

<b>Business Management System Policy</b>		Document No: JJ-CE-PL-9010-JJ	Page: 1 of 3
<b>Whistleblower Protection</b>		Effective Date: 05-SEP-2025	Rev. No: 1
Issuing Process: Ethics and Compliance	Process Owner: Global Ethics and Compliance Process Owner		

## 1.0 PURPOSE:

To promote Jacobs' commitment to ethical behavior and encourage the identification and reporting of concerns involving potential improper, unethical or illegal conduct and to protect personnel who report those concerns or otherwise participate in an investigation.

## 2.0 SCOPE OF APPLICATION:

- Processes:
  - 2..1 Primary interacting core and/or key support processes: Business Development (BD)/Sales; Project Management; Engineering and Technical Services (E&TS); Procurement; Global Field Services (GFS); Project Controls; Human Resources (HR); Health, Safety, and Environment (HSE); Accounting; Finance and Strategy; Quality; Information Technology (IT); Global Security and Resilience (GS&R); Legal; Ethics and Compliance; Risk; Sustainability; Records and Information Management (RIM); Internal Audit.
  - 2..2 Sub-processes:
    - a. None.
- Individuals/Organizations:
  - 2..1 Internal: Jacobs and all its enterprise functions, Business Units (BU), operating units subsidiaries, operations, and departments.
  - 2..2 External: Jacobs majority owned or controlled Joint Ventures.
- Exclusions:
  - 2..1 Internal: None.
  - 2..2 External: None.

## 3.0 REFERENCES:

- JJ-CE-PL-9000-JJ-H-01, Code of Conduct

## 4.0 DEFINITIONS:

- None.

## 5.0 INTRODUCTION:

Jacobs' continued success depends on all employees conducting business professionally, ethically and in compliance with the law. To achieve our vision and mission and maintain our values, we hold ourselves accountable to the highest standard of corporate citizenship and ethical behavior.

The Code of Conduct sets out the standards of behavior expected of all of us in all countries in which Jacobs operates. Jacobs has an open-door policy for all employees to encourage open communication and discussion. When in doubt, employees are expected to proactively seek interpretations or advice on the best course of action regarding conducting business professionally, ethically and in compliance with the law. If you become aware of or are concerned about departures from, or an attempt to depart from, the Code of Conduct, or other improper, unethical or potentially illegal conduct, confidential reporting mechanisms are available to report any behavior which you believe fails to meet Jacobs' standards.

## 6.0 POLICY:

- **Principle:** We shall conduct business with integrity and ethics worldwide in accordance with our Code of Conduct. We encourage all personnel or any other person who, reasonably and in good faith, have concerns that improper, unethical or illegal conduct has occurred, is occurring, or is about to occur by Jacobs, a Jacobs employee, a Jacobs client, or a Jacobs contractor / subcontractor or business partner, to immediately report those concerns. Employees should report concerns to a manager (not alleged to be involved in the suspected improper, unethical or illegal conduct), the Human Resources Department, the Legal Department and/or the Legal Ethics and Compliance Department. Any person, whether or not a Jacobs employee, may also contact the Integrity Hotline at [integrity.jacobs.com](mailto:integrity.jacobs.com) or at the telephone number +1 (844) 543-8351, and/or [askaquestion@jacobs.com](mailto:askaquestion@jacobs.com). Alternatively, reports may also be reported to the Board of Directors/Lead Independent Director ([leadindependent.director@jacobs.com](mailto:leadindependent.director@jacobs.com)) or the Audit Committee ([audit.committee@jacobs.com](mailto:audit.committee@jacobs.com)). In short, there are many ways to report suspected misconduct and there is no reporting hierarchy that must be followed.
- **Protection for Whistleblowers:** We prohibit any form of retaliation against any person who reasonably and in good faith reports any actual or suspected improper, unethical or illegal conduct or participates in an investigation. Any person retaliating against a whistleblower will be subject to discipline, up to and including termination.

***Note:** Any employee making a deliberately false and/or knowingly false report will be subject to discipline, up to and including termination. A person making a report is not automatically protected from the consequences of being a party to any improper, unethical or illegal conduct they report under this Policy.*

- **Types of Reports:** Examples of improper or unethical behavior, whether actual or suspect, that can be reported, in good faith, include, but are not limited to the following:
  - Violations of federal, country, province, state or local laws
  - Bribery, corruption or fraud
  - Accounting/financial or other reporting improprieties
  - Financial misconduct
  - Misuse of government or company funds
  - Improper billing
  - Improper time / labor reporting
  - Theft (property)
  - Harassment, discrimination or bullying
  - Health, safety, security and environmental incidents
  - Expense report violations
  - Misuse of a company credit card
  - Misuse of petty cash
  - Personal or organizational conflicts of interest
  - Falsification of documents or data
  - Anticompetitive conduct / antitrust violations
  - Unethical conduct
  - Data privacy breaches
  - Workplace violence (and threats of)
  - Other breaches of the Jacobs Code of Conduct
- **Where to Report Suspected Retaliation:** Any employee who is concerned that they have been retaliated against for having raised concerns of improper, unethical or illegal conduct should report that concern to a manager (not alleged to be involved in the retaliation), the Human Resources Department, the Legal Department and/or the Legal Ethics and Compliance Department. Any person concerned that they have been retaliated against may also contact the Integrity Hotline at [integrity.jacobs.com](mailto:integrity.jacobs.com) or at telephone number +1 (844) 543-8351, and/or [askaquestion@jacobs.com](mailto:askaquestion@jacobs.com). Alternatively, reports related to concerns about retaliation in violation of this Policy may be reported to

the Board of Directors/Lead Independent Director (leadindependent.director@jacobs.com) or the Audit Committee (audit.committee@jacobs.com).

- **Confidentiality and Nondisclosure:** To the extent possible, we are committed to preserving the confidentiality and privacy of the person making the report, the nature of the report, and any investigation regarding the report. In some instances, disclosure may be required by law, or by the need to prevent a threat to life, health, safety or property, or attendant to an investigation. The person making a report must maintain confidentiality of any information they report as well as what might be provided to them by Jacobs in relation to the report and any investigation. However, nothing in this Policy prohibits a person from reporting possible violations of federal, state or local law or regulation to any federal, state or local governmental agency or entity, including but not limited to the United States Department of Justice, the Securities and Exchange Commission, Congress, and any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of any law or regulation.

## 7.0 DESCRIPTION OF REVISIONS:

Rev #	Date	Reason for Changes
0	13-JUL-21	Initial release.
1	05-SEP-2025	Periodic review, administrative updates and conforming of language; adding table of exemplar unethical or improper conduct that can be reported. Aligned to new company structure and BMS template