



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

**Approved Date**



**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).**

**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 or 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 indicators that a corrupt payment or illegal activity may be at high 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**









**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, Jbil strictly prohibits any:**

**contributions made on behalf of Jbil to candidates for any political office as well as contributions to a charity associated with a politician, political party or candidate;**



**Jhil is required to make and keep books and records that accurately and fairly reflect payments, expenses, and disposition of assets. Jhil is also required to develop and maintain a system of internal accounting controls for payments, expenses and disposition of assets. Jhil Personnel must reference Jhil's**

