

THE JABIL CODE

Jabil's unique Company culture, centered on having the best people in the world and empowering them to excel, has made us a leader in the diversified manufacturing industry. We have nurtured this culture carefully over the years and I am deeply gratified by the way people from all over the world have readily accepted and worked hard to preserve the unique characteristics of Jabil's culture. I would like to remind everyone that an important part of our culture is to conduct our business with the highest regard for integrity and business ethics. As we have grown, we have formalized aspects of our Company culture in training through Jabil's Learning and Development Team and the "Rules of the Road". We believe it is equally important for us to formalize our expectations regarding business integrity and ethics and our "Jabil Code" will serve this purpose well.

We pride ourselves in being creative, flexible, open and empowering. Our day-to-day business interactions with each other are guided by the Jabil "Rules of the Road". You should look to this set of guidelines to have an appreciation for our unique and empowering Company culture. The "Cultural Creed" portion is particularly helpful in this regard. We believe that by minimizing bureaucracy and maximizing control of your own destiny, you will make the best decisions for the business.

In all cases, our business decisions must strive to be in accordance with the highest degree of professional business ethics. We have an obligation to our shareholders, and to each other, to conduct business lawfully and with the utmost integrity. Look to the Jabil Code for guidance in meeting this important obligation. The Jabil Code is not a list of "thou shall nots." It is simply impossible to envisage all possible business scenarios that might be encountered when drafting a Code such as this, so we expect you to look to this Code as a beginning point for charting the right ethical course to follow. Where the Jabil Code is not explicit and you are in doubt, you only need to employ one essential principle: "Do the right thing".

Sincerely,

Mark T. Mondello
Chief Executive Officer

GOALS & EXPECTATIONS

The Jabil Code underscores our fundamental values and is intended to help us understand how to make proper and ethical day-to-day business decisions. For the purpose of this Code "employees" should be deemed to include all Jabil directors, officers and employees.

The goals of the Code include:

- Informing employees of the cultural and behavioral expectations for engaging in proper and ethical business conduct.
- Providing guidance for relevant regulations, laws and policies affecting our employee's day-to-day activities.
- Facilitating a process for addressing issues and questions involving appropriate business conduct.
- Identifying a confidential means for employees to report suspected violations of the law.

Key cultural expectations we hope this Code will facilitate:

- Compliance with all applicable regulations, laws and policies governing our business conduct worldwide.
- Being honest, fair and trustworthy in conducting all Jabil activities.
- Being aware of and avoiding conflicts of interest between work and personal affairs.
- Sustaining an atmosphere of fair employment practices extending to every member of the Jabil workforce.

- Helping to ensure a safe workplace and protection of the environment.
- Nurturing a culture where ethical conduct is recognized, valued and exemplified by all employees.

Jabil is ever-changing. We operate in a dynamic industry and, as a result, every ethical and legal issue simply cannot be anticipated and this Code cannot provide all the answers. It must operate as a guide to help you resolve ethical and legal questions. It should be read and interpreted in a manner consistent with the geographical locations in which we do business. It is our responsibility to use this Code and our common sense when we have questions regarding our behavior or that of others. When all else fails, we must ask for assistance when answering such questions. Most of all, we must always simply "do the right thing".

BUSINESS VALUES

Integrity - A Cornerstone of Who We Are

A cornerstone of the way we do business is clearly our integrity. All interactions with customers, vendors, suppliers, shareholders and fellow employees are to be conducted with the utmost integrity, honesty and mutual respect.

Determination - Our Constant Drive for Excellence

We must continuously strive for excellence. We can never be satisfied with who we are today...even if we are number one. We can, and will, be even better tomorrow.

Empowerment - Our Employees Are Our Most Valued Asset

We will strive to build a team that is empowered, dedicated to self improvement and professional growth and committed to winning. And we'll have fun while we are doing it. That means we do not tolerate any unnecessary bureaucratic or political behaviors. Simply put, we'll always try to "do the right thing" in how we interact with each other.

Respect - Our Business Partners

Our strategic business partnerships with customers, vendors and suppliers all produce shareholder value. We must nurture and grow these relationships by conducting our daily business in a respectful, honest and competitive manner.

Commitment - Our Shareholders

We are a publicly traded Company. We have a duty to our shareholders to increase the value of their investment and to vigorously safeguard it. We owe it to them to continuously "do the right thing" in each facet of our business. That means we must be at our best not only competitively but ethically as well. We will strive to increase shareholder value each and every day.

RECORDS

Maintaining Accurate Records

All Company records must be accurate and complete. They are necessary for the proper management of the business, and the law specifically requires it. Records must be maintained with sufficient detail to accurately reflect the Company's transactions. Financial statements must always be prepared in accordance with generally accepted accounting principles and presented fairly, in all material respects, the financial condition and results of the Company.

Proper records management is an important matter for Jabil. The failure to manage records according to the Jabil [Records Management Policy](#) and [Schedule](#) could have serious business and legal consequences for our Company. Use common sense and observe standards of good taste regarding content and language when creating business records and other documents that may be retained by Jabil or other third parties. This includes e-mail communications. While they are a quick and easy method of communication, e-mails should always be utilized as an important business tool and a professional mode of communication.

THE SENIOR CODE

An Additional Jabil Code for Jabil's Principal Executive Officers and Senior Financial Officers

Providing Jabil investors with accurate, dependable information is of critical importance to Jabil's management team and the Jabil Board of Directors. Ethical practices anchor Jabil Management's philosophy for running our business and our Board of Directors is committed to holding itself up to the highest ethical standards. Jabil's Management and Board have proactively taken action to comply with Sarbanes-Oxley and NYSE corporate governance requirements including the adoption of an additional [Jabil Code specific to our Principal Executive Officers and Senior Financial Officers](#).

OUR EMPLOYEES

Equal Opportunity and Diversity

Jabil offers equal employment opportunity to qualified individuals without regard to their race, religion, color, national origin, age, gender, citizenship, marital status, disability, sexual orientation or other factors not related to their job performance. We believe the diversity in skills, abilities, experience and backgrounds of our employees is a strength and encourage it in all areas of the Company. We encourage and support self-development through individual assistance and the opportunity for professional growth provided by Jabil's Learning and Development Team.

Our Work Environment

We encourage a work environment that is free from safety and health hazards, intimidation and harassment, or any other behavior not conducive to productive and excellent work. We must be aware of and abide by all health and safety rules applicable to our jobs.

Personal information of employees will be respected and safeguarded. Access to such records is restricted. Jabil will comply with all applicable laws regarding the disclosure of personal information about our employees.

Communicating with Each Other

Employees are encouraged to communicate respectfully, openly and honestly with one another including supervisors and management. Jabil respects, encourages and welcomes employee's opinions, attitudes and concerns in our continual effort to be simply the best.

JABIL ASSETS

We have a responsibility to properly use and protect the assets of the Company. Assets can be both tangible (such as buildings, furniture, computer systems and equipment, inventory, tools and funds) as well as intangible (such as trade secrets, work time, marketing and pricing strategies). All electronic information transmitted or contained in the Company's information systems is the property of the Company and should be properly safeguarded and used only for job-related purposes.

Personal Use of Jabil Assets

Employees are expected to use common sense when using Company assets to perform routine personal tasks during non-work time such as placing personal telephone calls, faxing, sending personal e-mails and briefly accessing legitimate commercial websites. Access to e-mail and the Internet may be monitored in accordance with applicable law and there is no assurance of privacy. Visiting websites that contain racist, pornographic, gambling or other inappropriate materials is prohibited. Other specific examples of inappropriate use of Jabil assets are the personal use of: Company vehicles for non-business reasons; Company tools or equipment; Company paid mail; Company supplies; Company assets for personal gain and long distance services at Company expense. It is important for each of us to be familiar with, and comply with Jabil's [Information Security & Risk Management Policy](#) as well as Jabil's [Social Media Policy](#).

Taking Advantage of Corporate Opportunities

Employees should not take for themselves personally, opportunities that are discovered through the use of Jabil property, information or position.

INSIDER TRADING

U.S. securities laws, and the laws of most countries in which Jabil does business, prohibit trading of any stock or other securities while in possession of inside material, nonpublic information regarding those securities. Insider trading, insider dealing and stock tipping are prohibited at Jabil. These are some important definitions that will assist you in understanding the types of activities that are proscribed.

Inside Material Nonpublic Information: any non-public information that a reasonable investor is likely to consider important in making investment decisions. This includes any non-public information that would influence your own decision to buy or sell a company's stock or other securities. Even the appearance of insider trading should be avoided.

Insider Trading or Insider Dealing: Personally buying or selling stock or other securities of a company while in possession of inside material, nonpublic information about that company.

Stock Tipping: Disclosing inside material, nonpublic information about a company to allow a person to buy or sell stock or other securities of that company based on that information.

Observance of the following will help you to avoid an allegation of insider trading:

- Do not buy or sell stock or other securities of a company while you have material, nonpublic information or inside information about that company.
- Do not recommend or suggest that anyone else, buy, sell, or retain stock or other securities of any company while you have material, nonpublic information inside information about that company.
- Do not disclose material, nonpublic information inside information to others unless they have legitimate business reason to know it and such disclosure is made in compliance with Jabil's [Regulation FD Policy](#).
- If the inside information concerns Jabil, disclosure is only appropriate if it is necessary for Jabil to carry on its business properly, and you have taken appropriate steps to prevent misuse of the information.
- Consult with Jabil Legal if you have any questions.

Please follow this link to read and comply with Jabil's policy on [Insider Trading](#).

GLOBAL COMPETITION

Jabil engages in free and fair competition throughout the world. Most countries have laws ("antitrust" or "competition") that prohibit restraint of trade through such activities as price-fixing, allocating customers or territories and abusing a dominant market position. We must abide by these laws. These laws have been, and continue to be, an important contributor to the free markets in which we operate. Each employee should endeavor to deal fairly with Jabil's customers, suppliers, competitors and other employees. None should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Competitors' Information

Any information that Jabil distributes must be accurate and objective including information regarding our competitors. No employee should make false or misleading statements about competitors, their products or services. Obtaining information about the competition is an important and accepted practice provided it is accomplished in a proper, legal and ethical manner. There are limits on how such information may be collected, especially confidential information. We must be careful never to cross the line of impropriety when seeking competitor information. It is clearly improper to knowingly acquire confidential competitive information through misrepresentation, deceit or false pretense.

CONFLICTS OF INTEREST

Jabil recognizes and respects that employees may take part in legitimate financial, business and other activities outside of their jobs. However, those activities must always be lawful and free of conflicts with respect to our responsibilities as Jabil employees. We must never misuse Jabil resources, influence and assets or otherwise discredit Jabil's good name and reputation. A "conflict of interest" occurs when an individual's private interest interferes in any way with the interest of Jabil.

Avoiding Conflict:

- Disclose to your immediate supervisor any outside activities, financial interests or relationships that may present a conflict of interest or even appearance of a conflict.
- Exercise good judgment in all personal and business dealings.
- Never misuse Jabil resources or assets by using them for other than a legitimate Jabil business purpose.
- Obtain management approval before accepting any position as an officer, director, consultant or employee of any outside business concern.
- Never compete with Jabil.

Red Flags Signaling Possible Conflicts of Interest

- Holding a financial interest in a company that does business with or that could otherwise affect Jabil's business.
- Taking a job that may interfere with your job at Jabil or tempt you to use Jabil working hours or equipment to carry out that job.
- Misusing Jabil resources or influence to promote or assist an outside business.
- Conducting business with, or employing, a spouse, relative, or close personal friend.

Gifts and Entertainment

In certain circumstances, the offer and receipt of gifts and entertainment are an accepted practice to establish and foster valuable business relationships. Gifts and entertainment are broadly defined to include physical things; such as events, trips, services, benefits and anything else of value. Inexpensive business gifts as well as routine entertainment functions and business meals will not generally violate this policy as long as they are appropriate for the circumstances and do not create an appearance of impropriety. We must always be vigilant to exercise good judgment in this practice. All gifts and entertainment must comply with Jabil's [Foreign Corrupt Practices Act, UK Bribery Act and Anti-Corruption Policy](#) and [Global Travel & Entertainment Policy](#).

INTELLECTUAL PROPERTY

One of Jabil's most valuable assets is our intellectual property. This includes our patents, trademarks, copyrights, trade secrets, and other confidential information. It is our legal and ethical duty to protect not only our intellectual property but the intellectual property of our customers, suppliers and other companies with whom we do business.

Safeguarding Intellectual Properties

- Identify and distinguish between Jabil's intellectual property and that of others with whom we do business.
- Protect it with appropriate documents such as nondisclosure and confidentiality agreements. When appropriate clearly mark items as proprietary and confidential.

- Do not duplicate, install or use software in violation of Jabil policies, copyrights, trademarks or applicable license terms. This includes software installed on your computer or on network areas.
- Do not allow outside parties to use the Jabil logo or trademarks unless authorized by Jabil Communications Department.
- Do not improperly share any of Jabil's sensitive, confidential or proprietary information with others. Be aware of the appropriate scope of the information to be disclosed and protect it with an approved non-disclosure agreement and by marking it as confidential and proprietary. If you require assistance first contact your supervisor or Jabil Legal, if necessary.

INTERNATIONAL BUSINESS

Jabil conducts business in many different countries and is committed to following the laws and regulations in effect wherever we do business. All transactions must be conducted in accordance with applicable laws.

Such Anti-Corruption laws include the United States Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act ("Act"), which prohibit the payment or offering of anything of value to government officials for the purpose of securing or maintaining a business advantage. In addition, the Act makes it a crime to give or offer anything of value to any person (public or private) as well as to receive anything of value from such parties in order to secure or gain a business advantage. The FCPA and Act also require the Company to maintain accurate financial records and adequate internal financial controls. Each employee must be alert to the potential for improper payments, including inappropriate gifts. All gifts and entertainment must comply with Jabil's [Foreign Corrupt Practices Act, UK Bribery Act and Anti-Corruption Policy](#) for explanations, processes and examples of the applicability of these requirements with Jabil business activities.

Jabil will not participate in any boycott not sanctioned by the United States or the United Nations, nor provide information that could be construed to further unsanctioned boycotts.

WAIVERS

Only the Board of Directors, or a designated committee of independent directors, may grant waivers from the provisions of this Code involving an executive officer, financial executive or director. Granting of any such waiver shall be promptly disclosed to shareholders and otherwise disclosed as required by law. Any other employee may request a Code waiver from his or her immediate supervisor, and such waivers shall only be acquired with the advance approval of Jabil's General Counsel. In general, the granting of waivers is discouraged.

ENFORCEMENT

Abiding by the Jabil Code

Our employees are not only encouraged, but have a responsibility, to bring violations or suspected violations of the Jabil Code to an appropriate party. You may report such violations to your supervisor, Human Resources, Internal Audit or Jabil Legal.

Suspected legal and other wrongdoing may also be reported via the Global Compliance Hotline. Visit the [Global Compliance Hotline](#) page for more information.

Employees who report wrongdoing in good faith will not suffer punishment or retaliation. However, any attempt to misuse the Global Compliance Hotline or the provisions of this Code to wrongfully and intentionally harm a person by making false accusations or engaging in other improper conduct will result in disciplinary action, including possible termination of employment.

INTEGRITY HOTLINE

Reporting Suspected Wrongdoing: The Global Compliance Hotline

Jabil does business honestly and with integrity. We need the help of all our employees to maintain the highest level of integrity. If you learn of any suspected wrongdoing, please report it to the Company, either by speaking to a supervisor or by using the Global Compliance Hotline.

Any Jabil employee may use the Global Compliance Hotline to anonymously report any suspected wrongdoing, including such things as:

- Theft of Jabil assets
- Unlawful or improper accounting practices
- Unlawful or improper performance of a U.S. government contract

An operator, employed by a company other than Jabil, will answer your call, take the information you have to offer and forward a report for appropriate follow-up and investigation.

Any attempt to misuse the Business Conduct & Ethics Program to intentionally harm a person through false accusations or other wrongful conduct is prohibited. However, honest reports made in good faith will be taken seriously and dealt with appropriately.

The following options are available for anonymously reporting any wrongdoings:

Telephone number within the U.S.:
1-877-217-6328

Outside the U.S., the telephone number is posted at your facility.
Operators are available 24 hours per day, in any language.

You can also anonymously report your concerns using a web form:
www.JabilGlobalCompliance.com

REGULATION FD

Fair Disclosure

Jabil is committed to the timely and fair disclosure of information about the Company without advantage to any particular analyst or investor, consistent with the U.S. Securities and Exchange Commission's Fair Disclosure Regulation (also known as "Regulation FD"). Jabil believes it is in the Company's best interest to maintain a current, active and open dialogue with investors regarding the Company's historical performance and future prospects.

To help ensure we meet these objectives we have implemented a detailed policy specifying not only who may make such disclosures on behalf of the Company but also in what particular manner they shall be made. It is generally the Company's policy that only those specifically authorized Company officers trained in the details of this policy shall be permitted to release information about the Company to the public.

Please follow this link to read and comply with [Jabil's Regulation FD Policy](#).