

POLITICAL ACTIVITIES

Jabil respects that employees may participate in legitimate political activities outside of their jobs, such as volunteering or raising money for candidates and political parties of their choice. However, employees participating in certain political activities within the United States risk violating various federal and state election, ethics, and disclosure laws, thereby putting themselves and Jabil at risk for serious legal penalties.

While this Policy is intended to govern political activities conducted in the United States, political activities conducted in foreign countries may also implicate the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and any other Anti-Corruption laws in foreign countries. Please review Jabil's [Foreign Corrupt Practices Act, UK Bribery Act and Anti-Corruption Policy](#), which addresses certain politically related activities conducted in foreign countries and contact the Office of the General Counsel before engaging in political activities in foreign countries.

Because this area of the law is complex and the penalties can be serious, Jabil has adopted these “*Rules of the Road*” for political activity:

- **Never Reimburse or Offer to or Reimburse Another’s Political Contributions.** Jabil will not directly or indirectly reimburse any employee for making a political contribution.
- **No Coercion and No Rewards.** Do not coerce or reward another employee into making a political contribution or engaging in political activity.
- **Do Not Imply Company Endorsement in Your Personal Campaign Activities.** This means no use of Jabil stationery, business cards or other indicia suggesting Jabil sponsorship or support of such activities.
- **Leave the Campaigning at Home.** Do not use any Jabil facilities, personnel or other resources in connection with your political activity.
- **Never Give an Improper or Illegal Gift.** Do not give a gift with the intent to influence official action or to reward the official for his or her official actions.
- **No Improper Communication with a Government Official.** Never attempt to improperly influence a government official or official action.
- **No Free Meals with a Government Official.** Jabil will not reimburse any expenses on behalf of government officials unless a supervisor or the Office of the General Counsel has approved reimbursement in advance.
- **Abide by Applicable Laws.** Different geographic regions may have different election, ethical, and disclosure laws. Abide by the laws applicable to the geographic region in which you work.
- **When in Doubt, Ask.** You are responsible for ensuring that you comply with the applicable laws. If you are unsure whether your political activities may violate federal, state, or local laws, or the provisions of this Policy, contact the Office of the General Counsel.

These rules are described more fully in [Jabil’s Political Activities Policy](#).

JABIL CIRCUIT, INC.
POLITICAL ACTIVITIES POLICY

I. SCOPE

This policy governs various political activities conducted in the United States including: political contributions and campaigning; gift giving and entertaining; and communicating with or lobbying government officials. While this Policy is intended to govern political activities conducted in the United States, political activities conducted in foreign countries may also implicate the U.S. Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act (“Act”) and any other Anti-Corruption laws in foreign countries. Please review Jabil's [Foreign Corrupt Practices Act, UK Bribery Act and Anti-Corruption Policy](#) (“Anti-Corruption Policy”), which addresses certain politically related activities conducted in foreign countries, and contact the Office of the General Counsel before engaging in political activities in foreign countries.

This Policy also governs all Jabil employees, officers and directors (“Employees”) whose work-related or personal political activities affect Jabil as described below:

- **Political Activities as an Employee.** As an employee, your job duties may require you to interact with government officials at the federal, state and local levels. These political activities affect Jabil when they are done with Company resources or when it seems they are done on Jabil’s behalf (e.g., using Jabil’s name). Misuse of Company resources could lead to legal liability for you and Jabil.
- **Personal Political Activities.** Engaging in political activities outside your job may subject you and Jabil to liability if it appears from your actions that Jabil is involved. Examples of this may include: using Company facilities, personnel or resources (including the nominal use of Jabil copier, postage, or phone lines) for political activity. Therefore, it is critical that all employees exercise extreme caution when engaging in political activity, even on a personal basis.

II. POLITICAL CONTRIBUTIONS AND CAMPAIGNING

The laws governing political contributions and campaigning are varied and complex. While some narrow exceptions may apply, federal law generally prohibits Jabil as a corporation from making political contributions, directly or indirectly, in connection with federal elections. In addition, whether Jabil may make contributions to state and local campaigns varies from jurisdiction to jurisdiction. Therefore, in order to avoid violations of election laws, Jabil strictly prohibits any donations or contributions to candidates for any political office on behalf of Jabil. For personal donations or contributions, Jabil employees must abide by these rules:

- **Your Contributions Are Your Own.** Never offer to or reimburse another’s political contribution. Jabil will not directly or indirectly reimburse any employee for making a political contribution.
- **Leave Jabil Out of It.** Do not suggest that Jabil supports your political activities. Do not use your Company title, Company e-mail account, corporate stationery, or business cards in your political activities.
- **Leave the Campaigning at Home.** Do not engage in personal political activity during work hours. Do not use Jabil’s facilities, resources, or personnel in connection with your political activity. Even nominal use of Jabil’s copier, postage or phone lines for political activity could be considered a violation of this Policy.

- **No Coercion and No Rewards.** Do not coerce or reward another employee into making a political contribution or engaging in political activity.

III. POLITICALLY RELATED GIFTS AND ENTERTAINMENT

Jabil discourages gift giving to government officials; however, in some instances, it may be permissible to provide token gifts to foster valuable business relationships. Examples of appropriate gifts to government officials include flowers, food baskets or other inexpensive items that are permitted under local law for holidays or culturally accepted occasions. To ensure that politically related gifts are lawful, employees must abide by the following rules:

- **No Improper Gifts.** Employees are prohibited from giving or offering a gift to government officials in order to influence, gain or secure a business advantage. In addition, employees must consult Jabil's [Anti-Corruption Policy](#) which governs our relationships with all third parties, including government officials and private parties. All gifts for government officials require advanced authorization and must be recorded in Jabil's books and records in accordance with Jabil's [Global Travel and Entertainment Policy](#) and [Anti-Corruption Policy](#).
- **Travel and Entertainment.** Travel and entertainment expenses require the advanced authorization and must be appropriate, reasonable, directly related to a legitimate business purpose and properly recorded in Jabil's books and records consistent with Jabil's [Global Travel and Entertainment Policy](#) and [Anti-Corruption Policy](#).

IV. COMMUNICATING WITH GOVERNMENT OFFICIALS

There are circumstances when communicating with government officials might expose Jabil to lobbying and other political activity laws and regulations. These laws are complex and vary greatly from jurisdiction to jurisdiction. Therefore, in order to avoid violations of various lobbying and other political activities laws, Jabil employees must abide by these rules:

Recognize When Your Communications With Government Officials Could Put Jabil at Risk. For example, you must consider whether you are lobbying if: you meet with a government official about a government action that would benefit Jabil; you communicate with a government official about routine business activities such as government contracts or tax incentives; or you are communicating with a government official attempting to get a contract awarded. Consult with the Office of the General Counsel if you are unsure whether your communications would be considered lobbying.

- **Get Authorization From the General Counsel – First.** If you believe it is necessary to lobby a government official or hire a contractor or agent to lobby on Jabil's behalf, you must get written authorization from the Office of the General Counsel in advance.
- **No Improper Communication with a Government Official.** Your position with Jabil may put you in contact with government officials regarding government contracts or tax incentives. Never attempt to improperly influence a government official or official action.
- **Make Sure Approved Contractors or Agents Follow These Rules.** When it is anticipated or expected that approved contractors or agents will have contact with government officials, all Jabil professional services agreements must include certification language requiring the approved contractors or agents to: (1) abide by the [Anti-Corruption Policy](#); (2) comply with all laws and regulations governing lobbying and gifts to public officials; and (3) accurately and timely provide Jabil with copies of all lobbying registrations and reports that will enable Jabil to meet its registration and reporting requirements. Contractors and agents will never be reimbursed for expenditures for entertaining or giving gifts to government officials, or for any political contribution.

- **Keep Your Records.** Jabil may be required to tell the government about certain communications that could be considered lobbying. Therefore, you must keep the necessary records related to the communications, or as directed by the General Counsel.

V. SANCTIONS

A violation of this Policy may lead civil and/or criminal proceedings against the Company and individual involved. If Jabil determines that an employee has violated the law, or the provisions of this Policy, the employee may be subject to disciplinary action up to and including termination.

VI. WHEN IN DOUBT, ASK.

This area of the law is complex, and the legal requirements often differ from jurisdiction to jurisdiction, and between state, local, and federal laws. If you are unsure whether your political activities may violate any law, or the provisions of this Policy, please contact:

Jabil's Anti-Corruption Compliance Coordinator

Kevin W. Bond

727-803-3255

Kevin_Bond@Jabil.com or Compliance_Coordinator@Jabil.com

General Counsel, Robert L. Paver

727-803-3305

Bob_Paver@Jabil.com

VII. USE WITH OTHER JABIL POLICIES AND PROCEDURES

This Policy references other Jabil policies with which all Jabil employees are required to comply. Jabil policies are available on Jabil's intranet website, and they include.

- [Foreign Corrupt Practices Act, UK Bribery Act and Anti-Corruption Policy](#)
- [Global Travel and Entertainment Policy](#)

Last update August 2011