1. INTRODUCTION

We hold our suppliers, business partners and other stakeholder to the same standards that we hold ourselves. Running a good business means running a safe and ethical business that extends well beyond Jacobs.

Jacobs enjoys an excellent reputation in terms of the quality and innovation of our work, and in the way we keep honesty and integrity at the forefront of how we conduct business. Over the past six decades, we have earned our solid reputation through countless interactions with clients, suppliers, authorities and other stakeholders.

Every year we work on projects representing billions of our clients’ dollars, and to do this we must have their trust. We always hold ourselves – and our suppliers and subcontractors – to the highest ethical standards. Our Supplier Code of Conduct is designed to provide clarity about our expectations of those we partner with to meet the needs of our clients; including suppliers, vendors and subcontractors. This document is an overview of the guiding principles and values that govern how we conduct business and make ethical decisions.

Your Supply Chain: When you work with us, you must also ensure that your supply chain complies with this Code of Conduct.

Asking for Help and Reporting Concerns: If you become aware of any ethical issues that may affect Jacobs, or have any concerns or questions, you should contact your Jacobs’ Global Supply Management point of contact. If you prefer, you may call anonymously through the Jacobs Integrity Hotline: +1(844) 543-8351. If you do not speak or understand English well, we offer translation services or alternative, a list of country specific phone numbers can be found at https://jacobsconnect.jacobs.com/docs/DOC-258812, or write to:

Jacobs Integrity Hotline
C/O EthicsPoint
P.O. Box 230369
Portland, OR  97223

Jacobs will assess your compliance with this Code: Jacobs regularly conduct audits and thoroughly investigates possible non-compliance with this Code. We strive to be
prompt and fair in our investigations and conduct them confidentially to the extent possible under the circumstances. If you are involved in an audit or investigation, you must cooperate fully and comply with corrective measures if they are found to be needed. Any violations of this Code or failure to cooperate in an audit or investigation may jeopardize your business relationship with us, up to and including termination of any contracts you have with us.

Jacobs values strong, long-term relationships with clients and suppliers. We realize that our relationships are strengthened when fundamentals such as safety, integrity and business ethics are aligned. Thank you for doing your part and helping us continue to build and maintain our hard-earned reputation; today and in the future.

2. CODE OF CONDUCT

2.1 Safety and Environmental Considerations

The health and safety of our employees and everyone associated with our work is of utmost importance at Jacobs. We are committed to adhering to the highest standards of safety practices; but more than that, safety is an intrinsic part of how we do business – we are committed to a “culture of caring” where safety is engrained in everything we do.

Our culture of caring also extends to how we approach the environment and sustainability. It is important that our suppliers strive to balance the social, economic and environmental aspects of their businesses; just as we do for our business and for the businesses of our clients.

You must always:

• Comply with applicable health safety and environmental laws and regulations.
• Apply safe work practices to all activities and instill a safety culture in your work environments and processes.
• Focus on accident prevention and minimizing exposure to health risks.
• Develop and implement emergency response plans and procedures.
• Develop, implement, and maintain environmentally responsible business practices.
• Work to deliver sustainable, efficient and effective goods, services and solutions.

3. QUALITY

Jacobs is dedicated to delivering a superior client experience and value. We strive to delight our clients and exceed their expectations through high-quality and innovative solutions.

You must always:

• Have the same commitment to quality in the goods, services and solutions with which you supply us.
• Ensure all goods, services and solutions you supply to us are in compliance with applicable laws and regulations.
4. **OBSERVANCE OF COMPETITION AND ANTI-TRUST RULES**

Jacobs is committed to conducting its business in full compliance with anti-trust and fair competition laws.

You must always:

- Comply with applicable anti-trust and competition laws.
- Compete honestly and fairly.

You must never:

- Engage in anti-competitive business practices intended to limit or impair full and open competition for the goods, services and solutions provided to Jacobs.

5. **BRIBERY AND CORRUPTION**

Jacobs wins and executes projects honestly and ethically.

You must always:

- Understand and comply with the Foreign Corrupt Practices Act, the UK Bribery Act and applicable anti-corruption laws.
- Avoid any conduct that could reasonably be perceived by our customers or others as improper.
- Tell us about any attempt that is made to bribe you or solicit bribes from you while you are working with us.
- If you receive a request from a Jacobs employee or representative which you reasonably believe is or may be (or may be perceived to be), a solicitation for a bribe, kickback, or other corrupt payment, we expect you to refuse the request and to let us know.
- If you receive a request from a Jacobs employee or representative which you reasonably believe is or may be (or may be perceived to be) a request to make a bribe or other corrupt payment to a third party (i.e. a client, or government official) on our behalf, we expect you to refuse the request and to let us know.
- If you are offered or are aware of anyone else who is offered an inappropriate, or suspicious gift, award, hospitality or business courtesy, we expect you to let us know.

You must never:

- Solicit, or receiving anything of value from a client representative, Supplier representative, or anyone else which might be perceived as compromising (or actually compromises) your honest service to Jacobs or our clients.
- Offer or give anything of value to improperly obtain new business, retain existing business, or secure any improper advantage.
- Permit others to do such things.
- Make any type of facilitation payment, even if such payments are a common business practice or legal under local law.
- Furnish gifts, meals, hospitality, travel or other business courtesies to government
officials if this would be illegal or could reasonably be perceived as improper.
• Make payments to political parties, party officials or candidates for political office that are illegal or could reasonably be perceived as improper.
• Offer anything to a Jacobs’ employee or family member of a Jacobs’ employee that could be interpreted as an attempt to influence the employee or put him or her under an obligation.
• Give a gift to a Jacobs’ employee, except an advertising or promotional item of nominal value.

6. INCLUSION AND DIVERSITY
Jacobs believes that an inclusive environment enhances innovation and motivates the people that drive our company’s growth.

We work to attract and retain diverse suppliers – large and small – in our markets around the world.

You must always:
• Provide fair and equal treatment to all in hiring, promotion, training, compensation, termination and disciplinary action.

You must never:
• Discriminate on the basis of age, culture, disability, education, gender, marital status, regional or national origin, sexual orientation, political affiliation, physical appearance, race, religion or any characteristic protected by law.

7. HUMAN RIGHTS
Jacobs respects and protects the rights of those who work for and with us; and for the people in the communities where we do business.

You must always:
• Treat all your workers with dignity and respect.
• Support and respect human rights and avoid any involvement in human rights abuses.
• Conduct all operations in a socially responsible, harassment-free and non-discriminatory manner.
• Comply with applicable laws concerning equal opportunities, child labor, forced labor, human trafficking, working hours, freedom of association, and fair wages.
• Ensure that the confidentiality of supplier and employee whistleblowers is maintained and that they are protected against retaliation.

8. INTEGRITY OF FINANCIAL AND PERFORMANCE RECORDS
Jacobs relies on accurate information and reliable records to make responsible business decisions.
You must always:

- Comply with good practice, relevant standards and laws pertaining to record keeping and record retention.
- Engage in honest and accurate recording and reporting of information.
- Keep accurate and complete records as required by Jacobs.

You must never:

- Make false, overstated, artificial or misleading entries or omissions in any system, book or record for any reason.

9. TRADE AND EXPORT CONTROL
Jacobs complies with all international trade laws and regulations that apply to us wherever we conduct business.

You must always:

- Understand and comply with applicable laws and regulations relating to export, trade, non-proliferation and arms control.
- Understand and comply with any applicable trade sanctions.
- Ensure that products supplied to Jacobs or our clients do not contain metals derived from “conflict minerals” that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or any adjoining country.

You must never:

- Participate in boycotts or other restrictive trade practices prohibited or penalized under United States or applicable local law.

10. MONEY LAUNDERING PREVENTION
Jacobs is committed to complying with applicable anti-money laundering and anti-terrorism laws. Jacobs only conducts business with reputable customers and suppliers involved in legitimate business activities with funds derived from legitimate sources.

11. CONFIDENTIALITY AND INTELLECTUAL PROPERTY
Jacobs deals with various types of proprietary, confidential and private information belonging to Jacobs, our clients, suppliers, employees and others. Jacobs’ access and use is restricted for only its intended purpose.

Our suppliers are required to:

- Protect Jacobs’ and our clients’ proprietary information; protect its confidentiality and use such information only as it is authorized and intended.
- Employ adequate internal controls in work processes and security measures for all computer systems, portable electronic devices, laptops and other storage devices to ensure the safety of information that Jacobs and our clients entrust you with.
12. MEDIA

As a publicly held multi-national company, we handle media and official social media interaction at the corporate level. All requests for media interaction undergo a corporate review and approval process.

You must always:

• Ensure any broad communication about our Company, our customers, or our work together, including but not limited to: Marketing materials, press releases, social media posts or media interviews, are formally approved prior to publication or broadcast by Jacobs’ Vice President of Corporate Communications.