

Business Management System Policy		Document No: PL-CE-PL-9010-PL	Page: 1 of 5
Whistleblower Protection		Effective Date: 05-SEP-2025	Rev. No: 1
Issuing Process: Ethics & Compliance	Process Owner: Global Ethics & Compliance Process Owner		

1.0 PURPOSE:

To provide the Company Policy for the whistleblower protections specific to Poland as required by applicable European Union (EU) and Polish laws, and to thereby promote 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:

2.1 Processes:

2.1.1 Other BMS processes that interact with, are impacted by, or interrelate with this Policy:

- a. Accounting;
- b. Business Development (BD)/Sales;
- c. Engineering and Technical Services (E&TS);
- d. Finance;
- e. Global Field Services (GFS);
- f. Global Security and Resilience (GS&R);
- g. Health, Safety, and Environment (HSE);
- h. Human Resources;
- i. Information Technology (IT);
- j. Internal Audit;
- k. Ethics and Compliance;
- l. Mergers and Acquisitions.
- m. Procurement;
- n. Project Controls;
- o. Project Management;
- p. Quality;
- q. Records and Information Management (RIM);
- r. Risk;
- s. Sustainability;

2.1.2 Sub-Processes: None.

2.2 Individuals/Organizations:

2.2.1 Internal: This policy shall apply to the following individuals who perform work for or who have a legal relationship with Jacobs (as defined below):

2.2.1.1 Employees;

2.2.1.2 Temporary employees;

2.2.1.3 Proxy, shareholders or partners;

2.2.1.4 Interns;

2.2.1.5 Volunteers;

2.2.1.6 Trainees.

The Policy shall also apply in the event of a report or public disclosure of information concerning a breach of law obtained in a work-related context prior to the establishment of an employment relationship or any other legal relationship constituting the basis for performing work or holding a function at Jacobs.

2.2.2 External:

2.2.2.1 Individuals performing work for Jacobs on a basis other than an employment relationship, including under a civil law contract,

2.2.2.2 Entrepreneurs collaborating with Jacobs,

2.2.2.3 Individuals performing work under the supervision and direction of a contractor, subcontractor, or supplier of Jacobs,

2.2.2.4 Jacobs majority owned or controlled Joint Ventures.

The Policy shall also apply in the event of a report or public disclosure of information concerning a breach of law obtained in the context of establishing a legal relationship constituting the basis for the provision of services or the performance of a function for Jacobs.

2.3 Exclusions:

2.3.1 Information covered:

2.3.1.1 By regulations on the protection of classified information and other information that is not subject to disclosure under generally applicable law for reasons of public security;

2.3.1.2 By professional secrecy of medical and legal professions; or

2.3.1.3 By criminal proceedings - in terms of the secrecy of preparatory proceedings and the secrecy of court hearings conducted in camera.

2.3.2 The Policy also does not apply in situations referred to in Article 5(2) and (3) of the Act of June 14, 2024, on the protection of whistleblowers (Journal of Laws 2024, item 928).

3.0 REFERENCES:

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

3.2 JJ-QL-PR-0050-JJ, Deviations.

4.0 DEFINITIONS:

4.1 Jacobs: Jacobs Polish subsidiaries (collectively, "Jacobs" or "the Company").

4.2 Policy (capitalized): Used within a given Jacobs policy document (e.g., "this Policy") refers to that specific policy document.

5.0 INTRODUCTION:

5.1 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 behaviour.

5.2 The Jacobs' JJ-CE-PL-9000-JJ-H-01, Code of Conduct sets out the standards of behaviour 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. Employees are expected to proactively seek interpretations or advice on the best course of action when in doubt regarding conducting business professionally, ethically, and in compliance with the law. If an employee becomes aware or is concerned about departures from, or an attempt to depart from,

the Code of Conduct or other improper, unethical, or potentially illegal conduct, confidential forums are available to report any behaviour that fails to meet Jacobs' standards.

6.0 POLICY:

6.1 General.

- 6.1.1 Any requests for exceptions or deviations to this Policy must be submitted to the process owner as per procedure JJ-QL-PR-0050-JJ, *Deviations*.
- 6.1.2 This Policy does not change the terms and conditions of an employee's employment relationship with Jacobs, including where applicable the "at-will" nature of such relationship. The Company may amend this Policy at any time in its sole and absolute discretion, and without prior notice.

6.2 Principle.

Jacobs shall conduct business with integrity and ethics worldwide in accordance with our JJ-CE-PL-9000-JJ-H-01, Code of Conduct. The Company encourages anyone who, reasonably and in good faith, has concerns that improper, unethical, or illegal conduct has occurred, is occurring, or is about to occur, to immediately report those concerns. (See 6.4 Where to Report.)

6.3 Protection for Whistleblowers.

- 6.3.1 The Company prohibits any form of retaliation against any person who, reasonably and in good faith, reports any improper, unethical, or illegal conduct; participates in an investigation; or facilitates the making of a report.
- 6.3.2 Any person retaliating against a whistleblower, investigation participant, or facilitator will be subject to discipline, up to and including termination.
- 6.3.3 Any person making a deliberately false report will be subject to discipline, up to and including termination.
- 6.3.4 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.
- 6.3.5 Any person who is concerned that they have been retaliated against should report that concern. (See 6.4 Where to Report.)

6.4 Where to Report.

Concerns should be reported to:

- a. A manager or line management at any level unaffected by the violation;
- b. The Human Resource Department;
- c. The Human Resources Employee Relations group;
- d. The Legal Department;
- e. The Legal Ethics and Compliance Department; and/or
- f. The Jacobs Integrity Hotline:
 - o Call: +1 844.543.8351 (available toll-free 24 hours a day, 7 days a week).
 - o Email: askaquestion@jacobs.com.
 - o Submit a report online <https://secure.ethicspoint.com>.
 - o Mail inquiries to:
Jacobs Integrity Hotline
C/O EthicsPoint
P.O. Box 230369
Portland, Oregon 97223
United States of America

6.5 Confidentiality and Nondisclosure.

- 6.5.1 To the extent possible, the Company is committed to preserving the confidentiality and privacy of the identity 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.

- 6.5.2 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.
 - 6.5.3 However, nothing in this Policy prohibits a person from reporting possible violations of federal law or regulation to any governmental agency or entity, including but not limited to national whistleblowing regulators, institutions of the European Union, the United States Department of Justice, the United States Securities and Exchange Commission, the United States Congress, and any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of any law or regulation.
- 6.6 Local Reporting of Suspected Legal Breaches.

If a concern relates to certain suspected legal breaches, it may be reported at a local level rather than via the methods listed at 6.4 Where to Report. Reporting at a local level is not obligatory, and reports may be made via corporate level reporting channels, if preferred, listed at 6.4 Where to Report. Unless agreed otherwise, local reports will be handled in Poland and the reporter's identity will not be shared with corporate level companies or departments.

6.6.1 Subject Matter of Reports.

Local reporting is only permitted where the concern relates to:

- 6.6.1.1 Corruption,
- 6.6.1.2 Public procurement,
- 6.6.1.3 Services, products, and financial markets,
- 6.6.1.4 Anti-money laundering and counter-terrorism financing,
- 6.6.1.5 Product safety and compliance with requirements,
- 6.6.1.6 Transport safety,
- 6.6.1.7 Environmental protection,
- 6.6.1.8 Radiological protection and nuclear safety,
- 6.6.1.9 Food and feed safety,
- 6.6.1.10 Animal health and welfare,
- 6.6.1.11 Public health,
- 6.6.1.12 Consumer protection,
- 6.6.1.13 Privacy and personal data protection,
- 6.6.1.14 Network and information systems security,
- 6.6.1.15 Financial interests of the State Treasury of the Republic of Poland, local government units, and the European Union,
- 6.6.1.16 The internal market of the European Union, including public law principles of competition and state aid, and corporate taxation,
- 6.6.1.17 Constitutional freedoms and human and citizen rights - occurring in relations between individuals and public authorities and not related to the areas indicated in points 6.6.1.1 to 6.6.1.16.

6.6.2 Where to Report.

- 6.6.2.1 Concerns of the type set out in 6.6.1 Subject Matter of Reports should be reported via Global People Services or at telephone number +48 12 225 63 47.

6.6.2.2 Reports by external parties may also be made by email to reportaconcernpoland@jacobs.com.

6.6.2.3 Reports may be made anonymously; however, this may impede our ability to investigate the concern.

6.6.2.4 Reports may also be made externally to a public authority designated to receive whistleblowing complaints of the type set out in 6.6.1 Subject Matter of Reports, for example, the Ombudsman or President of the Office of Competition and Consumer Protection. External reports may be made at any time but particularly where no action has been taken by Jacobs within the deadlines set out at 6.6.3 How Reports will be Handled; the reporter has reasonable grounds to believe that the alleged breach of law constitutes an imminent threat to the public interest; the reporter fears they will be exposed to retaliation; or there is the potential for collusion or concealment or destruction of evidence.

6.6.3 How Reports will be Handled.

6.6.3.1 Reports made at the local level under 6.6 Local Reporting of Suspected Legal Breaches will be received by a designated member of the Human Resources team, who will acknowledge the report within seven (7) calendar days, confirm its receipt to the reporting person, unless the reporting person does not provide a contact address, and determine next steps including carrying out an investigation, if necessary. Reports made via 6.6 Local Reporting of Suspected Legal Breaches will be handled locally and will not be investigated at the corporate level.

6.6.3.2 If an individual wishes for a matter to be reported at the corporate level, the individual should use the reporting mechanisms as outlined at 6.4 Where to Report.

6.6.3.3 For reports made under 6.6 Local Reporting of Suspected Legal Breaches, feedback will be provided within three (3) months of acknowledgement of the report. Feedback will detail whether there potentially may have been a breach of the law, as alleged, and any measures that have/will be taken.

6.6.3.4 The reporter's identity and the identities of any third parties will be kept confidential, except where consent is given. An anonymised register of concerns will be kept, and any personal data will be retained for no longer than five (5) years.

6.7 Responsibilities.

Responsibility for compliance with this Policy rests with every Company director, officer, manager, and employee.

7.0 DESCRIPTION OF REVISIONS:

Rev #	Date	Reason for Changes
0	3-MAR-2022	Initial release.
1	05-SEP-2025	Revisions to conform to applicable statutory provisions. Aligned to new company structure and BMS template