

The background of the header section features a blue-tinted photograph of several business professionals in a meeting. They are silhouetted against a bright window, and their shadows are cast onto a table in the foreground. A large, stylized blue 'X' graphic is overlaid on the left side of the image.

# SUPPLIER CODE OF CONDUCT

## Overview

Jabil is committed to ethical business conduct and the highest standards in social and environmental responsibility. Jabil expects its suppliers to share this commitment by complying with and training its employees on the principles and values in this Jabil Supplier Code of Conduct (“Code”). Jabil suppliers include all entities that provide goods or services to or on behalf of Jabil. This Code sets forth Jabil’s key expectations for suppliers regarding labor and human rights, environmental issues, ethical responsibility and management systems. Jabil expects its suppliers to comply with this Code and all applicable laws and regulations.

Jabil has adopted the Responsible Business Alliance (RBA, formerly Electronics Industry Citizenship Coalition RBA Code of Conduct) as our Supplier Code of conduct for Jabil and its suppliers. Jabil expects its suppliers to operate in accordance with Jabil’s Supplier Code and the RBA Code of Conduct, which include provisions covering responsible management in labor, health & safety, environment, and ethics. In addition to complying with the RBA Code of Conduct, this Code incorporates additional standards and expectations that are required of Jabil’s suppliers. The RBA Code of Conduct is located on the RBA website at [responsiblebusiness.org/code-of-conduct/](https://responsiblebusiness.org/code-of-conduct/) and is available in multiple languages.



## ■ RESPONSIBILITIES OF JABIL SUPPLIERS

### A. LABOR AND HUMAN RIGHTS

Jabil believes that all workers should be treated with dignity and fairness in an ethical manner in the workplace throughout the supply chain. Jabil suppliers are expected to uphold this commitment to human rights.

#### 1) Anti-Discrimination

Suppliers must not engage in discriminating against any worker based on race, religion, 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, in hiring and other employment practices. Suppliers shall not require medical tests including pregnancy tests, unless such tests are required by law or regulations for safety reasons.

#### 2) Anti-Harassment

Suppliers must treat all workers humanely and with respect and commit to a workplace free of harassment. Suppliers may not subject workers to corporal punishment, physical, sexual, psychological, or verbal harassment. Suppliers may not threaten workers with monetary fines as a means of discipline.

#### 3) Child Labor

Suppliers must not employ child labor in manufacturing. In the absence of local law, suppliers shall not employ workers under the age of 15 years of age. Further, workers under the age of 18 years of age shall not be required to perform work likely to jeopardize their health or safety, including night shifts and overtime.

#### 4) Forced Labor and Human Trafficking

Suppliers must not participate in any form of slave, forced, bonded, indentured, or prison labor. Suppliers must not participate in human trafficking, or any form of involuntary labor, including but not limited to the transportation, recruitment and employment of individuals by means of threat, fraud, abduction, or payments to any individual having control over another individual for the purpose of exploitation or abuse.

Suppliers must ensure that workers have access to their government-issued identification, work related and travel documents. Suppliers must not require workers to deposit money to access such documents. Workers must be allowed to resign their employment in accordance with local and national employment laws or regulations

#### 5) Third Party Employment Agencies

Suppliers must ensure that third-party recruitment agencies are compliant with the provisions of this Supplier Code of Conduct and legal requirements and be responsible for any payment for all recruitment-related fees and expenses. If such fees are found to have been paid by the workers, they must be repaid to the workers.

#### 6) Compensation, Benefits, and Working Hours

Suppliers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers must compensate workers for overtime work at pay rates greater than regular hourly rates. All workers must be provided written information about their employment conditions in a language that is understandable to them. Suppliers are not permitted to deduct wages as a disciplinary measure, nor will any deductions from wages not provided for by national or local law be permitted without expressed written permission of the worker concerned. All temporary and outsourced labor shall be within the limits of the local law.

A workweek should not be more than 60 hours per week, including overtime, except in emergencies or unusual situations. Workers must be allowed at least one day off every seven days. Suppliers must follow all applicable laws and regulations regarding working hours and days off. All overtime must be voluntary.

#### 7) Freedom of Association

Suppliers must respect the right of all workers to associate with others, form and join, (or refrain from joining), organizations of their own choosing, and bargain collectively, without fear of interference, discrimination, retaliation or harassment.



## **B. HEALTH AND SAFETY**

Suppliers are expected to provide workers with a safe and healthy work environment. Suppliers must take proactive measures to minimize the incidence of work-related injury and illness by integrating prudent health and safety management practices into their business.

### **1) Occupational Health and Safety**

Suppliers must identify, assess, and manage occupational health and safety hazards through proper design, engineering and administrative controls, preventative maintenance and safety training.

### **2) Environment, Environmental Permits and Reporting**

Suppliers must be committed to sustainability in their operations. Suppliers are expected to comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.

Suppliers must obtain, maintain, and keep current all required environmental permits and registrations, and follow the operational and reporting requirements of such permits

### **3) Working and Living Conditions**

Suppliers must provide workers with reasonably accessible clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a third-party must be maintained clean and safe, and provided with reasonable living space.

### **4) Health and Safety Communication**

Suppliers must provide workers with appropriate workplace health and safety information and training in their primary language. Health and safety related information must be clearly posted in the facility. Workers must be encouraged to raise safety concerns.





## C. ETHICS

Jabil expects its Suppliers to conduct all aspects of its business with integrity and in an ethical manner, including sourcing, relationships, and operations.

### 1) Responsible Sourcing of Materials

Suppliers must exercise due diligence on the materials in their supply chains, to include developing policies and procedures to identify applicable risks and to take appropriate steps as necessary to mitigate them. Suppliers are expected to supply conflict-free materials and products. Therefore, Suppliers must conduct due diligence to reasonably ensure that their products do not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses, or severe health and safety risks and negative environmental impacts.

### 2) Trade Compliance and Export Controls

Suppliers are expected to comply with all applicable trade laws, as well as, the applicable export, re-export, and import regulations associated with the countries in which they do business. Suppliers should not participate in international boycotts that are not sanctioned by the United States government or applicable laws.

Suppliers must not directly or indirectly provide any goods or services from a country, person or entity that is subject to U.S. and other regional, unilateral and multilateral regulations that restrict transaction with specific foreign entities, persons or countries (often referred to as denied, debarred, and/or restricted parties). Suppliers must implement due diligence compliance practices to screen Suppliers' employees, customers, suppliers, vendors, agents and other business associates, including all parties in each transaction such as banks, insurance companies, shipping lines, and freight forwarders to ensure compliance with applicable laws and regulations concerning embargoes and sanctions.

Suppliers who work with the U.S. Government must read and comply with the Jabil Defense and Aerospace Services Supplier Standards of Business Conduct. <https://www.jabil.com/solutions/by-industry/enterprise/defense-and-aerospace/supplier/standards-of-business-conduct.html>

### 3) Privacy

Suppliers are committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

### 4) Business Integrity

Suppliers must uphold the highest standards of integrity in all business interactions. They must not engage in bribery, corruption, extortion, or embezzlement to obtain an unfair or improper advantage. Suppliers must abide by all applicable anti-corruption laws and conventions. Further, Suppliers are also responsible for ensuring that any third party they engage agrees to abide by business integrity standards that are no less stringent than this Code.

### 5) Gifts and Gratuities

Suppliers should avoid giving or receiving gifts to and from Jabil employees because even well-intentioned gifts might be considered a bribe under certain circumstances or create conflicts of interest. Gifts and entertainment must not be offered in close proximity to a major business decision or in an attempt to gain special treatment. Cash is never acceptable. Any such gift must abide by Jabil's policies. See the [Jabil Code of Conduct](#).

### 6) Improper Payments

Bribes, kickbacks and similar payments are strictly forbidden. These payments are prohibited even when local laws may allow such activity.

### 7) Conflicts of Interest

Suppliers must avoid actual or even the appearance of conflicts of interest with Jabil. Suppliers must not conduct business directly with any Jabil employee whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the Supplier. In the course of negotiating the Supplier agreement or performing the Supplier's obligations to Jabil, dealing directly with a Supplier's spouse, domestic partner or other family member or relative employed by Jabil is also prohibited. Suppliers must use the Jabil [Conflicts of Interest Disclosure form](#) to disclose any potential conflicts of interest.



## C. ETHICS *CONTINUED*

### 8) Insider Trading

Suppliers must avoid the disclosure of any nonpublic information acquired about Jabil or another company's securities that could influence an investor's decision to buy or sell the security and should avoid insider trading by not buying or selling such securities when in possession of this information.

### 9) Business Records

Suppliers must accurately and honestly record and report all business information to appropriate parties regarding labor, health and safety, environmental practices and comply with all applicable laws regarding their completion and accuracy.

### 10) Protection of Intellectual Property

Suppliers shall respect intellectual property rights and safeguard information of Jabil and third parties.

## D. MANAGEMENT SYSTEMS

Suppliers must adopt or establish a system to manage the elements of this Code, and the law, identify and mitigate related operational risks, and facilitate continuous improvement. Supplier must identify company representatives responsible for ensuring implementation and periodic review of its management systems. Suppliers must maintain appropriate documents and records to ensure regulatory compliance.

## E. REPORTING CONCERNS

Suppliers must provide an anonymous complaint mechanism for your employees, agents, and subcontractors to report grievances. Suppliers must protect whistleblower confidentiality and prohibit retaliation.

Any Supplier who is aware of any potential wrongdoing, or if you suspect unethical or illegal behavior that you believe would violate this Code, you may contact the [Jabil Integrity Hotline](#).