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# A Message from Mike Dastoor



At Jabil, we strive each day to make a positive impact on the world, be it through the range of products we manufacture for our customers or through our engagement in our communities.

Our values-based culture of trust, accountability, and integrity serves as the foundation for everything we do. It influences our interactions and drives innovation and promotes environmental stewardship. These core principles are crucial to our success and permeate every aspect of our operations.

To promote and develop our culture and values, I am excited to introduce Jabil's Code of Conduct (Code), a pivotal document that articulates the standards and values underpinning our organizational conduct and decision-making processes. The Code establishes clear expectations for all employees, from our leadership team to our newest recruits, emphasizing interactions with colleagues, customers, and the broader society.

Our Code is more than just a set of rules; it serves as a mirror reflecting our values and dedication to conducting business in a manner that benefits all stakeholders. By upholding these standards, we cultivate trust and assurance in our company and foster an inclusive, respectful, and secure workplace for all. I encourage every employee to explore and internalize the Code, embodying its principles in all their work. I encourage every leader in the company to not only set the tone at the top in their respective areas and sites but to lead as an example to others.

While the Code may not cover every scenario you encounter, I urge you to raise any questions or issues with your immediate supervisor, an HR representative, or the Global Ethics and Compliance Team. We encourage a "Speak Up" culture at Jabil and we have zero tolerance for retaliation against anyone who reports a problem in good faith or participates in an investigation.

As we strive to be the most technologically advanced and trusted manufacturing solutions provider, I ask each of you to uphold the highest standards of ethics and values in all your actions and words. The reputation of our organization relies on the personal integrity displayed by every member of our team.

I extend my sincere gratitude for your support and dedication as we collectively steer Jabil towards continued success. Together, let's always do the right thing and lead with integrity.

#### Mike Dastoor

CEO. Jabil

# **Our Business Values**

# Integrity

#### **Our Cornerstone**

The cultural cornerstone of the way we do business is our integrity. All interactions with customers, 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 inclusion, 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 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.

Our Code

Integrity — It's Our Code

#### In This Section:

- Know Our Code
- Your Responsibilities
- Make the Right Decision
- Speak Up We're Listening





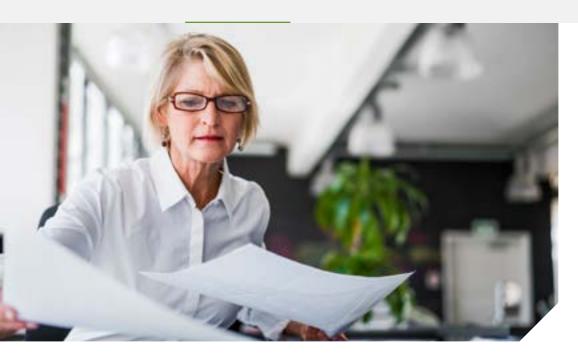
## Our Code

The Code is not intended to cover every situation. It provides the baseline standard of conduct, so that everyone connected to our Company knows what is expected of them. Contact the Global Ethics and Compliance Team or any of the other resources listed in this Code if you need additional information or guidance.

# Who Must Follow Our Code

Everyone who works at Jabil or any of its global subsidiaries must follow our Code, policies and procedures. This includes employees, officers and directors.

We also expect anyone acting on behalf of Jabil to follow our Code and compliance policies. This includes suppliers, consultants, agents, sales representatives, distributors and independent contractors.



# **Your Responsibilities**

# Integrity

Act with integrity and behave in a professional and ethical manner. Your behavior reflects on all of us and on Jabil's reputation.

## Report

Report suspected illegal or unethical behavior using the resources listed in this Code. Even if you are unsure about a situation, reach out and ask for guidance.

# Pay Attention

Be familiar with the information contained in this Code and related policies. Pay attention to the policies that apply to your job.

### Remember

Remember, there is never an excuse for violating the law, our Code or any Jabil policy.

# Additional Responsibilities of Jabil Leaders

In order to promote awareness of this Code and associated policies, Jabil conducts an annual Global Code of Conduct Training, as well as periodic trainings on specific policies. All managers are expected to hold their organizations accountable for full participation and completion of these trainings.

Leaders and supervisors have additional duties to help us meet our high standards of integrity:

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

# **Make 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. 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?

Have I considered all the possible options? Is my decision consistent with our values, our Code, Company policies and the law? What would my family, friends, neighbors and co-workers think of my actions?

Do I have all the information I need?

Have I thought through the consequences and the risks involved, including the impact on other employees and customers?

Do I understand the legal issues that may be involved, or do I need to consult with the Legal Department?

Would I be comfortable describing my decision at a Company meeting?

Am I really unsure about what to do, or am I reluctant to do what I know is right?

What effect will my decision have on Jabil's reputation?

Would I feel comfortable reading about my decision in the media?

Is there someone within Jabil that I should turn to for help?

# Speak Up - We're Listening

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



# How to Make a Report

Doing your part to speak up is important to Jabil. We want all employees to feel comfortable when reporting a concern. You do not need to have all the facts. If you see or suspect unethical or illegal behavior, or if you have a question, you can:

#### **Use our Open-Door Policy**

 Our open-door policy was created so that any employee can raise a concern to those they trust.

#### Speak to someone

- If you have a question or would like to report a concern, think about discussing
  the issue with your supervisor, if you feel comfortable. You may also speak
  to any other member of management, Human Resources or the Legal
  Department. Contact the Global Ethics and Compliance Team:
  - Our Global Ethics and Compliance Team is part of the Compliance
     Office and Legal Department. They are here to listen and help. They have
     teammates in all Jabil regions who are dedicated to reviewing concerns
     reported to Jabil. They will review your concern and take the appropriate
     action.
  - You can contact the Global Ethics and Compliance Team by emailing <u>Global\_Compliance@jabil.com</u> or reaching out directly to a <u>Global Ethics</u> and Compliance member in your region.

#### **Contact Jabil's Integrity Hotline Online**

- Our Integrity Hotline has an online reporting channel. You can scan the QR code in our Code of Conduct or on a Jabil Integrity Hotline poster located in your facility, or visit jabilglobalcompliance.com. You can remain anonymous where allowed by local law.
- Your report will be sent to Jabil's Global Ethics and Compliance Team for further review and action.
- We may need additional information from you. You can choose to remain anonymous and provide an email address so that an investigator may contact you via an encrypted communication route. This means that you will have a direct way of communicating with the investigator, but the investigator will not have your contact information or know your identity.

#### **Contact Jabil's Integrity Hotline Call Centers**

- Our Integrity Hotline has local call centers for every Jabil country. Our local call centers
  are staffed by third-party compliance specialists and can provide translations in all Jabil
  languages. Our specialists are trained to listen, ask questions if necessary and then write
  a report. The report will be provided to the Global Ethics and Compliance Team for further
  review and action. You can make your report anonymously where allowed by local law.
- You can find your country-specific phone number on the Jabil Integrity Hotline posters that are in your facility, or you can find a full list of all numbers at jabilglobalcompliance.com.
- We may need additional information from you. You can choose to remain anonymous and provide an email address so that an investigator may contact you via an encrypted communication route.

#### **Contact a Compliance Ambassador**

- It can be helpful to turn to a trusted employee who speaks your language. To address
  this, we created local Compliance Ambassadors available at several sites (see here if your
  site has one). They are trained by the Global Ethics and Compliance Team to listen to
  colleagues who might not feel comfortable raising concerns to management or through
  the Jabil Integrity Hotline.
- If needed, the local Compliance Ambassador will confidentially share information to the Global Ethics and Compliance Team for further review and action.





# Investigations and Confidentiality

Information provided through the Jabil Integrity Hotline or any other reporting channel will be treated as confidential to the extent possible. Investigations will be conducted by the Global Ethics and Compliance Team and may 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 investigations unless directed by the Global Ethics and Compliance Team. Jabil personnel are required to fully cooperate with all investigations.

### Zero Tolerance for Retaliation

Jabil will not tolerate retaliation against anyone who reports a problem in good faith or participates in an investigation. If you believe you experienced or witnessed retaliation, report it to the Global Ethics and Compliance Team.

Reporting "in good faith" means 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 result in legal proceedings, penalties or criminal prosecution.

Our People

**Empowered by Integrity** 

We'll always try to "Do What's Right" in how we interact with each other.

#### In This Section:

- We Respect Each Other
- We Keep Our Workplaces Safe, Healthy and Secure
- We Protect the Environment
- We Safeguard Employee Personal Information



# We Respect Each Other

#### Our Commitment

All employees are entitled to go home safely and to work in an inclusive and respectful environment that is psychologically safe — free from harassment, bullying or discrimination of any kind. We are committed to equal employment opportunity. We prohibit discrimination or harassment based on any characteristic protected by law.



#### What It Looks Like

Harassment comes in many forms. It can be:

- What we say or write (to another person or on social media), including:
  - Racial, ethnic or gender-based slurs
  - Jokes or stereotypes
  - Threatening, loud or abusive language
- What we do, such as:
  - Unwelcome touching
  - Sexual advances
- What we display, such as:
  - Pornographic or sexually suggestive materials
  - Potentially offensive slogans, posters or bumper stickers

When it comes to harassment, the question isn't what we mean or intend by our words or actions, but how others might perceive them.

# Why It's Important

Our inclusivity makes us stronger. A safe and supportive work environment leads to increased creativity and productivity.

# How We Do the Right Thing

- Value culture and belonging.
- · Create an open, respectful and collaborative culture.
- Keep an open mind to new ideas and listen to the viewpoints of others.
- Take a stand against offensive messages, comments or inappropriate jokes.
- Comply with applicable employment, labor and immigration laws.
- Report any observed or suspected harassment to a manager, Human Resources, or the Jabil Integrity Hotline.



Global Anti-Harassment and Anti-Discrimination Policy

Sexual Harassment Campaign Video

Have a question? Contact the Global Ethics and Compliance Team



#### **Protected Characteristics**

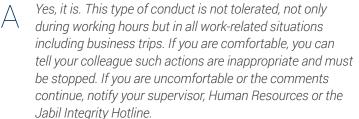
#### Protected Characteristics include:

- Race
- Religion and religious practices
- Creed
- Color
- National origin
- Sex
- Marital status
- Age
- Physical or mental disability

- Medical condition
- · Genetic information
- Ancestry
- Veteran status
- Or any other characteristic protected by law.

#### Doing the Right Thing - In Action

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?



# We Keep Our Workplaces Safe, Healthy and Secure

#### **Our Commitment**

The physical and mental health of our people is our first priority. We look out for one another to ensure that our co-workers, contractors and visitors are safe.

# Why It's Important

Nothing is more important than keeping everyone safe, healthy and secure. We have a shared and individual responsibility to be vigilant, follow procedures and speak up if something causes concern.

## How We Do the Right Thing

- 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.
- Do not conduct Jabil business when impaired by alcohol or any drugs, including prescriptions and over-the-counter medications.
- Never email, check the Internet or text while driving on Company business.
- Help contractors and business partners understand and follow our safety and environmental procedures.
- · Alert your supervisor about any unsafe conditions.
- Report job injuries to a supervisor immediately, no matter how minor. Never assume that someone else has made the report.
- If you are a supervisor, never pressure employees to not report workplace injuries.

#### 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 in any of Jabil's facilities.

# **We Protect the Environment**

#### Our Commitment

Jabil is committed to sustainability in our operations. We meet or exceed applicable environmental legal requirements and work to continuously improve our environmental performance. We do this through resource conservation, waste minimization, efficient energy and water use, and effective materials and chemicals management. We transparently discuss and report on verified performance of our key sustainability objectives.



### Why It's Important

We strive to be industry leaders in environmental sustainability. We understand that business operations and activities can have an inherent impact on the environment that all life depends on to survive and thrive. We continually endeavor to minimize our impact in various ways.

We use data-driven techniques to identify our sustainability priorities and transform them into meaningful action. We integrate these considerations into our business, taking into account the well-being of our employees, the environment and society while fostering responsible economic growth.

# How We Do the Right Thing

- Entrench a culture of compliance with laws, policies, permits and regulations as well as industry best practices aimed at:
  - Preventing pollution.
  - o Proactively managing environmental risks.
  - Conserving energy, water and other natural resources.
  - Reducing the impact of our operations on the natural environment.
- Report to local management 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.
- Encourage and support our external partners and other stakeholders to look for ways to reduce their environmental footprint.

#### Sustainability at Jabil

Our three pillars form the foundation of our global sustainability efforts. Within each pillar, we've identified focus areas where we believe we can make the biggest impact:

#### **Our People and Communities**

Focusing on the health and well-being of our people and the communities in which we operate.

#### **Our Operations and Resources**

Ensuring we operate and manage resources in our sites as efficiently as possible.

#### **Our Innovative Solutions**

Delivering sustainable innovations throughout the product lifecycle.

Our key social and environmental sustainability focus areas include:

- · Employee health, safety and well-being
- Climate change and circular economy
- Air emissions and waste management
- Energy and water efficiency
- Materials and chemicals management
- Social responsibility



# We Safeguard Employee Personal Information

#### Our Commitment

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.



# Why It's Important

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

## How We Do the Right Thing

- · Keep personal information safe and secure.
- Collect, access and use personal information for legitimate business purposes only.
- Use care when providing confidential personal data to anyone inside or outside of Jabil. In addition, limit access to authorized individuals
- Process personal information that is relevant and limited to what's necessary and retain it only for as long as necessary.
- · Maintain accurate and up-to-date personal information.
- Make sure third parties understand the importance we place on privacy.
- 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.



Privacy Policy

Data Subject Right Request

Have a question?
Contact the
Global Ethics and
Compliance Team



#### Doing the Right Thing - In Action

- I accessed a file on my computer that contains employee personal data. I don't think I should have access to this information. What should I do?
  - You should let your manager or Human Resources know immediately. Exit the file and do not download any information that could be considered an employee's personal data.
- I sometimes answer Jabil-related calls and emails while in the airport traveling on Company business. Is that allowed?
- It could pose a security risk. Avoid discussing confidential or sensitive Jabil information in public. When working in a public space, always connect to the company VPN and be sure that no one can see what's on your screen.
- An employee mistakenly sends an email containing sensitive customer information to the wrong recipient due to a typographical error in the email address. The unintended recipient now has access to this data. What should the employee do?
- Immediately inform your immediate supervisor or manager and the Global Ethics and Compliance Team about the incident. They can provide guidance and escalate the matter to the appropriate individuals within the organization. If the email system allows for message recall, attempt to recall the email immediately. However, note that this feature doesn't guarantee success, and the recipient may have already seen the email. A prompt reaction is key to mitigate the risk.

Our Company

**Built on Integrity** 

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

#### In This Section:

- · We Maintain Accurate Records
- We Respond to Legal Proceedings Appropriately
- We Safeguard Jabil Information
- We Do Not Disclose or Trade on Material, Non-Public Information
- We Use Company Assets Wisely and Respond to Cybersecurity Incidents Responsibly
- We Communicate About Our Company and Use Social Media Responsibly
- We Use Technology Ethically



# We Maintain Accurate Records

#### Our Commitment

We maintain accurate, timely and complete books and records in compliance with applicable accounting principles (i.e., U.S. GAAP and local requirements) and our internal controls. Employees with finance or accounting jobs have a special responsibility in this area. However, all of us contribute to the process of maintaining accurate records.

# Why It's Important

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

All Jabil employees are considered custodians of the records which they create. Not following our Records Management Policy can have serious consequences for Jabil.

# How We Do the Right Thing

- · Make sure all contracts are accurate and fully executed.
- Make sure 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 unsure of the accuracy of information in a Company record.
- Never make false claims on expense reports or time sheets.
- · Never alter or falsify documents or omit information to mislead others.
- Make sure all records are created, categorized, stored, retained and destroyed according to our policy and record retention schedules.
- Contact <u>Records\_Program\_Manager@Jabil.com</u> with any questions about handling records.

#### 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 receipt. Do not alter or discard information. Contact the Legal Department if you have any questions.



Records Management Policy

Jabil Records Management Program FAQ

Anti-Commercial Bribery Guidelines

Accurate Record Keeping Video

Have a question? Contact the Global Ethics and Compliance Team

# We Respond to Legal Proceedings Appropriately

#### **Our Commitment**

We will appropriately respond to all formal legal claims and regulatory inquiries. The Legal Department is 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.



#### What It Looks Like

There are many types of legal claims and regulatory inquiries. Examples include:

- Summonses
- Complaints
- Subpoenas
- Official regulatory correspondence

If you receive any of these documents, or any non-routine government or legal request, immediately forward the information to the Legal Department

### Why It's Important

We always act with integrity and honesty. We uphold our reputation by handling legal proceedings with care through the approval of the Legal Department.

## How We Do the Right Thing

- If 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.
- Never give information to outside parties in connection with legal inquiries without the written approval of the Legal Department.
- Never try to obstruct the collection of information, data, testimony or records.
- Never mislead any investigator or other government or regulatory official.

# We Safeguard Jabil Information

#### Our Commitment

We do our utmost to protect Jabil Information. This includes the confidential, restricted, and regulated information of our Company, customers and business partners. This commitment ensures continued success in developing new products and services.



# Why It's Important

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

## How We Do the Right Thing

- Use and disclose confidential, restricted and regulated information only for legitimate business purposes and on a need-to-know basis.
- Properly label Jabil information using the Global Digital Information Classification Policy and End User Digital Information Handling Standard to indicate how it should be handled, distributed and destroyed.
- Don't share individually assigned account passwords or allow other people, including friends and family, to use our information technology resources.
- Don't 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.
- Only use approved, Jabil licensed software to store or transfer files, share documents or collaborate.
- Don't use personal email or personal shared drives to transfer, store, or share Jabil data files, or for Jabil business and collaboration.
- Don't disclose information to third parties, including business partners and suppliers, without the appropriate authorization and required confidentiality agreements. If in doubt, check with your supervisor or the Legal Department.
- Never discuss confidential, restricted or regulated information in public places where others



### What It Looks Like

#### may overhear

Here are some examples of different kinds of protected information:

# Examples of **confidential information** include:

- Budgets
- General security program management and operational documentation
- Supplier contracts
- Company organization charts
- Policies
- Inventory storage locations
- Training material
- · Risk analysis results
- Internal and customer audit reports
- IT information

#### Examples of **restricted information** include:

- Executive strategic plans
- · Financial results prior to release
- Corporate tax information
- Pricing data
- Executive memos with sensitive nonpublic content
- Customer information

- Competitive advantage intellectual property
- Legal data

#### Examples of regulated information include:

- Personally Identifiable Information (PII)
- Private Health Information (PHI)
- Payment Card Industry (PCI)
- International Traffic in Arms Regulations (ITAR)
- Sarbanes-Oxley Act (SOX)
- Customer IP (Intellectual Property) determined by customer contract

# **Jabil 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
- Discussed during meetings and/or telephone conversations



#### Jabil Information or Intellectual Property

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

**Take reasonable precautions to minimize the chance of an unintentional disclosure of sensitive information.** For example:

- Use strong passwords and do not write them down.
- · Secure your computer and workstation.
- · Use Jabil-approved applications for storage and collaboration.
- · Never leave your laptop or mobile phone unattended, particularly when traveling.

If you have questions or concerns about the appropriate use of Jabil information or intellectual property, please contact Global Ethics and Compliance or the Global Cybersecurity & IT Compliance Team.





Global Digital
Information
Classification Policy

End User Digital Information Handling Standard

Have a question? Contact the Global Ethics and Compliance Team

# We Do Not Disclose or Trade on Material, Non-Public Information

#### Our Commitment

We uphold our commitment to act ethically by never using or sharing material, non-public information about Jabil or any other company for the purpose of buying or selling securities.



## Why It's Important

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 unfair to other investors and illegal.

# How We Do the Right Thing

- Know the kinds of information considered material, nonpublic information.
- Never buy or sell 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.
- If you have any questions about whether information is material and non-public, contact the Legal Department.



Insider Trading Policy

Related Party
Transaction Policy

Fair Regulation Disclosure Policy

Have a question?
Contact the
Global Ethics and
Compliance Team



#### What It Looks Like

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.

Examples of non-public information can include information about:

- Mergers or acquisitions
- · Sales or earnings results
- Financial forecasts
- Changes to the executive management team
- Pending material lawsuits
- Major business wins or losses



#### Doing the Right Thing - In

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?

No. You cannot buy the supplier's stock until the information you have is publicly available. You currently have material non-public information that 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.

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?

The interpretation of what is material, nonpublic information can be complicated. You should contact the Jabil Legal Department.

# We Use Company Assets Wisely and Respond to Cybersecurity Incidents Responsibly

#### **Our Commitment**

Jabil's success over the long term requires that we protect and use our assets wisely. We must be vigilant in protecting them from loss, damage, theft, waste and improper use.



## Why It's Important

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. How we protect them varies depending on the type of asset and our particular role. We always make sure to safeguard one of our most essential assets: Jabil's reputation.

### How We Do the Right Thing

- 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.
- All social media platforms (e.g. WeChat, TikTok, Facebook, Instagram, etc...) are not approved by Information Security for business use beyond their use with public information. Jabil data should only reside on Jabil approved devices and locations.
- Limited personal use of Company phones and email is allowed as long as it does not have a negative impact on your performance, productivity or 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.

# Jabil Property

Information or data created, received or maintained on Jabil assets, such as computer files, emails, chats or text messages, 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.





#### What It Looks Like

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)
  - Other associated devices, systems, networks and their contents
- Jabil physical property, such as:
  - Facilities
  - Equipment
  - Tools
  - Vehicles
  - Inventory
  - Scrap or obsolete materials and supplies
- Other corporate asset types, such as:
  - Financial resources
  - Intellectual property
  - o Confidential, restricted and regulated information
  - Paper and electronic files and documents
  - Branding and logos

#### Cybersecurity

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

- Follow our policies and practices designed to protect our networks, computers, programs and data from attack, damage or unauthorized access.
- · Protect usernames 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.
- Be wary of emails or chats with unusual requests, even if they come from someone you recognize.

If you see something, say something! Report suspicious activity immediately to the <u>Global Ethics</u> and <u>Compliance Team</u>, your direct manager or



Global Digital Information Classification Policy

Information Security Policy

Global Information Security Incident Management Policy

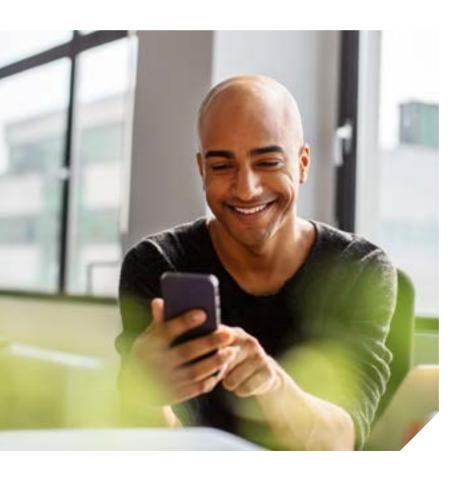
Software Asset Management Policy

Have a question? Contact the Global Ethics and Compliance Team

# We Communicate About Our Company and Use Social Media Responsibly

#### Our Commitment

Social media is a powerful communication tool. We seek to harness that power to create honest, direct, and meaningful connections with customers and other stakeholders.



## Why It's Important

Social media can have both positive and negative impacts. We recognize that exchanges can be taken out of context, distorted or misunderstood. That's why we are careful when creating public profiles and writing external communications.

# How We Do the Right Thing

- 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 harmful to Jabil, report it to the Jabil 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. Express ideas and opinions in a respectful manner.
- Think carefully before you hit the "post" or "publish" button on any social media platform.

### Sensitive Topics

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.

#### Doing the Right Thing - In Action

I have included Jabil as my employer on Facebook.
Is it appropriate for me to post personal opinions about Jabil customers and suppliers?

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 Enterprise Marketing and Communications Department.



# We Use Technology Ethically

#### Our Commitment

We are ethical and honest when using generative AI and other technological innovations.



# Why It's Important

Generative AI can be a powerful tool to enhance productivity and creativity. However, it and other technological innovations come with risks and ethical concerns. We take care to use these tools with integrity, to benefit Jabil and society.

## How We Do the Right Thing

- Never use generative AI to create content that infringes on the intellectual property rights of others. This includes copyrighted material, trademarks, or patents.
- Never use AI to create harmful or discriminatory content.
- Test the results of AI tools for accuracy and appropriateness before using them.
- Employees may use publicly hosted tools only with public information in accordance with our Company policies, as long as no competitively sensitive, Jabil-owned, or customer data or information is used.
- No third-party hosted solution is approved for use with competitively sensitive, Jabil-owned, or customer data or information unless there is an enterprise-procured contract in place with the solution's provider.
- Make sure to protect data privacy when using Al tools.
   Watch for and report potential issues when using any Al tools to the Global Ethics and Compliance Team.



Data and Artificial Intelligence (AI) Policy

Global Acceptable
Use Policy

Have a question?
Contact the
Global Ethics and
Compliance Team



Making Solutions Possible with Integrity

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

#### In This Section:

- We Avoid Conflicts of Interest
- We Follow Our Gifts and Entertainment Guidelines
- We Work with Business Partners Who Share Our Values
- · We Gather Competitive Intelligence Properly



# **We Avoid Conflicts of Interest**

#### Our Commitment

We never let personal interests interfere with making good business decisions. We avoid all situations that could lead to even the appearance of a conflict of interest.



## Why It's Important

Conflicts of interest can harm our reputation. Making unbiased, ethical decisions helps our business and builds trust with our business partners and communities.

# How We Do the Right Thing

- Learn to recognize a conflict of interest which helps us avoid one.
- Remember that conflicts can happen what is important is to disclose conflicts so managers can help manage or resolve them.
- Proactively avoid situations that can lead to even the appearance of a conflict of interest.
- Follow the prescribed process to disclose and resolve a potential conflict.
- Contact the <u>Global Ethics and Compliance Team</u> with questions.



Conflicts of Interest Policy

Conflicts of Interest
Disclosure Form

Have a question?
Contact the
Global Ethics and
Compliance Team



#### What It Looks Like

It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts may arise. Examples include:

#### **Financial Interests**

 Holding a financial interest in a company that does business with or that could otherwise affect Jabil's business. This includes our own financial interests as well as those of our family members or close personal friends.

#### **Relatives and Friends**

- Dating or having a romantic or sexual relationship with someone to whom we report, either directly or indirectly.
- Making or influencing Jabil business decisions that benefit a family member or close personal friend.
- 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.
- Employing a family member of a customer or supplier.

#### **Outside Employment**

- Taking a job that may interfere with our job at Jabil or tempt us 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.
- Misusing Jabil assets or influences to promote or assist an outside

#### Doing the Right Thing - In Action

#### A colleague's son is applying for a job on our team. Is this allowed?

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.

#### My spouse owns a company that wants to be a Jabil supplier. Should I do anything?

Yes. This relationship could create a conflict of interest that needs to be reviewed by Jabil. Review the Conflicts of Interest Policy and disclose the potential conflict using the process described.

#### An employee of a supplier asked if he could recommend his daughter for a job at Jabil. What should I do?

The supplier's daughter can apply for a job at Jabil, but her relationship to the Company should be disclosed to management and HR during the hiring process.

# We Follow Our Gifts and Entertainment Guidelines

#### Our Commitment

We use good judgment, discretion and moderation when giving or accepting gifts or hospitality in a business setting. 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.



#### Why It's Important

Strong personal and professional relationships are important to our success. Gift giving and hospitality practices vary in different cultures. However, any gifts and hospitality given or received must be preapproved per the guidelines outlined in Jabil's policies and comply with applicable laws.

#### How We Do the Right Thing

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 gifts between supervisors and subordinates, except for token gestures or gifts of moderate value.
- 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.

#### 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
- If you have questions, contact the Global Ethics and Compliance Team.

#### Doing the Right Thing - In Action

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

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 guidance in our Global Anti-Bribery and Anti-Corruption Policy and Anti-Commercial Bribery Guidelines. 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.

During the holiday season I would like to give my customers and suppliers a gift. What is acceptable?

The gifts, entertainment & hospitality guidance in our Global Anti-Bribery and Anti-Corruption Policy and Anti- Commercial Bribery Guidelines provide reasonable and customary limits when giving 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.



# We Work with Business Partners Who Share Our Values

#### **Our Commitment**

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.

As RBA members, we adopt the RBA Code of Conduct which addresses labor, health and safety, environment, ethics, and management systems and commit to responsible business practices throughout the Jabil organization and our supply chain.

#### Why It's Important

Our business partners consist of customers, suppliers, 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 expect our suppliers to share our values and follow our Supplier Code of Conduct. The Supplier Code includes key expectations that suppliers must meet for ethical conduct related to labor and human rights, environmental issues, ethical responsibility and management systems.

#### How We Do the Right Thing

- 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.
- Safeguard any confidential information or personal data that a supplier provides to Jabil. Use Jabil-approved software and SaaS applications for sharing files and collaborating with external customers and resources.
- Make supplier-related decisions in the best interest of Jabil, not for any personal benefit or gain for you or a family member.
- Watch for signs that our business partners are violating applicable laws and regulations. These include bribery and corruption, environmental, employment, human rights and safety laws.
- · Make sure suppliers train their employees to follow the principles of our Supplier Code of Conduct.



Supplier Code of Conduct

Partner Life Cycle Policy

Conflict Mineral Policy

# We Gather Competitive Intelligence Properly

#### Our Commitment

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



#### Why It's Important

Strong competition drives innovation, which helps us perform at our highest potential. We follow competition laws because doing so ensures that we support our customers' needs with the best service possible in the marketplace.

- Never engage in fraud, misrepresentation or deception to obtain business information.
- Respect that new hires are obligated to not use or disclose the confidential information of their former employers.
- Immediately consult with your supervisor or the Legal Department if you have any questions about whether certain competitive activities comply with the Code.



**Transforming Tomorrow** with Integrity

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

#### In This Section:

- We Prevent Bribery and Corruption
- We Work with Governments Responsibly
- · We Comply with Global Trade Requirements
- We Compete Fairly
- We Respect Human Rights
- We Serve Our Communities
- We Conduct Political Activities Properly



## We Prevent Bribery and Corruption

#### Our Commitment

Always work with integrity. We never offer or accept a bribe from anyone, especially government officials – and remember, we're responsible not only for our actions, but also for the actions of anyone who represents Jabil. For us it's simple: offering or accepting a bribe from anyone, at any time, is always wrong.



#### Why It's Important

Bribery and corruption violate Jabil's values, our Code, and the laws of countries in which we operate. We protect our employees and our reputation by guarding against corruption and only working with business partners who share our commitment to integrity.

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.

- Do not give or accept bribes or kickbacks, offer facilitation payments or accept or offer any other kind of improper payment.
- Disclose and get preapproval (as outlined in our Global 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.
- Be aware that not reporting a bribe is a violation of this Code.
- 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." All services must be detailed and carefully documented in contracts, scopes of work, purchase orders and invoices.
- · Know that gifts to family members of a government official may be considered bribes.



#### What It Looks Like

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, or 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 they are already legally obligated to do.

#### Doing the Right Thing - In Action

- I work in a country that is considered high-risk for bribery and corruption. We are considering paying for a consultant who sometimes works with the local government to travel to the U.S. to attend a meeting. We would also provide tickets to a concert after the meeting. Is this allowed?
- 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 consultants retained by the local government. If this is the case, the proposed event tickets would not be approved since it is not business related.
- I was authorized to hire a consultant to help us get 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?
- 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. We must avoid any vagueness in potential government-facing services. All services must be detailed and carefully documented in the contracts, scopes of work, purchase orders and invoices. 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.
- A prospective supplier offered me \$1,000 to add 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 the supplier to the AVL for Jabil?

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 to obtain a business or commercial advantage. Contact the Global Ethics and Compliance Team or the Jabil Integrity Hotline so that this matter can be assessed.

#### The Global Impact of Bribery and

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 win business even though their products and services are inferior to ours. In addition, corruption is especially harmful in developing countries where 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, such as building license agencies; safety inspectors; fire departments; environmental, labor, electrical, water and sewer inspectors or international governmental organizations, you should be especially vigilant. Exercise caution and get required pre-approvals for government-facing vendors as they present heightened risk. Review our policies and contact the Global Ethics and Compliance Team with any questions.



# We Work with Governments Responsibly

#### Our Commitment

We must 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.

#### Cooperating with Government Inquiries

Notify the Legal Department whenever there is a non-routine government request for information or visits. 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.



#### Why It's Important

Special legal and contracting rules often apply to our dealings with governments to ensure that public funds are being used properly. These include bidding or procurement requirements, special billing and accounting rules, and restrictions on subcontractors or agents we may engage (also see <a href="We Follow Our Gifts">We Follow Our Gifts</a> and Entertainment Guidelines). We do the right thing by always following these procedures.

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

# We Comply with Global Trade Requirements

#### Our Commitment

We are committed to complying with global trade laws. Jabil is involved in international operations, logistics, finance and meeting planning. It is especially important to know and comply with the requirements associated with the countries in which we do business.

#### 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.



#### Why It's Important

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 protect the Company and make the world a safer place by following these regulations.

#### How We Do the Right Thing

- 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.
- Use the export classification of goods, software or technology to determine if they require government authorization for export.
- Direct questions or concerns about trade laws or known violations to the Legal Department.



Jabil International
Trade Policy

# **We Compete Fairly**

#### Our Commitment

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.



#### What It Looks Like

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 anticompetitive discussion, you should refuse to discuss the matter, leave the conversation immediately and report what happened to the Global Ethics and Compliance Team.

#### Why It's Important

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.
- Do not agree with a competitor to coordinate bidding to a customer.
- Consult with the <u>Global Ethics and Compliance Team</u> if you have any questions or concerns about violations of anti-competition laws.

## **We Respect Human Rights**

#### Our Commitment

We promote respect for human rights everywhere we work. We believe human rights are an essential element of responsible corporate citizenship.

#### Why It's Important

As responsible global citizens, we are always looking for ways to improve respect for human rights throughout our organization and supply chain. We respect the human, cultural and legal rights of individuals and communities by supporting the dignity and equality of all human beings.

In addition to support of the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights, we are also a full member of the Responsible Business Alliance (RBA).

#### How We Do the Right Thing

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 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.
- The workplace should be free of harassment and unlawful discrimination.

Each of us can 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.



Human Rights Policy

Child Labor Policy

RBA Commitment Policy

Apprenticeship, Vocational, and Educational Programs Procedure

### **We Serve Our Communities**

#### Our Commitment

At Jabil, we make the world a better place with the way we treat each other. We extend innovative solutions, give back to our local communities, and respect the environment. Jabil is proud to support charitable activities in our local communities. We encourage our employees and those who are working on our behalf to do the same. We believe that while our efforts are locally driven, the impact is global.

#### Charitable Organizations

Remember that charitable organizations do not include:

- Labor or trade unions.
- Civic or business associations.
- Any organizations that attempt to influence government legislation or support of its members.



#### Why It's Important

We pride ourselves in giving back to communities where we live and work. We do this by helping address specific challenges in the local communities and countries where we operate.

#### How We Do the Right Thing

- Use your <u>Community Service PTO time</u> to volunteer at a charity that is personally important to you.
- Support organizations that address issues impacting your local community.
- Support organizations that align with Jabil's vision of being a leading corporate citizen, and whose activities align to Jabil Cares focus areas of Education, Empowerment & Environment.
- If you volunteer with charitable organizations, be sure that your participation does not interfere with your work schedule.
- Never make any direct or indirect contribution on behalf of Jabil unless authorized. Any charitable donations made by Jabil should be approved by your executive vice president (EVP).
- Make sure charitable organizations comply with Jabil's nondiscrimination and conflict of interest policies.
- Select charitable organizations that will not directly or indirectly benefit any individual Jabil employee or their family member.
- Never give the impression that personal participation in a charity or event is endorsed or supported by Jabil unless approved in advance by your EVP.



& Anti-Corruption
Policy

Charitable Donations
Policy

Jabil Cares SharePoint

# We Conduct Political Activities Properly

#### **Our Commitment**

We believe in the right of employees to participate in the political process. However, we must not give the impression that our individual beliefs represent Jabil.



#### Why It's Important

If you are active in political activities, it should be on your own time and at your own expense. Separating personal activities and opinions from those of the Company helps protect Jabil.

Jabil may exercise its right and responsibility to make its position known on relevant issues. When doing so, we follow all lobbying laws. We 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.

#### How We Do the Right Thing

- Make it clear in all communications that your political views and actions are your own and not those of Jabil.
- Never use Company funds, assets or facilities to support any government related donations, unless approved by the Global Ethics and Compliance Team.
- Never pressure another employee, customer or business partner to contribute to, support or oppose any political candidate or party.
- Never make a political contribution with the intent to improperly influence someone.



Global Anti-Bribery & Anti-Corruption Policy

Charitable Donations
Policy

Political Engagement Policy

# Integrity. Trust. 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 independent investigation of compliance concerns.
- · Shares ethics and compliance trainings and communications.
- Assists with the design and use of preventative compliance measures.

In applying the Code, the Global Ethics and Compliance Team works closely with the rest of the Legal, Finance, Human Resources, Supply Chain and Procurement, and other groups focused on ensuring compliance.

#### Jabil's Compliance Office

The Global Ethics and Compliance Team is a part of Jabil's Compliance Office, which ensures our activities, operations, and practices adhere to all applicable laws, regulations, industry standards, and internal policies.

In addition to the Global Ethics and Compliance Team, the Compliance Office includes Corporate Environmental Health and Safety, Sustainability, Trade, Regulatory, Government Affairs, and Supply Chain Contracts/Procurement. The Compliance Office is led by the Chief Compliance Officer, who reports directly to the General Counsel and the Audit Committee.

# Our Global Ethics and Compliance Team

Thomas Cetta, SVP, Chief Compliance Officer thomas\_cetta@jabil.com

Peter Zanolin, Head of Global Compliance Peter\_Zanolin@Jabil.com

The Global Ethics and Compliance Team Global\_Compliance@jabil.com



#### Resources

Anti-Commercial Bribery Guidelines for Employees Interacting with Suppliers

Apprenticeship, Vocational, and Educational Programs Procedure

Charitable Donations Policy

Child Labor Policy

**Conflict Mineral Policy** 

Conflicts of Interest Disclosure
Form

Conflicts of Interest Policy

Data and Artificial Intelligence (AI)
Policy

Data Subject Right Request

End User Digital Information Handling Standard

Fair Regulation Disclosure Policy

Global Acceptable Use Policy

Global Anti-Bribery & Anti-Corruption Policy

Global Anti-Discrimination and Anti-Harassment Policy

Global Digital Information
Classification Policy

Global Ethics and Compliance Team

Global Human Rights Policy

Global Information Security Incident Management Policy

Global Travel and Entertainment Policy

Information Security Policy

**Insider Trading Policy** 

Jabil International Trade Policy

Jabil Sustainability Progress Report

Jabil Cares SharePoint

Jabil Records Management Program FAQ

Jabil Sustainability Policy Statement

Partner Life Cycle Policy

Political Engagement Policy

Privacy Policy

Records Management Policy

Related Party Transaction Policy

Responsible Business Alliance

Commitment Policy

Sexual Harassment Video

Social Media Policy

Software Asset Management Policy

Supplier Code of Conduct