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Anti-Corruption Policy	Revision & Effective Date: Rev. 3, 20-Jul-18	
Issuing Department: Ethics & Compliance	Previous Revision & Effective Date: Rev. 2, 22-June-15	

PURPOSE

To establish Jacobs' policy regarding compliance with the U.S. Foreign Corrupt Practices Act ("FCPA"), United Kingdom Bribery Act 2010 ("UKBA") and other applicable Anti-Corruption Laws.

POLICY AGAINST BRIBERY AND CORRUPTION

Jacobs is committed to conducting business honestly, ethically and with integrity. It is the policy of Jacobs to conduct its business operations and activities in compliance with the FCPA, UKBA and the Anti-Corruption Laws of any other countries in which the Company does business. Anti-Corruption Laws generally prohibit businesses and individuals from authorizing, offering, paying or giving "Anything of Value" (as defined herein) directly or indirectly to any person for the purpose of improperly influencing, or causing another person to improperly influence, any act or decision by a Government Official or government, or by any other person, in order to obtain or retain business or to gain a business advantage; or soliciting or receiving Anything of Value in such circumstances.

To comply with the Anti-Corruption Laws and Jacobs' ethical standards, Jacobs Personnel may not engage in any of the prohibited actions listed below.

Offering or providing benefits to Government Officials can raise particular risks under the Anti-Corruption Laws, and must be approached with heightened caution. Jacobs Personnel who interact with Government Officials must ensure that any benefit conveyed to a Government Official directly, or through a Third Party, complies with all applicable laws and regulations, the internal rules of the recipient's organization, and this Policy.

The prohibited actions listed below describe activities that have the purpose (whether actual or perceived) of trying to influence (or cause another person to influence) any act or decision of a Government Official or any other person in order to obtain or retain business or gain a business advantage.

Prohibited Actions

Jacobs Personnel are prohibited from offering, promising, authorizing or giving Anything of Value, directly or indirectly through a Third Party, to any other person or organization with the intent (whether actual or perceived) to:

- Influence an act or decision of the recipient in his or her official capacity;
- Induce the recipient to do or omit to do any act in violation of the lawful duty of the recipient;

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- Secure any improper, unfair, or illegal advantage for the Company;
- Prevent competitors from obtaining or retaining business;
- Improperly reward the recipient for past conduct; or
- Induce the recipient to use his or her influence with a government or elsewhere to affect or influence any act or decision in order to assist the Company in obtaining or retaining business for itself, or directing business to any other person.

Jacobs Personnel also are prohibited from requesting, agreeing to receive, or accepting a bribe, kickback, or any other financial or other advantage that is, or could be perceived as, improper.

KEY RISK AREAS

Gifts & Hospitality

Anti-Corruption Laws can be violated not only by offering or giving but also by receiving or agreeing to accept Anything of Value. The circumstances — timing, value, place — under which you receive or offer a Gift, entertainment, Hospitality and travel (“G&H”) are important factors to understand whether or not you should accept or offer it. Before deciding to offer or accept G&H or Anything of Value to or from our business partners, clients, or Third Parties, refer to Gifts and Hospitality “G&H” Policy GPS01-103-12 for applicable rules.

Political and Charitable Contributions

Political Contributions (as defined in this Policy) may not be made by Jacobs Personnel or any Third Party working on the Company’s behalf unless they fully comply with Jacobs’ Code of Conduct, this Policy and the Charitable and Political Contribution Policy, as well as all applicable laws.

Charitable Contributions (as defined in this Policy) may also raise corruption risks and must be analyzed to determine the intent of the person requesting the Charitable Contribution and his/her relationship with the recipients. All Charitable Contributions must fully comply with Jacobs’ Code of Conduct, this Policy and the Charitable and Political Contribution Policy, as well as all applicable laws.

All Charitable and Political Contributions must be pre-approved in accordance with the requirements stated in the Charitable and Political Contribution Policy GPS01-103-17 and may not be made to individuals. All payments made for Charitable or Political Contributions must be paid through Accounts Payable and submitted using an invoice or check request. Employees are prohibited from requesting reimbursement of a Charitable Contribution via an expense report or through petty cash.

Facilitating or Expediting Payments

While conducting its day-to-day business, Jacobs may have to make payments to government agencies to secure authorizations, permits, or licenses or pay user fees. Such payments are lawful, so long as they can be verified by reference to invoices or officially published tariffs, fee scales or other publicly available guidance.

In some cases, however, employees of government agencies will seek Facilitating or Expediting Payments (as defined in the Policy). These may be considered small bribes that are usually given to an individual Government Official to obtain performance or to speed up a function to which the payer has legal entitlement and where the Government Official has no discretion.

Because it is often difficult to distinguish between a lawful Facilitating or Expediting Payment and an illegal bribe, this Policy prohibits payment of Facilitating or Expediting Payments other than in circumstances where demands are accompanied by a genuine and immediate threat to life, limb or

liberty. Facilitating or Expediting Payments provided as a result of a threat to life, limb or liberty must be reported to Compliance Counsel as soon as possible to ensure that the payment is accurately recorded in Jacobs' books and records. Jacobs will not take disciplinary action against an employee who makes a Facilitating or Expediting Payment in these circumstances.

ENGAGEMENT OF THIRD PARTIES

In every transaction that involves a Third Party, the Company must attempt to determine through appropriate due diligence that the Third Party is a legitimate and trustworthy enterprise or individual that will comply with all applicable Anti-Corruption Laws and address and resolve any potential concerns.

These due diligence reviews are proportionate to the risk of potential corrupt practice as defined in GPS01-108 Due Diligence of Third Parties must be conducted according to that Policy before entering into any business agreement with a Third Party, and must be performed again and, where necessary, supplemented in the event a relevant concern is subsequently raised about any Third Party.

Moreover, Jacobs could be held responsible for violations of Anti-Corruption Laws committed or caused by any Third Party acting on behalf of Jacobs, such as Suppliers or Representatives, which is why conducting due diligence as prescribed by GPS01-108 Due Diligence of Third Parties Policy is critical.

Red Flags for Corrupt Business Practices

The following are some examples of 'red flags' that should raise concerns about possible corrupt activities that could violate the Anti-Corruption Laws. Any employee who becomes aware of one or more of the following red flags in connection with an actual or potential transaction must immediately notify Compliance Counsel.

- Requests for payments to a numbered account (where the identity of the account holder is not disclosed)
- Requests for payments to be made:
 - in a country other than the country where services are to be performed or where the recipient is legally based,
 - in cash, or
 - in a currency other than that used in the country where the services are to be performed or where the intended recipient is legally based
- Unusually high fees, commissions, or retainers
- History of corruption in the country
- Questionable reputation of, or known concerns about, a Third Party
- Refusal by a Third Party to complete a diligence questionnaire or to cooperate in related due diligence enquiries as required in GPS01-108 Due Diligence of Third Parties
- Refusal by a Third Party to agree in writing that it will not engage in corrupt activities and to accept that a violation of such obligation constitutes grounds for termination of the relationship for default
- Lack of transparency in financial records
- Inflated or unusual invoices
- Relationships between a Third Party and Government Officials or other inappropriate relationships.
- Apparent lack of qualifications or resources on the part of the Third Party

- Recommendations from a Government Official or client or potential client regarding use of the proposed Third Party
- Third Party's association with one or more foreign companies that is unexplained or inadequately explained
- Heavy reliance by a Third Party on political, social, or government contacts as opposed to knowledgeable staff and investment of time to promote the Company's interests
- Third Party's desire to keep the Third Party engagement secret

Mergers and Acquisitions

Mergers and acquisitions ("M&A") have been an important part of Jacobs' growth strategy and anti-corruption considerations are an important part of M&A deals. All companies, entities or other parties that the Company seeks to acquire or merge with shall undergo appropriate anti-corruption due diligence based on the risk presented, pursuant to the rules for both pre- and post-acquisition due diligence set forth in the Merger and Acquisition Guidebook.

ACCURATE BOOKS AND RECORDS

The books and records provisions of the FCPA require companies governed by the US Securities and Exchange Commission, like Jacobs, to properly record all transactions with clarity and accuracy. Accordingly, all transactions must:

- Be executed in accordance with management's authorization (as defined in our policies and procedures);
- Be transparent containing documentation that clearly supports each transaction and includes a detailed description of the business purpose (examples of documentation include vendor receipts, itemized credit card receipts, Supplier invoices and lists of attendees or recipients);
- Be recorded in a manner that permits the preparation of financial statements in accordance with applicable standards (notably Generally Accepted Accounting Principles);
- Maintain accountability of assets; and
- Be recorded in accounts that are reconciled to underlying detail at reasonable intervals.

Red Flags for Books and Records and Accounting Violations under FCPA and Other Anti-Corruption Laws

- Inadequate cash controls
- Vague, non-specific descriptions of payments made in entries
- Documents conceal the true identify of a Third Party or counterparty
- Payment descriptions that do not correspond to the applicable contract documentation
- General purpose or miscellaneous accounts that can be used to hide improper payments
- Over-invoicing or false invoices
- Unrecorded accounts or transactions
- Travel and expense forms with incomplete information
- Submission of false or inaccurate expense account reports

- Misstatement of transactions, e.g., recording a payment to the wrong payee

CORRUPTION RISK MITIGATION PLANS

As part of the decision to pursue or perform work in certain locations, countries, or circumstances, the Company will develop, in coordination with the Ethics and Compliance Department, a corruption mitigation plan/ethics and compliance plan for any project or pursuit (1) which will require work in a country with a Transparency International Corruption Perception Index (CPI) less than 31; (2) which will require work in a country where we have no established office and the CPI is less than 50; (3) where the potential client is on a restricted or denied parties list, or is otherwise subject to sanctions or trade restrictions on account of its ownership or control by a listed party; or (4) which will likely involve a migrant workforce or otherwise have workers vulnerable to increased risk of human rights exploitation. See GSOP-110.

CERTIFICATIONS

Relevant Jacobs Personnel, Representatives, Joint Venture Partners, and Suppliers, must periodically certify in writing that they have received and understand Jacobs policies and procedures related to anti-corruption compliance; that they have acted in compliance with and will continue to comply with such policies and procedures; that they are not aware of any violations of these policies and procedures; and that they will report any violations or concerns in the future. Furthermore, Compliance Counsel shall periodically review select cases for compliance with this Policy.

TRAINING

The anti-corruption training program provides specific instruction that is appropriate to the needs and risks of each employee's assignment. It is delivered through web-based tools, in groups, and in one-on-one sessions. The Ethics and Compliance Department is responsible for ensuring that anti-corruption training is provided globally, and no less frequently than every two years. Managers are responsible for identifying personnel who should receive anti-corruption compliance training and providing their names to the Human Resources Department and the Ethics and Compliance Department.

REQUESTS BY GOVERNMENT OFFICIALS OR OTHER THIRD PARTIES

Any request for Jacobs, Jacobs Personnel or any Third Party acting on behalf of Jacobs to transfer Anything of Value to a Government Official, commercial or private entity or other Third Party other than permitted by this Policy or any other Jacobs policy, must be immediately reported to the Ethics and Compliance Department directly or at compliance@jacobs.com or through the Jacobs Integrity Hotline at integrity.jacobs.com or at telephone number **+1(844) 543-8351** or askaquestion@jacobs.com.

QUESTIONS OR REPORTING SUSPECTED VIOLATIONS:

Jacobs has an open-door policy for all employees and encourages open communication, feedback and discussion. Employees are expected to proactively seek interpretations or advice on the best course of action. If you have questions regarding GPS01-103-07, or related policies or procedures, please contact the Ethics and Compliance Department directly or at compliance@jacobs.com. Suspected violations must be reported and employees have many ways to do so. Jacobs Personnel may contact their supervisors, Human Resources, the Legal Department or the Ethics and Compliance Department directly or at compliance@jacobs.com or through the Jacobs Integrity Hotline at integrity.jacobs.com or at telephone number **+1(844) 543-8351** or askaquestion@jacobs.com.

Reports of misconduct will be investigated and employee cooperation in investigations is required. Failure to report a violation of Policy GPS01-103-07 will be treated as a violation. Retaliation against anyone who reports a potential violation of Policy GPS01-103-07 in good faith is prohibited and will not be tolerated. No one will be reprimanded, or otherwise punished, for raising questions in good faith related to any transaction or potential concern.

DISCIPLINE

Violations of this Policy, as with all Jacobs policies and the Company's Code of Conduct, will be taken seriously. Violators may be subject to disciplinary sanctions up to and including termination. In addition, individuals may be subjected to incarceration or fines if prosecuted by national law enforcement authorities for breaches of Anti-Corruption Laws.

DEFINITIONS

- **Anti-Corruption Laws** means the FCPA, UKBA, the Canadian Corruption of Foreign Public Officials Act, similar anti-corruption laws such as the Organization for Economic Cooperation and Development's Convention on Combating Bribery of Foreign Government Officials in International Business Transactions and the United Nations Convention Against Corruption, and any other applicable law or regulation governing corruption, bribery, and similar misconduct.
- **Anything of Value** should be broadly construed and refers not only to cash or a cash equivalent, but also includes but is not limited to discounts, Gifts, use of materials, facilities or equipment, entertainment, drinks or other Hospitality, meals, transportation, lodging, insurance benefits, investment opportunities, tuition, political or charitable contributions, or promises of future employment to an individual or one of their Relatives. The perception of the recipient and the subjective valuation of the thing conveyed are key factors considered in determining whether Anything of Value has been offered, promised or given.
- **Charitable Contribution** means a monetary or in-kind donation, sponsorship or corporate membership.
- **Facilitating or Expediting Payments** are payments to a Government Official that are small in value and made to expedite or secure the performance of a routine, non-discretionary governmental action that is ordinarily performed by a Government Official and to which the payer would otherwise be legally entitled.
- **FCPA** means the U.S. Foreign Corrupt Practices Act of 1977 and any amendments thereto.
- **Gifts** include but are not limited to:
 - Tickets or admission to sporting events (whether as a spectator or participant) or cultural events (for example, plays, concerts, art exhibits), and industry related events when the provider of the tickets does not accompany the recipient to the event;
 - Tangible items or merchandise; and
 - Food or beverages not consumed during a business meal or event (for example, fruit baskets or wine).
- **Government Official** means any officer or employee of a national government; or any state, province, county or city, or other regional or local government; or any department, agency, or instrumentality thereof; or of a public international organization; or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or on behalf of any such public international organization; or an official of any political party, or a candidate for political office or anyone acting on their behalf; or a member of a royal family, tribal chief, or other person with government immunity or status.

- **Hospitality** means food and beverages consumed during a business meal, travel expenses (airfare, accommodations, taxi or car fare) or entertainment, i.e., tickets or admissions to sporting events (whether as a spectator or participant), industry related events, or cultural events when accompanied by the provider.
- **Jacobs** or **Company** means Jacobs Engineering Group Inc. and all of its affiliates, subsidiaries and majority owned or controlled Joint Ventures or similar arrangements worldwide.
- **Jacobs Personnel** means full and part time officers and employees of Jacobs or any affiliate, as well as contract employees, independent contractors, agency workers or anyone else with whom Jacobs is in an employer-employee or principal-agent type of relationship. Jacobs Personnel include persons employed by a Joint Venture in which Jacobs has a majority interest or managerial control.
- **Political Contribution** may include, but is not limited to:
 - Political and campaign contributions made to support: political action committees (PACs); individual candidates; political parties; and/or legislative and ballot initiatives at the U.S. federal or other national government levels, or state, provincial, municipal, local, and/or any other level of government, or any department, agency, or instrumentality thereof; or of a public international organization;
 - Contributions made by any PAC or other similar fundraising vehicle;
 - Contributions in kind, such as services, products, or supplies, donated volunteer labor to work for political causes or candidates, organization and funding of fundraiser events, and the like.
- **Relative** means spouse, domestic partner (registered or otherwise), civil union partner or life partner (hereinafter, “Significant Other”); the Significant Other’s siblings, parents (whether biological, foster or adoptive), grandparents (whether biological, foster or adoptive), children (whether biological, foster or adopted), step children, legal wards, nieces, nephews, aunts, uncles, and first cousins; the spouses of any of these people; and any other individuals who share the same household.
- **Third Party** means any external party with which Jacobs does business. Types of Third Parties include Suppliers, Representatives, and Joint Venture Partners.
 - “Joint Venture” means any contractual arrangement whereby Jacobs and another non-affiliated entity (the “Joint Venture Partner” or “JV Partner”) commit to work collaboratively on one or more projects or business opportunities and by virtue of which Jacobs and the Joint Venture Partner are each jointly and severally liable to one or more third parties. The term “Joint Venture” includes Joint Venture or consortium agreements as well as teaming agreements or memorandum of agreements that commit to forming a Joint Venture in the future. The term “Joint Venture” also includes a corporation or limited liability company formed in combination with a non-affiliated entity where Jacobs and the non-affiliated entity have contractually agreed to joint and several liability either through parent company guarantees, letters of credit or an operating/shareholder agreement, and includes a corporation, limited liability company or other legal entity in which Jacobs and a non-affiliated company each own stock or shares or have made an investment where Jacobs’ liability is limited to the investment.
 - “Representative” means any individual, entity, agent, or sponsor that is or may be retained wholly or partly for the purpose of assisting in the sale of Jacobs’ products or services to clients or potential clients, and any firm or individual who is to serve as business representative or in-country sponsor. The term “Representative” also includes a lobbyist who engages in public advocacy or promotes his/her private connections or provides access to or influences Government Officials, solely or in addition to performing technical or other project-related services for a project. However, individuals who are retained solely to provide advice to Jacobs and are paid on the basis of fixed hourly or daily rates shall not be considered to be Representatives as long as payment amounts are not determined based upon a desired outcome.

- “Supplier” means any individual, company or firm - including but not limited to vendors, contractors, consultants, and other business partners - that provides goods or services or is retained by Jacobs: (i) to a Jacobs office or facility; (ii) where a Jacobs employee requests or accepts delivery in the course and scope of their employment; (iii) where Jacobs is expected to (or in fact does) pay for the goods or services; (iv) where Jacobs issues a contract or purchase order for the goods or services either for its own account or as agent for the client; or (v) where Jacobs is under contract with its client to manage, administer, monitor, or supervise the contractor, vendor, supplier or entity retained by the client.
- **UKBA** means the United Kingdom Bribery Act 2010 and any amendments thereto.

AUDIT

The Company’s Internal Audit Department periodically audits compliance with this Policy or as requested by the Company’s General Counsel or the Audit Committee of Jacobs’ Board of Directors.

LOCAL DIRECTIVES

An SvP/GM, with prior written approval of Compliance Counsel, may issue directives which are more restrictive than this Policy. All such local directives are to be maintained by the Ethics and Compliance Department. No local directive may waive any aspect of this Policy except with the prior written approval of the General Counsel.

EXCEPTIONS

No exceptions to this Policy may be granted without the prior written approval of the General Counsel.

APPLICABILITY

Policy GPS01-103-07 applies to Jacobs and to all Jacobs Personnel wherever located. Policy GPS01-103-07 also applies to each Joint Venture (whether a partnership, incorporated, unincorporated, or consortium), and to the directors, officers and employees of any Joint Venture in which the Company has (i) a majority ownership interest or (ii) effective control. If an entity other than Jacobs has majority ownership or effective control, Jacobs Personnel are to use their best efforts to have the Joint Venture adopt a policy substantially similar to this Policy.

IMPLEMENTATION

The Vice President, Ethics and Compliance has responsibility for the implementation of Policy GPS01-103-07 and establishes the procedures necessary for implementation of and monitoring compliance with Policy GPS01-103-07, including provision and regular review and updating (where necessary) of related anti-corruption training. The Vice President, Ethics and Compliance may report matters related to this Policy to the Jacobs Board of Directors, directly or through the Company’s General Counsel.

REFERENCES

GPS01-103-08	Audit and Investigation
GPS01-103-17	Charitable and Political Contribution
GPS01-103	Code of Conduct
GPS01-103-09	Compliance with Export Laws
GPS01-108	Due Diligence of Third Parties
GPS01-103-12	Gifts and Hospitality
GPS01-110	Risk Identification & Management

	Supplement to M&A Guidebook
GPS01-109	Supplier Code of Conduct
GPS01-103-15	Whistleblower Protection