GET ANSWERS.
Ask before you act.
Use this document to understand company policies and your responsibilities.

All copies are considered to be uncontrolled.
For more than 70 years, Jacobs has been guided by a deep commitment to safety, ethics and integrity, with people at the heart of our business. Jacobs’ Code of Conduct is rooted in these values and provides a framework for how we should interact with our peers, customers, partners, suppliers and communities.

As we work together to tackle some of the world’s most complex challenges, there may be times when we are faced with an ethical dilemma. When we understand our Code of Conduct and commit to these standards, we are better equipped to successfully navigate issues and prevent harm to our business.

It is imperative that we make the right call and conduct our business with the integrity that reflects our heritage and ethical reputation.

If you have a question on the best course of action in a difficult circumstance – or if you become aware of a possible violation of a Jacobs policy or law that governs our business – please reach out to your supervisor, the Human Resources department, the Legal Department, the Ethics & Compliance department, or the Jacobs Integrity Hotline.

The Code of Conduct is a living document that will continue to grow and evolve alongside our company and our ever-changing global market.

I am proud to lead a company that is dedicated to creating a more connected, sustainable world, and I am inspired by the depth of talent and character exhibited by our diverse employee family. Thank you for helping reinforce our culture of caring and for your commitment to doing the right thing each day.

Respectfully

Steven J Demetriou
Chairman & CEO
July 2018
The Code of Conduct provides an introduction to the policies of the Company as well as a framework for ethical decision making. We do not intend it to be the last word on complex regulations; rather, it is a big-picture overview of company values and employee responsibilities.

It is also a living document. We plan to review and update the code as needed. Just as we strive to continually improve our performance, we are continually improving our Code of Conduct.

We have a reputation as an ethical company — one earned over decades of consistent behavior. But sometimes in the pursuit of business objectives, you may encounter issues and situations in which you don’t know what to do.

Our Code of Conduct can help. Many sections contain links to policies and procedures that provide additional subject matter detail. These can also be accessed at JacobsConnect>Business Practices System. Be sure you understand the rules; and, if ever in doubt, ask before you act.

We want you to make the right decisions.
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Learn more at: https://integrity.jacobs.com. This website can be accessed anywhere in the world confidentially and anonymously. GPS01-103, Rev. 11, Effective July 25, 2018
While our international presence is far reaching, we pride ourselves on being one company around the globe. We sustain our culture by remaining true to our Vision, Mission and Values. These guiding principles address how we interact with clients, suppliers, and each other. They shape our global business strategy, define our overarching goals, and serve as a constant reminder of Jacobs’ high performing, innovative and empowered culture. Our Vision, Mission and Values are a cornerstone of our culture and are foundational to our *Code of Conduct*. 

**VISION**

Providing solutions for a more connected, sustainable world.

**MISSION**

To be the world’s premier design, engineering, construction and technical services firm delivering end-to-end, innovative solutions that provide superior value to our clients.

**VALUES**

Our values stand on a foundation of SAFETY, INTEGRITY, INCLUSION and DIVERSITY.

PEOPLE are the heart of our business.

CLIENTS are our valued partners.

PERFORMANCE excellence is our commitment.

Profitable GROWTH is an imperative.
OVERVIEW

What is the purpose of the Code of Conduct?
Jacobs is accountable to many different stakeholders, from our shareholders and Board of Directors, to our clients and business associates, to our employees and their families, and not least to the communities where we work and live. This Code provides a consistent, company-wide statement of our business practices and workplace conduct, and thereby establishes the expectations, obligations, and responsibilities of our employees to abide by these business practices in all situations and circumstances, regardless of local culture or business climate, and regardless of the competitive environment in which we may find ourselves. Our Code is the foundation of the Jacobs’ Ethics and Compliance program, is one of many tools we use to advance our Vision, Mission and Values, and helps promote our strategy as we seek to grow our business and bring value both financially and ethically to our stakeholders.

Because the Code itself cannot address the range of ethical challenges we face, we offer more detailed guidance and policy statements. A list of more detailed policy documents is attached.

Who must obey the Code of Conduct?
This Code applies to every employee, director, and officer of the Company, anywhere in the world. This also includes majority-owned subsidiaries and subsidiaries over which Jacobs has managerial control. Particular aspects of the Code may also apply to agents, consultants, business partners, suppliers, and subcontractors.

What is my responsibility as an employee?
You are responsible for several things. First, you must read this Code and familiarize yourself with its contents. Second, you must participate in the annual acknowledgement and self-certification process confirming that you’ve read and understood the latest version of the Code, and agreeing to complete any other training required for your position. Third, you must follow the Code in your daily work. Finally, you must agree to seek advice from your manager, the Ethics & Compliance department, the Human Resources department, or the Legal department if you are confronted with a legal or ethical challenge.

THIS CODE OF CONDUCT DOES NOT COVER EVERY SITUATION THROUGHOUT THE WORLD THAT EMPLOYEES MAY ENCOUNTER. IT IS A GUIDE THAT PRESCRIBES CERTAIN BEHAVIOR AND THE APPLICATION OF GOOD JUDGMENT, TO AID YOU IN REACHING THE RIGHT DECISIONS.
What is my responsibility as a supervisor?
If you are a manager or supervisor, you are responsible for ensuring that employees who report to you understand and follow the Code and applicable policies and procedures. You should be a positive role model and create a work environment that is respectful, inclusive, and encourages employees to speak up with any concerns. Employee concerns should be taken seriously and elevated to the Human Resources department, Legal department or Ethics & Compliance department as appropriate.

What do I do if I have a concern or need to report a violation of the Code?
You have a duty to promptly report suspected or actual violations with full disclosure. Reporting may be anonymous if necessary, and confidential to the extent permitted. When a complaint is made, the Company conducts a timely and thorough investigation. We promote openness and encourage you to come to us directly with any complaints or problems so they may be addressed. We take all reports and complaints seriously.

Where do I go to report violations?
Employees have many ways to seek guidance or report suspected violations of the Code. You can contact your manager, Jacobs senior managers, the Human Resources department, the Legal department, the Ethics & Compliance department directly at compliance@jacobs.com, the Hotline at https://integrity.jacobs.com, telephone number (1.844.543.8351), or at askaquestion@jacobs.com. Finally, the Board of Directors/Lead Director are also available as a resource. Jacobs has an open door policy and encourages employees to raise concerns in the way they are most comfortable doing so.

It is important that employees not conduct their own investigations. Investigations often involve complex legal issues and acting on your own may compromise the company’s ability to conduct an appropriate investigation.

The point is: You must speak up if you see something that you think isn’t right.

Will I get into trouble for reporting a violation?
No. Jacobs strictly forbids any form of retaliation against an employee who makes a report in good faith out of genuine concern.

What are the consequences if I violate the Code of Conduct?
Violations are taken seriously, and consequences depend upon the situation. All violations are investigated so we understand the circumstances before acting. We have the right to take disciplinary action, including termination, for acts of misconduct. The appropriate disciplinary action is determined based upon the severity of the violation and the actual or potential impact on the Company and in accordance with applicable law. Some violations may involve civil and criminal liability, and violators may be subjected to incarceration or fines if prosecuted by law enforcement authorities.
INTEGRITY

Know the rules and your responsibilities. If unsure, ask before you act.

Does Jacobs provide training and awareness opportunities regarding the Code?
Certain individuals in the organization must complete appropriate training to ensure they understand and can apply the Code of Conduct and relevant policies and procedures to their work. If your position requires additional training, your manager will let you know.

How does the Code of Conduct fit into the Ethics and Compliance Program?
Jacobs has implemented a comprehensive program to maintain our commitment to integrity by ensuring compliance with both Company policies and the laws and regulations applicable to our business. The Code of Conduct is part of this overall program. It is intended to communicate the importance of ethical behavior to our business, and to provide guidance on requirements and compliance.

The Board of Directors adopted the Code as a fundamental part of Jacobs’ Ethics & Compliance program. The SVP & Chief Administrative Officer, in coordination with the SVP & General Counsel, oversees the Ethics & Compliance program. The VP for Ethics & Compliance is responsible for the management of the Ethics & Compliance department, and in coordination with other functional departments, implementation of the Code. The Ethics & Compliance department are local resources that employees can turn to for guidance on the Code.

See our Ethics & Compliance program on JacobsConnect for more information: Company>Ethics & Integrity.
OVERVIEW

ALWAYS FOLLOW THE LAW

OUR GENERAL POLICY REGARDING COMPLIANCE WITH LAWS

In conducting the business of the Company, employees, agents, officers and directors must follow the Code of Conduct. It is the policy of the Company that we observe and comply with all laws that apply to us – worldwide. In some cases, our values and ethics require us to do more than the law requires. In all cases we act with integrity in our business transactions and relationships.

Jacobs is a global company headquartered in the United States. Depending on where you live and work, there may be circumstances where you perceive a conflict between this Code and the laws or customs of your country. When we conduct business outside the U.S., we refer to U.S., UK, EU, and international conventions as a guide to our conduct, but we must also follow other countries’ laws. To apply one legal system against another is never a satisfactory approach, and there will be times that rules must be harmonized. Please consult with the Legal department or Ethics & Compliance department if you discover a conflict, so an appropriate solution can be determined.
YOU IN THE WORKPLACE: SAFETY & COURTESY

BeyondZero® COMMITMENT

We believe employee health and safety is a top priority.

You are responsible for extending Jacobs’ culture of caring to everyone in the workplace and beyond.

Employee health and safety is the number one priority at Jacobs. We strive to achieve BeyondZero by preventing even one accident from occurring and promoting positive mental health and physical well-being for all. We are committed to not only complying with industry safety regulations, but we have ingrained safety in how we do business—we believe in a “culture of caring” where safety is rooted in everything we do. People are the heart of our business, and we work diligently to promote your overall well-being.

In turn, our teammates are responsible for promoting safety and extending our culture of caring. That means following health and safety rules; maintaining the safety of the workplace; promoting safe work practices with our clients, projects, and contractors; reporting incidents and violations (even minor injuries and “near misses”); and having concern and empathy for the well-being of yourself, your family and your colleagues.

For BeyondZero to thrive, it requires effort and commitment from everyone at Jacobs. You can help us achieve a healthy, safe, productive and positive work environment if you have the courage to care, to intervene, and to challenge yourself and your colleagues to pursue safe practices. If each of us is committed, we believe we can eliminate workplace accidents altogether and promote better well-being in all aspects of our lives. This positive mind-set follows us home to benefit our families and the people we interact with outside of Jacobs.

For Further Reference:
- Global HSE Policy Statement

Sustainability Commitment

Jacobs is committed to providing solutions for a more connected, sustainable world. We aim to deliver this by integrating sustainability into our business; through our business model, our procedures, how we deliver our projects and infusing it across our culture. We intend to work collaboratively with employees, clients and supply chain to achieve our sustainability commitments and deliver on our vision.

For Further Reference:
- GSOP 350 – HSE Program
- Jacobs Sustainability+

Quality Commitment

We work safely and protect the health and safety of all around us. We strive for flawless execution of our work, and to deliver superior value to everyone.
Acting Responsibly in the Workplace

Drug and Alcohol Use

We believe the use of alcohol, drugs, or controlled substances in the workplace is unsafe and inappropriate.

You are responsible for abstaining from drug or alcohol consumption in the workplace or in any manner outside the workplace that negatively affects your ability to do your job.

Your health and safety is a paramount concern. Employees are expected to perform their work free from the influence of alcohol, drugs, or controlled substances. The use of these substances creates an unreasonable risk to personal safety, to fellow employees, clients, and the public. Alcohol may be served at certain company functions, but its consumption should be in moderation.

Anyone using illegal drugs or alcohol, or misusing prescription drugs in the workplace will be subject to discipline, up to and including termination.

For Further Reference:
- GPS05-303 – Drug, Alcohol and Contraband
- GPS05-305 – Smoking in the Workplace

Workplace Violence

We believe employees should be free from violence – or the threat of violence – in the workplace.

You are expected to behave in a safe, respectful, and professional manner while at work.

We maintain a zero-tolerance policy toward workplace violence. Workplace violence is broadly defined; it ranges from actual physical assault to threats and verbal abuse and can take place either at the workplace or elsewhere. Damage to property is also prohibited.

The use or possession of firearms or weapons of any kind is expressly prohibited on company property or at any other site where we work in accordance with applicable law.

Employees are required to report all violent incidents or threats. Contact authorities in case of imminent danger.

For Further Reference:
- GPS05-306 – Employee Conduct and Work Rules
ACTING RESPONSIBLY IN THE WORKPLACE

We believe conduct in the workplace should be professional, appropriate and devoted to business efforts.

You are expected to focus your efforts in the workplace on the Company’s business objectives and to perform your work in a professional and appropriate manner.

Employees are expected to use their time and energy to perform their job responsibilities while in the workplace. Use of Company resources, such as information systems (i.e. computer equipment, company networks, accessing the internet) must be appropriate to the workplace.

Points to remember:

- **Company Information Systems.** Transmitting, displaying or viewing images or other media that could be offensive is prohibited in the workplace or on Company information systems.

- **Software Usage.** You may not publish or share any copyrighted software, media or other materials owned by third parties unless permitted by that third party. Downloading illegal copies of music, films, games or other software is also prohibited.

- **Gambling.** Wagering, gambling or playing other games of chance is prohibited and detracts from productivity in the workplace.

Anyone engaging in prohibited use of Company information systems, or gambling in the workplace, will be subject to discipline, up to and including termination.

For Further Reference:
- GPS05-306 – Employee Conduct and Work Rules
- GPS05-304 – Policy Against Harassment
- GPS06-107 - Information Systems Authorized Use
We believe in diversity, inclusion, and treating employees fairly.

You are responsible for treating co-workers with respect.

At Jacobs we are committed to promoting and celebrating inclusion and diversity. Our workforce spans the globe, and our diversity is an asset; we attract and retain talented staff with many different viewpoints. We expect our employees to be respectful of such differences and to treat one another with courtesy and respect.

Jacobs is firmly committed to providing a workplace free of discrimination or harassment for any reason including but not limited to national origin, race, religion, sex, age, marital status, sexual orientation, gender, gender identity or other protected status.

Our team reflects varied cultures, backgrounds and experiences which serve to strengthen our Values. Enabling all employees to have a voice and provide their unique perspectives is fundamental to our organizational growth and future success.

Chairman and CEO Steve Demetriou shares his thoughts on the importance of inclusion and diversity below.

Jacobs Reaffirms Commitment to Inclusion
Our founder, Joe Jacobs, was born into a Lebanese immigrant family and went on to build what is today one of the most successful companies in the world. My own parents emigrated from Cyprus many years ago, so I understand firsthand the importance of a global mind-set and a genuine respect for others.

Today, we serve clients through operations in more than 230 locations worldwide. Our employees come from a variety of backgrounds and bring a wealth of experience to their work each and every day. Additionally, crossing international borders regularly is vital to our business model.

At Jacobs, inclusion means welcoming global backgrounds, experiences and ideas. We value inclusion and diversity because it energizes our people and encourages creativity, collaboration, and innovation. Considering diverse points of view results in better decisions and solutions for our clients, our investors and ultimately, our Company.

As always, I appreciate your dedication to Jacobs’ values and your commitment to serving our clients across the globe.

Thank you,
Steve Demetriou

For Further Reference:
• GPS05-301 – Problem Resolution
• GPS05-304 – Policy Against Harassment
HANDLING PERSONAL DATA

We believe in processing personal data lawfully, securely and responsibly.

You are responsible for handling personal data in a confidential and secure manner.

As the number of ways that personal data can be distributed has increased due to new technologies, so too has concern about maintaining privacy. A number of countries have responded by strictly regulating the distribution of personal data. Jacobs follows these laws; maintaining access, disclosure, retention, and destruction controls that address the rules in the countries where we operate. Privacy laws vary from jurisdiction to jurisdiction, but as a multi domestic company, we’ve designed our global policy to work across regions and to apply to all employees.

We work to protect the privacy of our employees, clients, and business partners no matter where they live or work. Personal data may be processed only if authorized and for legitimate business reasons. If you are entrusted with personal data, you must protect its confidentiality, use it as intended, and keep it secure. If you learn that personal data has been improperly released or exposed, you should immediately notify your manager, the Privacy Team (privacy@jacobs.com) and Jacobs’ Cyber Security organization.

For Further Reference:
- GPS05-110 – Global Privacy Policy
- GPS01-104 – Protection of Confidential Material
- GPS05-106 – Employee Records

Further discussion:
Defining personal data

Personal data contained in personnel or medical records is any information that can be connected to a natural person and can be used to identify a person or the unique characteristics of a person’s data. It can be contained in personnel or medical records; common examples of personal information are date of birth, identification documentation and numbers, passport information, photographs, address and contact information, and payroll and banking records and correspondance. Personal data can also include education details, health and employment history, group membership and affiliations, and opinions about an individual’s performance or abilities.
You are encouraged to be a responsible and active citizen in your community.

Jacobs sometimes uses its corporate voice to educate public officials and promote government support for relevant issues. The Company may express its views through contributions to political activities that do not involve the election of candidates.

Except as permitted, we do not use Company funds for contributions to candidates. You may not make contributions on behalf of the Company. 

Contacts with government officials are highly regulated. You may not contact officials, on behalf of the Company, regarding a policy, regulation or legislation unless the action has been approved by executive management.

Points to remember:

- **Political Action Committee.** The Jacobs Good Government Committee accepts donations from employees to make contributions to support candidates and issues that are deemed favorable to the Company. Participation is personal and voluntary. Coercing others to contribute to or support the PAC or any political position is prohibited. Except for the PAC, you may not make any political contribution on behalf of the Company.

- **Community support.** You are encouraged to be an active and responsible citizen in your community, to participate in civic and support organizations, and to donate to workplace-giving campaigns. Remember that volunteering your personal time can be as important as donating money.

- **Charitable contributions.** Corporate charitable contributions are generally made through the Company’s philanthropic organization, the Jacobs Engineering Foundation. Employees may offer recommendations of worthy organizations and causes. Contact your manager if you have a suggestion. All charitable contributions must be approved by management in accordance with the policies referenced below.

For Further Reference:

- GPS01-103-17 – Charitable and Political Contributions
- GPS01-103-07 – Anti-Corruption Policy
- GPS01-108 – Due Diligence of Third Parties
We believe in protecting the value of our Company’s assets as well as safeguarding the property of others.

You are responsible for treating Company assets and equipment carefully and protecting them from waste, loss, damage, and abuse.

At Jacobs, the assets of our Company—that is, things of financial value—belong to our shareholders. This includes tangible assets such as buildings, furnishings, office equipment, tools, vehicles, cash, and other property used in the execution of our jobs. It also includes intangible assets such as data, designs, processes, information resources, company time, and intellectual property. We are responsible for protecting these assets and using them in an efficient and economical manner. Theft of Company assets may result in termination and criminal prosecution. Similarly, property owned by others—that of coworkers, suppliers and customers—may not be used without permission.

Points to remember:
- **Use of equipment.** Company equipment, including copiers, telephone, internet, and email communication equipment, should be used for the benefit of the Company. Employees should have no expectation of privacy when using Company resources (except as dictated by local laws). They may never be used for offensive or illegal purposes, conducting a business, or helping a competitor. Employees are expected to use good judgment for their occasional personal use of Company assets. The use must be reasonable in duration, must not result in significant added cost, and must not interfere with our business or productivity.

- **Protecting company systems.** Company systems may be used to process or store data, records, or communications; and they may be linked by computers or networks. You must follow all Company security protocols, including the protection of passwords or access numbers to prevent unauthorized use of these systems or networks. You are responsible for the security of information accessed or modified under your password or access procedure.

If you are issued communications and IT equipment for business purposes, the equipment and its contents remain Company property and must be protected and returned. Any loss or theft must be immediately reported.

- **Use of software.** Only approved and licensed software may be placed on Company equipment, and only after it has been checked for viruses prior to installation and use. You may not make unauthorized copies of software programs or use personal software on company equipment.

For Further Reference:
- GPS05-306 – Employee Conduct and Work Rules
- GPS05-106 – Personal Device Access to Company Guest/Public Internet
- GPS06-107 – Information Systems Authorized Use
SAFEGUARDING CLIENT INFORMATION AND BUSINESS INTELLIGENCE

We believe in protecting the confidential information entrusted to us.

You are responsible for taking appropriate measures to ensure the security of sensitive information.

Information is a valuable asset of our Company, our clients, and our suppliers. Information that is unknown to the general public and that could disadvantage someone by its release is defined as confidential. Releasing confidential information can harm our interests. Similarly, misusing information from others violates their trust in us. In any contract or interaction, you should have a clear understanding of what information you are receiving, how you are to deal with it, and what you are to use it for.

Points to remember:

- **Honest communications.** Our relationships are founded on truthfulness and openness. We value honesty not only because it is the right thing to do, but also because it contributes to business profits and productivity. Sometimes being honest means speaking up when something isn’t right; but even when voicing a concern or complaint, be sensitive in how you craft your messages, and remember the difference between fact and opinion. Honesty extends to our sales materials, which must characterize us fairly and accurately.

- **The process of ensuring confidentiality.** A deliberate approach is necessary to protect confidential information. Only accept sensitive or proprietary information from clients or suppliers when you really need it. When creating confidential information, ensure it is treated as such. Familiarize yourself with the system of controls we have in place to manage the receipt, use, and destruction of proprietary information, so that you are able to comply with this process.

- **Exposure to confidential information.** Do not seek out confidential information unless it is vital to the completion of your duties. Get advice immediately if you are inadvertently exposed to or receive confidential information.

- **Gathering business intelligence.** We regularly gather information about our competitors to help us make business decisions. To ensure fair competition and maintain our reputation, the information we gather must be publicly available. You may not seek information through illegal means or by misrepresenting yourself, misusing consultants, or exploiting proprietary information or trade secrets. Finally, our agents, consultants, suppliers, and partners must be bound by the same requirements.

**For Further Reference:**

- GPS01-104 – Protection of Confidential Material
We believe in conducting business with integrity, while avoiding conflicts of interest and personal gain.

Be loyal to Jacobs, avoid conflicts of interest, and make decisions in the best interest of the Company.

A conflict of interest is defined as a circumstance that creates a risk that professional judgment or actions will be unduly influenced by a secondary interest, usually personal. In other words, a situation where the interests of the Company come into conflict with the interests of an individual.

You must avoid conflicts of interest that could cloud judgment, impair objectivity, and interfere with good decision-making. You should never achieve personal gain through a Company transaction or by the use of Company information. Corporate opportunities belong to the Company. Even creating an appearance of conflict should be avoided. If a conflict cannot be prevented, it must be mitigated by full disclosure. Disclosure should involve an evaluation of the situation by a disinterested party. If you find yourself in a situation that involves a potential conflict of interest, immediately contact your manager, the Human Resources department, the Legal department or the Ethics & Compliance department.

**Points to remember:**

- **Insider trading.** Stocks or other securities may not be purchased or sold while in possession of “material non-public information.” This is defined as information that a reasonable investor would consider important in making an investment decision and that is not known to the general public. The Company’s financial results, financial projections, a material acquisition or joint venture and material litigation that have not been broadly disclosed to the public are just some examples of things that may constitute material non-public information. This also applies to information about our clients and others we do business with. You are also prohibited from disclosing material non-public information to anyone other than those within the Company whose jobs require them to have such information. You may not provide “stock tips” to family members or others who may trade on the basis of such information. Additionally, our directors, senior management and others who regularly have access to material non-public information (known as “insiders”) must obtain pre-clearance before trading in Company securities and are subject to trading blackout windows. Insiders are also restricted from shorting, hedging or pledging Company stock.
3 DOING YOUR JOB WITH INTEGRITY & DISCRETION

ACTING WITH INTEGRITY AND AVOIDING CONFLICTS OF INTEREST

• **Business with friends or relatives.** You should avoid conducting business with friends or relatives and take care not to be influenced by secondary interests. Business with friends and relations can result in favoritism, cronyism, or nepotism and give undue advantage to someone who does not otherwise merit it. This is unfair and breaches your primary duty of loyalty to the Company.

• **Personal conflicts.** You may not supervise anyone in your family, or maintain a close personal relationship with a subordinate employee. Furthermore, a family member working for a client or competitor can create a conflict of interest or the appearance of a conflict, as can having a financial interest in or receiving compensation from a competitor or supplier.

• **Disclosure.** You are required to fully disclose any conflicts—personal, social, political or financial—prior to entering into the relationship.

**For Further Reference:**
- GPS03-105 – Employment of Relatives
- GPS01-103-13 – Conflicts of Interest
- GPS01-103-16 – Insider Trading
INTERACTING WITH THE MEDIA

We believe in maintaining Jacobs’ reputation by presenting a consistent message to the media. In order to do this, we follow a policy that prohibits Jacobs’ employees from speaking to the media on behalf of Jacobs without explicit permission from Global Communications.

You are responsible for seeking approval from the office of the Vice President of Global Communications prior to any interaction with the media on behalf of Jacobs.

Jacobs enjoys the well-earned reputation of a company that follows the highest principles of conduct, integrity, and ethics. In our interaction with the media, we are careful to protect that reputation—and the reputations and confidentiality of our clients—above all else. We also have special considerations and legal responsibilities as a publicly traded company and must adhere to the rules of the Securities and Exchange Commission (SEC) as well as other agencies on occasion.

For these reasons, all media interaction at Jacobs is handled at Corporate Headquarters. Employees are not official spokespersons of the Company and may not participate in interviews or make public announcements or statements to the press on behalf of Jacobs without the prior approval and participation of Global Communications. If you are approached with a media inquiry or interview request, notify Global Communications so the opportunity can be reviewed and appropriate action taken. Likewise, all technical papers, presentations, and client materials that mention Jacobs must be reviewed and approved by Global Communications prior to submission for publication or presentation at a conference or trade show, to assure that copyright and intellectual property considerations are properly dealt with.

Images and photography are critical components of our brand. Photography and image use often has stringent copyright, trademark, licensing, intellectual property, right-to-privacy, and client permission requirements. You must comply with the rules outlined in Jacobs’ Images & Photography Style Guide.

Jacobs is proud of the accomplishments and contributions of our employees and of the work we do. By following Jacobs’ media relations policies and procedures, we are able to share significant news about our Company’s activities with the public while ensuring that the information is appropriate, factual, consistent, and in the best interests of our clients and our company.

For Further Reference:
• GPS01-105 Media Interaction and Press Releases
• Images & Photography Module of Jacobs Style Guide
INTERACTING ONLINE

We believe online activities can provide numerous social, professional, and personal benefits, but can also pose a risk to the Company if misused.

You are responsible for behaving with discretion online.

Exercise good judgment when using the internet for personal or professional activities. Social media (such as LinkedIn, Facebook, Twitter and any other service that allows open exchange over the Internet) has enormous potential for opening communication, but also carries risks. Standards of honesty, discretion, and confidentiality are as essential online as they are in any other setting. You should never release non-public financial or operational information about your work at Jacobs.

Online communication is public and permanent. Whether expressing an opinion or merely chatting, take precautions to use good judgment. When you communicate online, you are representing yourself; you are not a Company spokesperson. You should make it clear that your communications represent your personal views and do not represent Jacobs’ views. It is never permissible to disclose confidential, proprietary, or non-public information related to your work; whether it belongs to us, a customer, partner, or supplier.

For Further Reference:
- GPS06-107 – Information Systems Authorized Use
- JGuide-06-001 – Global Guidelines for use of Social Media
DOING YOUR JOB WITH INTEGRITY & DISCRETION

COMPETING FAIRLY

We believe in maintaining competitive advantage through fair and honest means.

You should comply with antitrust laws and compete fairly and with integrity.

Jacobs provides services of the highest caliber and has no need to compromise its integrity to succeed. We are committed to complying with antitrust and fair competition laws and believe everyone benefits from open and free markets. Competitive advantage is earned through superior performance, not through unethical or illegal business practices.

We do not share bid information or make agreements with competitors to divide markets, allocate customers or locations, or direct the outcome of the bidding process. Our prices are determined by the costs we incur, the value we provide, and the risks we assume.

Points to remember:

- **Rules we must follow.** Many countries, including the United States and the European Union, have laws that define anti-competitive practices. Generally, illegal practices are defined as any agreements—written or informal—that fix prices, restrain trade, or promote anti-competitive activities.

- **Dealing with competitors.** There is certain information we may not share with competitors; such as prices, pricing policies, terms and conditions, trade secrets, intellectual property, and business strategies - whether ours or someone else’s. Similarly, we may not disparage, mislead, or misinform competitors. Information passed on during trade shows or through industry associations should be monitored for possible violations of these rules.

- **Agents, suppliers, and subcontractors may also be sources of improper information.** Be on guard for improper appearances that may be created when working with others as well as substantive issues.

For Further Reference:

- GPS01-103 - 14 – Antitrust

COOPERATION AND HONESTY
We believe properly maintained business records provide a necessary framework to support decisions in day-to-day operations.

You are responsible for keeping records that are timely, correct and complete.

Business documents play a significant role in tasks such as financial reporting, personnel management, execution of projects, and regulatory compliance. No matter what their purpose, you are required to prepare records that are timely, accurate, complete, detailed, and understandable. You must be able to back up information on records so that they are supportable and auditable. We do not tolerate falsification or alteration of records.

Points to remember:

- **Proprietary or confidential information.** Many of our business documents contain information that must be protected from improper use or release, either because of the nature of the information itself (for example if it is private, unique, or valuable) or because of the requirements of a contract or regulatory authority. We safeguard the security and confidentiality of documents commensurate with the sensitivity of the information. Disclosure requires proper prior approval and a legitimate business need.

- **Labor Accounting.** Time is a precious Company asset. We bid it, sell it, and bill for it. Time is the primary source of our revenue and critical to our profitability. A timesheet is the legal authority to both pay an employee and get reimbursed by a client. Our policy requires employees to provide an accurate and timely accounting of their hours worked and leave used, entered in their timesheets.

- **Financial statement reliability.** We routinely file certified financial statements for the investment community and the public. As a U.S. public corporation, we are required to create and maintain a system of controls that is designed to assure the reliability of our financial records. You must understand the internal controls relevant to your position and commit to following policies and procedures for complete and accurate accounting. Controls undergo regular testing by internal and external auditors to assure the information we provide the Securities and Exchange Commission complies with regulations, standards, and practices.

- **Records retention.** Individuals in project and corporate support positions are responsible for planning the record management needs of their operation through a planning process that identifies legal and contractual retention requirements, defines access, delineates preservation and storage, and sets destruction schedules. Records may not be destroyed contrary to directions or if there is a reasonable possibility they will be necessary to an investigation or litigation.

For Further Reference:

- GPS01-106 – Records Retention
- GPS01-107 – Operations-Labor Charging Procedure
DOING YOUR JOB WITH INTEGRITY & DISCRETION

PREVENTING BRIBERY AND CORRUPTION

We believe in winning jobs and executing work honestly, without resorting to bribery, corruption, or kickbacks.

You are responsible for behaving legally and ethically, as well as for understanding and following our anti-corruption policy.

At Jacobs, we develop and maintain business relationships without giving improper gifts, taking unfair competitive advantage, or receiving kickbacks. We win jobs and execute our work honestly and ethically, whether in our dealings with public entities and government officials, or the private sector. Every country in which we operate has laws against corruption. It is a crime to offer, promise, pay or receive anything of value to secure and maintain business or gain an improper advantage, and a violation of our ethical standards to fail to execute work honestly and ethically. These laws restrict us in giving business courtesies to government officials. Anything of value can be a bribe or create the false impression of a bribe. Keep in mind that even the perception of corruption harms our reputation, and we strive to avoid even the appearance of wrong-doing.

Points to remember:

- **No bribery or corruption.** At Jacobs, we do not offer or accept bribes or kickbacks in any form and we do not tolerate corruption in connection with any of our business dealings. You may not offer or receive bribes or kickbacks to, or from, any individual, whether that individual is a government official or a private party.

- **Offering Gifts and Hospitality.** Gifts, Hospitality, and other business courtesies must be carefully handled to avoid even the perception of corruption. This is particularly true when dealing with government officials. Hospitality may be offered to clients when it is permitted by law, consistent with customary business practices, and when the client’s policy permits it. Hospitality or modest refreshments offered during business hours in an office setting are generally allowed. Gifts or other courtesies must be reasonable, modest, and offered with no expectation that anything will be provided in return. Before you offer any Gift or Hospitality, you must familiarize yourself with the Gift and Hospitality Policy for further detailed guidance which may prohibit such business courtesies, or require advance written approval if they exceed certain monetary thresholds.

- **Soliciting or accepting Gifts and Hospitality.** You may never request or solicit a Gift, Hospitality, meal or anything of value. When offered (unless you are in a procurement role), you may accept small memorabilia, or promotional or token items of modest value. Gifts must be infrequent, transparent, and received with no obligation or expectation of a reciprocal action. Before you accept any business courtesies, you must familiarize yourself with the Gift and Hospitality Policy for further detailed guidance which may prohibit your acceptance of such Gifts or Hospitality or require advance written approval if they exceed certain monetary thresholds.
3 DOING YOUR JOB WITH INTEGRITY & DISCRETION

PREVENTING BRIBERY AND CORRUPTION

- **Making facilitation payments.** Payments made to expedite routine government actions — known as facilitation payments — are prohibited. Facilitation payments are typically demanded by low level and low income officials in exchange for providing services to which one is legally entitled without such payments. While they may be small in value, or even customary, it is impossible to regulate and constitutes an illegal practice in most countries.

- **Due Diligence on third parties.** Before we form a relationship with a third party, we must obtain internal approvals and exercise due diligence on the backgrounds and business practices of individuals and entities who will act on our behalf.

For further discussion:

**Defining bribery**
Anything of value can be a bribe. This includes money, gift cards, travel expenses, meals and drinks, lodging, gifts, services, prizes, entertainment, recreation, and political and charitable contributions.

**Defining kickbacks**
A kickback is when a supplier or subcontractor offers or pays us a bribe to improperly influence our judgment. It is presumed that the bribe is included in the subcontractor’s price.

**Defining government officials**
A government official is any official of a government, political party, candidate, or an employee of a company owned or controlled by a government. Jacobs’ policy prohibits offering anything of value to any government officials.

**Defining improper advantage**
An improper advantage is anything to which the Company was not clearly entitled possibly through collusion or coercion. In other words, it is a preference or benefit that has been secured improperly, regardless of the cost expended or the value received.

**Defining collusion**
The agreement or arrangement for illegal, deceitful, or improper purposes.

**Defining coercion**
The threat or use of force or power to compel an action or decision against one’s will.

For Further Reference:
- GPS01-103-07 – Anti-Corruption Policy
- GPS01-108 – Due Diligence of Third Parties
- GPS01-103-12 – Gift and Hospitality Policy
- GPS01-103-17 – Charitable and Political Contribution Policy
- GPS01-109 – Supplier Code of Conduct

UNDERSTAND OUR ANTI-CORRUPTION POLICY
COMPLYING WITH INTERNATIONAL TRADE LAWS

We believe in the importance of trade laws and we comply with all relevant restrictions.

You are responsible for understanding trade laws, restrictions, or sanctions that apply to your work, and for seeking expert advice whenever necessary.

Export control laws govern international trade and affect the transmission of goods, services, and technology across national borders. The U.S. restricts the shipment, transmission, and transfer of certain types of information, technologies, or products overseas or to foreign nationals on U.S. soil. The rules also apply to “re-exports” from one foreign country to another.

We recognize that countries have differing regulations regarding commerce, and that some may conflict with those of the U.S. As an employee of a U.S. corporation, you must comply with U.S. rules, no matter where you are located or where you are doing business. Consult with your manager if you discover a conflict between U.S. law and applicable local law.

Our Company does not conduct commerce with countries against which there is an embargo or other prohibition. We comply with U.S. anti-boycott laws that prohibit refusing to do business with certain countries, people, or organizations, and we report requests for boycott information when required.

Points to remember:

- **Complying with export restrictions.**
  Our goods and services are produced in many countries and shipped across many borders, therefore the rules can become very complex. Not adhering to them could expose the Company and individuals to fines, penalties, and other more serious consequences. It is crucial that you seek advice on trade regulations from your office’s legal representative before making commitments or engaging in action. This is also true if we have partners or agents acting on our behalf.

- **Exempt activities.** Although many of our activities are exempt from export controls, some may be restricted and some may require a license. Even if our activities are excluded or exempted, regulations dictate that we must be able to document that certain activities do not require a license and provide a record of export control reviews demonstrating the exemption.

- **Conflicts with U.S. sanctions.** As an employee of a U.S. registered company, you are responsible for complying with any U.S. sanctions that may be in effect. Home country sanctions may also apply. If you are in a situation where home country sanctions are in conflict with U.S. sanctions, seek advice from the Legal department. In general, the most severe or restrictive sanction usually applies in such situations.

For Further Reference:

- GPS01-103-9 - Compliance with Export Laws
DOING YOUR JOB WITH INTEGRITY & DISCRETION

WORKING WITH THE GOVERNMENT AS A CUSTOMER

We believe in meeting the unique requirements of public-sector clients through ethical, transparent business practices.

You are responsible for understanding and complying with Jacobs’ public-sector policies.

Doing business with public-sector customers often means following different rules than those for private-sector clients. Jacobs’ strict compliance programs for government clients ensure that we meet all the qualifications of public-sector contracting. These programs, combined with our integrity and operational excellence, boost our reputation and contribute to our status as a market leader. You need to know how these programs and policies affect you, and you must always act with awareness of these issues when dealing with public clients.

Points to remember:

- **Procurement Integrity.** The U.S. government — as well as many other public sector entities — prohibits obtaining, using, or disclosing contractor bid, proposal, or source selection information. This prohibition applies to Jacobs, to our agents, and to current or former government employees. Additionally, this prohibition limits our ability to hire or even discuss employment opportunities with federal employees who are or were substantially involved in procurement involving Jacobs. Please understand that these prohibitions may apply to other public sector work as well.

- We’ve built a strong team of experts in public-sector contracting who understand the complications of these rules. These experts act as a resource for the entire Company. If you need advice on this topic, reach out to the following:
  - The Contracts Management Group
  - The Legal department.
  - Special accounting and estimating personnel in the Accounting and Finance Group.
  - Business Development staff who sell to public-sector agencies.

- **Working with classified or restricted information.** When working on a project that involves classified or restricted information, you have a responsibility to safeguard emails, electronic documents, and printed information pertaining to the project. Use appropriate security measures with regard to passwords, keeping track of equipment, locking files containing confidential data, and taking particular care to keep their systems and sensitive data secure from unauthorized access. It is also important that you securely dispose of unnecessary confidential information in an approved manner.

For Further Reference:
- GPS01-103-6 – FAR 52.203.13 – Compliance Program
Business practices for government clients

- Accurate and complete timekeeping is required for all projects, but for the U.S. government, time entries become legal documents. Keeping them correct is the law.
- Governments are entitled to more cost and pricing information than we would necessarily provide to private-sector clients.
- Government proposals must include details of our business systems to prove we can support performance. For some types of contracts, we must be pre-qualified to bid.
- Embellishments or exaggerations are not allowed. Anything we say or write must be truthful. (This goes for our dealings with private-sector clients as well.)
- We often transfer work between divisions, but this may not always be acceptable for government clients. Selling to affiliates or subsidiaries is guided by rules on what may be charged and how work must be documented. Know the rules before you act.
- Government clients regularly evaluate our performance, and these evaluations are posted on a public website. So how we perform is public knowledge.
- Public clients have broad audit rights that allow them to review almost every document prepared for a project. Within certain limitations, clients can even interview employees. If a government representative visits your office, immediately contact your manager for advice on how to handle the situation.
- Our ethics and integrity program fulfills requirements of the U.S. government to promote ethical behavior, prevent legal violations, and investigate allegations of fraud, bribery, false claims, and conflicts of interest. We are required to report our investigations and disclose our findings to the government.
- Specialized business requirements for government clients apply not only to our employees but also extend to everyone involved in a project, including partners, representatives, suppliers, and subcontractors. We must ensure that all parties we work with are in compliance.
INVESTIGATING VIOLATIONS AND PROHIBITING RETALIATION

We conduct fair and thorough reviews of possible non-compliance with our policies, and appropriate consequences for violations will be enforced.

We do not retaliate against people reporting misconduct.

You are responsible for cooperating with audits and investigations and complying with corrective measures.

We encourage employees to report any questionable accounting and auditing practices, policy violation, or other wrongdoing. You may do this in confidence, anonymously where allowed by law, and without fear of retaliation. Additionally, the U.S. and many other governments around the world provide protections to those who report violations.

We conduct audits and internal investigations to check for compliance with policies and rules, to follow-up on reports of non-compliance, and to assess the effectiveness of our programs. We strive to be prompt and fair in our investigations. We cooperate with government investigations and inquiries to the greatest extent possible. Should you be informed of any warrants, subpoenas, or court orders regarding your work, you must contact the Legal department immediately. If you are involved in an investigation, you are expected to cooperate fully and comply with corrective measures if they are found to be needed.

Jacobs and Jacobs personnel do not retaliate against individuals who engage in activities that are consistent with Jacobs policies, refuse to engage in unlawful activities, or make a good-faith report of wrongdoing or policy violation. No personnel shall be discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against in the terms and conditions of employment for such actions, refusals, or reports. We will review complaints of retaliation, and any attempted or actual retaliatory action which may subject the violator to disciplinary action, up to and including termination of employment.

We will take all reasonable steps to protect and respect the rights of a person who reports alleged improper, unethical or illegal conduct or who participates in an investigation. If you become aware or are concerned about departures from, or an attempt to depart from, the Code of Conduct, or other improper, unethical, or illegal conduct, please contact the Ethics & Compliance department at compliance@jacobs.com or through the Jacobs Integrity Hotline at https://integrity.jacobs.com (1.844.543-8351 in the US); see page 28 for international numbers or askaquestion@jacobs.com.

For Further Reference:
- GPS01-103-8 - Audit and Investigation
- GPS01-103-15 - Whistleblower Protection
MAKE THE CALL: THE INTEGRITY HOTLINE

The Jacobs Integrity Hotline is available to employees and others who wish to report non-compliance or suspected violations of law and policy, or to seek guidance on specific situations regarding company policy. The Hotline is available 24 hours a day, 7 days a week. Reports may be made anonymously at https://integrity.jacobs.com or at telephone number +1(844) 543-8351. Jacobs strictly prohibits any form of retaliation against an employee who makes a report in good faith out of genuine concern.

Instructions for international callers to the Integrity Hotline:

1. Dial the direct access code for the country you are calling from, then wait (for example, if calling from India – dial 000.117 then wait).

2. After a brief pause, you will be directed to an automated AT&T line requesting you to dial the number you are attempting to reach.

3. After the prompt, please dial 844.543.8351.

4. Wait until the Integrity Hotline is answered by an operator, then you may report your question or concern.

5. Please ask for an interpreter if you want to speak in a language other than English.

THE JACOBS INTEGRITY HOTLINE:
844.543.8351 or https://integrity.jacobs.com

FOR A FULL LIST OF TOLL FREE NUMBERS PER COUNTRY SEE THE FOLLOWING PAGES
## THE INTEGRITY HOTLINE: TOLL FREE NUMBERS

### THE JACOBS INTEGRITY HOTLINE: 844.543.8351

**Toll-Free/Free-Phone Access Numbers**

<table>
<thead>
<tr>
<th>Your Country</th>
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<td><strong>ITFS</strong></td>
<td></td>
<td>1.800.316.728</td>
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<tr>
<td>Bahrain</td>
<td>*WWC</td>
<td>Bahrain (US Military Bases) – 800.000.00</td>
<td>844.543.8351</td>
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<td></td>
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<td></td>
<td>Bahrain (Cellular) – 800.00.05</td>
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<tr>
<td>Brazil</td>
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<td>(Cellular) – 0.800.888.8288 • 0.800.890.0288</td>
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<td></td>
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<td>Chile</td>
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<td>Chile (Telmex - 800) – 800.225.288</td>
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<td>Chile (Telefonica) – 800.800.288</td>
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<td>Chile (ENTE) – 800.360.311</td>
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<td>Chile (Easter Island – Spanish) – 800.800.312</td>
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<td>China</td>
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<td>1.800.81.8677</td>
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## THE INTEGRITY HOTLINE: TOLL FREE NUMBERS (Cont.)

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*Please note that countries with the line type “WWC” (World Wide Connect) are a two-step dialing process. The reporter first has to dial a country-specific access code, followed by your domestic number.

**ITFS, GIS, Domestic, Collect calls are a one-step dialing process rather than two-step. If it’s a one-step dialing process, there is no AT&T Direct Access Code listed."
4 CONCLUSION

ASK BEFORE YOU ACT

With Jacobs’ Vision, Mission and Values in mind and this Code as a guide, you can properly navigate most situations you come across in the course of your work.

If ever in doubt, remember to ask before you act: askaquestion@jacobs.com

Thank you to each and every employee for your commitment to excellence, and for helping us maintain the trust of our clients and business associates. We value your contributions to Jacobs’ ongoing success.
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<td>GPS01-103-12</td>
<td>Gifts and Hospitality</td>
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<td>GPS05-105</td>
<td>Employment of Relatives</td>
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