseeing appropriate due diligence pertaining to third-party representatives and Commercial Partners who act on behalf of Jabil in interactions with Government Officials. Such due diligence is required at the start of a new engagement or business relationship and at any time such engagement or relationship is being renewed or extended, pursuant to the Global Procurement Policy, the Global Partner Lifecycle Policy and other applicable Jabil policies.

### **V. JABIL BOOKS AND RECORDS/INTERNAL CONTROLS REQUIREMENTS**

#### **A. KEEP ACCURATE BOOKS AND RECORDS; MAINTAIN ADEQUATE INTERNAL CONTROLS**

Jabil is required to make and keep books and records that accurately and fairly reflect payments, expenses, and disposition of assets. Jabil is also required to develop and maintain a system of internal accounting controls for payments, expenses and disposition of assets. Jabil Personnel must reference Jabil's [Charitable Donations Policy](#) for further guidance.

Jabil Personnel are prohibited from making false and misleading entries into Jabil's books and records. In order to ensure continued compliance with this Policy, all Jabil transactions must:

- Have proper management authorization; and

- Be accurately recorded in a transparent manner with clear description.

## **B. EXAMPLES OF PROBLEMATIC RECORD KEEPING**

- Describing a payment made on behalf of Jabil to a Government Official or third party as a "Miscellaneous Fee" in an accounting entry;
- Making false entries into Jabil's books and records;
- Using or causing someone else to use Jabil funds for an illegal or unauthorized purpose;
- Creating or using an off-the-books or "slush" fund;
- Altering or falsifying a document, invoice or expense in support of a request for payment; and/or
- Developing or maintaining a separate set of accounting books or records outside of Jabil's accounting systems.

*Example:* An employee takes the Mayor of the local city to an inexpensive dinner to discuss the company's involvement in community affairs and lists such expenses as a "Miscellaneous Fee" on his expense report, with no record of his dinner guest or the business purpose of the meal. This is a violation of the books and records requirements of this Policy.

## **VI. REPORTING VIOLATIONS AND SUSPECTED MISCONDUCT**

### **A. MAKING A REPORT**

Jabil has an "open door" policy, formalized in the Code of Conduct, strongly encouraged through our management structure, and reinforced under the Jabil "Rules of the Road." Jabil Personnel and Commercial Partners who have concerns or information about a suspected violation or attempted violation of this Policy (including Bribe attempts that were refused) **must** report to the Global Ethics & Compliance Team or to Jabil's Integrity Hotline. Reports can be made to Jabil's Integrity Hotline via the internet at [www.JabilGlobalCompliance.com](http://www.JabilGlobalCompliance.com), via email at [Global\\_Compliance@jabil.com](mailto:Global_Compliance@jabil.com) or by phone 24 hours a day in any language.

Alternatively, in the event of a suspected violation of the Anti-Commercial Bribery Guidelines, you may notify designated regional leaders of the Global Procurement Team. (Any supervisor or other employee to whom such a report was made must promptly notify the Global Ethics and Compliance Team).

### **B. PENALTIES FOR FAILURE TO COMPLY**

Failure to comply with this Policy could subject Jabil Personnel to disciplinary action up to and including termination. Third party representatives and Commercial Partners could be subject to contract termination and denial of access to Jabil business. Individuals who violate the laws that support this Policy are subject to civil and criminal penalties, including imprisonment and/or restitution of any funds illegally obtained. Jabil and other companies that violate these laws could receive substantial fines and penalties, loss of business operating privileges, and reputational harm among other costly consequences.

### **C. QUESTIONS**

If you have any questions or concerns regarding a particular transaction or need clarification in any way regarding this Policy, please contact any member of the Global Ethics & Compliance Team directly or using Jabil's Integrity Hotline ([www.JabilGlobalCompliance.com](http://www.JabilGlobalCompliance.com) or [Global\\_Compliance@Jabil.com](mailto:Global_Compliance@Jabil.com)).

## **VII. NO RETALIATION**

Jabil strictly prohibits retaliation against anyone for:

- Using the complaint procedure described in this Policy;
- Good faith reporting of conduct in violation of this Policy or any other Jabil policy, Code of Conduct, or law; or
- Filing, testifying, assisting with or participating in any investigation, proceeding, or hearing conducted by Jabil or a governmental enforcement agency.

Prohibited retaliation is broadly defined, and includes, but is not limited to termination, demotion, suspension, failure to hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

## **VIII. USE WITH OTHER JABIL POLICIES AND PROCEDURES**

This Policy references other Jabil policies with which all Jabil personnel are required to comply. Jabil policies are available on JabilWeb, and they include:

- Jabil Code of Conduct
- Jabil Global Travel & Entertainment Policy
- Jabil Anti-Commercial Bribery Guidelines for Employees Interacting with Suppliers and Vendors
- Jabil Anti-Retaliation Policy
- Jabil Global Procurement Policy
- Jabil Global Partner Lifecycle Policy
- Jabil Charitable Donations Policy